

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /  
Climate Change, Environment and Infrastructure Committee  
Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd  
PR 115  
Ymateb gan Y Cyngor Defnyddwyr Dŵr / Evidence from Consumer Council for Water (CCW)



# **CCW response to Senedd Climate Change, Environment and Infrastructure Committee Working Priorities consultation**

**Date: September 2021**

## Who we are

The [Consumer Council for Water \(CCW\)](#) is the independent voice for water consumers in England and Wales. Since 2005, we have helped thousands of consumers resolve complaints against their water company, while providing free advice and support. Our work is informed [by extensive research](#), which we use to champion the interests of consumers and influence water companies, governments and regulators.

We welcome the opportunity to share our views on the work priorities of the Climate Change, Environment and Infrastructure Committee over the next twelve to eighteen months and for the duration of the sixth Senedd's term.

## An opportunity to elevate the importance of water in Welsh policy

During the sixth Senedd, we have an opportunity to work with elected Members and the Welsh Government to elevate the importance of water consumers - and water more generally - in Welsh policy and legislation that can help meaningful action to tackle climate change.

Current key policy developments we should all be considering to achieve this include:

- The implementation of recommendations of the Independent review of water affordability delivered by CCW and commissioned by Ministers in England and Wales
- The review of the Welsh Government's Water Strategy for Wales – an action focussed policy tool on water
- A Joint Vision for Water in Wales signed by regulators & CCW
- A refreshed Welsh Government Strategic Direction Statement to Ofwat (the water industry regulator) to inform decisions on industry investment and price reviews
- Drainage and Wastewater Management plans from the two companies operating in Wales<sup>1</sup>.
- A Water Resources West draft regional plan by 2022 and ongoing cross-border (Wales & England) discussions about water resources strategic planning.

CCW always considers how our work programme fits with the Wellbeing of Future Generations Act (2015) and Wellbeing goals in Wales, and we have included a table that demonstrates this in Annex 1.

## Recommendations of the Independent Affordability review

On 26th May 2021, CCW published [the findings of the independent review](#), which was commissioned by UK and Welsh Government Ministers to make recommendations that will lead to tackling poverty in water. We engaged the public in discussing solutions to water poverty, but also reviewed water industry and cross-sector assistance practices to share learning and coordinate solutions to the growing problem of water poverty.

The **affordability of water bills is a key concern when considering investment in climate change adaptation, water/wastewater services and environmental resilience**. The provision of comprehensive support for those who struggle to pay their water bills can help reduce barriers to investment in the solutions for climate, infrastructure and service resilience.

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<sup>1</sup> Dŵr Cymru Welsh Water and Hafren Dyfrdwy.

CCW recommends that the Committee should explore the following issues on behalf of water consumers:

- Ending the existing ‘postcode lottery’ of financial support through the creation of a single social tariff for all water companies in England and Wales (**top priority**)
- Improved data sharing between UK Government departments and water companies to ensure Welsh customers get support when they need it most.

Water poverty may mean different things to different audiences. In the context of the [Independent Affordability Review](#), we consider households to be in water poverty when they spend more than five per cent of their income (after housing costs) on water bills.<sup>2</sup>

## Committee priorities over the next twelve to eighteen months

### *Implementing a single social tariff for England and Wales*

**Climate change challenges and environmental ambition in Wales could require the consideration of further action**, including investment, in water and wastewater services. CCW sees **addressing affordability of water bills as a key step on the journey to creating a Wales that is fit for future generations**.

CCW recommends that the committee support the establishment of a single social tariff for Wales and England. We also ask the committee to recommend that Welsh Government (legislation) and the sector (company-based implementation) deliver this by 2025.

The Committee’s scrutiny would help support the solution that we strongly believe is best for the people of Wales and which builds on the existing assistance **provided by water companies in Wales to date**<sup>3</sup>. This should happen in parallel with further analysis and work planned to design a tariff beneficial to the people of Wales, as Minister Julie James has instructed us to complete.

### *Improved data sharing to support the vulnerable during times of need*

The effects of the climate crisis will lead to more extreme weather events, which means the exposure of people in vulnerable circumstances to its impact will be greater. It is important that the most vulnerable in society are supported.

Specific actions that CCW recommends for the Committee should consider:

- **Improve the data held about customers** - and sharing it with stakeholders within the boundaries of the Digital Economy Act – are two key ways in which water companies can take a more holistic view of individual customers’ circumstances, and adopt a more proactive approach to providing them with advice and assistance. We would like the Committee to explore how data sharing could be strengthened in Wales.
- **Support permanent data sharing between the Welsh Government and water companies in Wales** at times of crisis, for example, during severe weather events. Permanently sharing the

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<sup>2</sup> This definition of water poverty is used as an assistance prioritising approach because it helps target those in severe poverty. Numbers of customers in 5% water poverty overlap with more customers in broader relative income poverty as well as the numbers of customers that tell CCW they struggle to pay bills.

<sup>3</sup> Over 120,000 are customers through current water company social tariffs in Wales even if they are not necessarily all of those in 5% water poverty or what we call severe water poverty.

data of vulnerable customers is currently explored by the flagship JIGSO project in Wales. We ask the committee to explore recommendations for Welsh Government to improve this process.

### *End sewer-flooding misery: Wastewater and flooding in Wales*

The flooding experienced across Wales in February 2020 had a devastating and long-lasting impact on Welsh communities, as noted in the [Climate Change Committee's Inquiry report in December 2020](#). Whilst these events were classed as exceptional, it is obvious that extreme rainfall and its impact are becoming more frequent because of climate change.

In CCW's view, a key priority for this Committee is to examine the resilience of drainage and wastewater services and its impact on customer services, communities, public health, and environmental resilience.

Specific actions for the Committee include:

- Support the [statutory status and delivery of company specific Drainage and Wastewater Management Plans \(DWMPs\)](#)
- Support [CCW's End Sewer flooding campaign](#). In 2021/22 CCW is undertaking cross-industry work to seek improvements to wastewater companies' sewer flooding response and policies. This includes the prioritisation of those who live in fear of sewer flooding because of repeat incidents as well as removing exceptional weather event exemptions for company compensation for those at higher risk
- Ask Welsh Government and Natural Resources Wales that data available from **monitored Storm Overflows** is analysed to prioritise asset investment and identify other appropriate solutions, which could reduce likely environmental, community and public health impacts caused by excess rainfall and dated infrastructure. There are over 3,000 overflows in Dŵr Cymru Welsh Water's area alone and most of those have been monitored to help inform investment discussions.

CCW's flagship [industry wide public views on the environmental research](#) highlighted the public's view that we need to look after the water environment for future generations. Participants reported widespread agreement that collective action is essential to address problems, and that the public, water industry, and government all have roles to play. Participants in Wales were slightly more likely than those from England to be aware of water companies' roles in respect of the water environment.

### *The role of water in retrofit schemes targeting social housing in Wales*

**In 2020/21, there was an increase of water consumption at home, by 10% in households in Dŵr Cymru's area compared to the previous year despite increasing and targeted water efficiency advice.** Wales also has an ambitious **110 litre daily water consumption target for new developments** in its [building regulations](#). However, retrofitting inefficient buildings with water efficient appliances and systems, and prioritising this for social housing in Wales in line with existing initiatives, could further help to achieve this whilst also supporting those who need help with bills.

We would like the committee to support a joined-up approach to the challenges of climate change, addressing water efficiency and water poverty. This would result in a triple benefit of assisting those who struggle with their bills, building resilience through making existing water resources go further and reducing carbon emissions (from water production and from the heating of water in the home).

More specifically, Minister Julie James's [£70m optimised retrofit scheme budget targeting social housing in Wales in her letter to this Committee](#) should extend to water. It presents an opportunity to explore leakage repair and retrofitting for water as well as energy efficiency with participating social housing partners. This approach could ensure maximum savings in terms of carbon reductions, as well as placing emphasis on linking water efficiency and affordability support as outlined in the Independent Affordability Review. Lessons and approaches from the [Arbed](#) scheme as well as from [Dŵr Cymru Welsh Water's ongoing Project Cartref](#), which targets specific locations to fix water leaks, could be utilised in integrating water related measures in the forthcoming retrofit scheme.

In addition to this, the committee could support:

- Action to raise awareness that using less water can lead to smaller utility bills
- Financial support to be made available for low-income households for water efficient products that are unaffordable (for example white goods)
- Asking companies to encourage low-income households who would benefit from switching to a meter to make the change by offering them a lowest bill guarantee

### Climate-resilient water: Water resource planning and transfers

**Water resources and supply resilience is outlined in economic growth policies in Wales (see [Future Wales- The National Plan 2040](#)).**

We should all be having more comprehensive discussions on the potential of future water transfers and trading across regions of Wales and through Wales to England, as well as water resources planning for the long term.

More specifically, the Committee should be asking for:

- Welsh Government's position regarding the **Regulators' Alliance for Progressing Infrastructure Development (RAPID) commitment to ensuring resilience water supplies for the future across Wales and England.**
- The delayed [National Infrastructure Commission for Wales'](#) work on water to consider cross-border resilience of water supplies and any **Natural Resource Wales water resources mapping findings**, which will help inform future water company Water Resource Management Plans in Wales as well as Welsh Government guidance on water resource planning.

Finally, the Committee should be considering the **ongoing work of the Water Resources West group** (covering England and Wales) and current work on a **draft regional plan from Water Resources West by 2022.**

### Further discussions

CCW would welcome further discussions with the Committee on the contents of our response. Please don't hesitate to contact Lia Moutselou, Senior Policy Manager in Wales ([lia.moutselou@ccwater.org.uk](mailto:lia.moutselou@ccwater.org.uk)) or Ellen Jones, Campaigns and Engagement Manager ([ellen.jones@ccwater.org.uk](mailto:ellen.jones@ccwater.org.uk)) to arrange a meeting or ask any further questions.

## Annex 1 – Cross reference of CCW’s works programme & campaign with Well-being goals Wales

CCW Strategy	Well-being Goals							Water Strategy For Wales
	A prosperous Wales	A resilient Wales	A healthier Wales	A more equal Wales	A Wales of cohesive communities	A Wales of vibrant culture and thriving Welsh language	A globally responsible Wales	Current WG strategy Themes
Affordable water for everyone (3)								<b>1. Water for nature, people and business</b>
Climate-resilient water and sewerage services for present and future consumers (1,2, 4, 5)								<b>2. Improving the way we plan and manage our water services</b> <i>Relevant CCW Campaign: “Be in the know” about available help</i>
Services shaped by the views of consumers (1-5)								<b>3. Delivering excellent services to customers</b> <i>Relevant CCW Campaigns: End water poverty CCW: a voice for your complaint “Be in the know” about available help</i>
Services that meet everyone’s needs (1-5)								<b>4. Protecting and improving drinking water quality</b>
Effective and easy-to-follow complaint processes (3)								<b>5. 21st century s drainage and sewerage systems</b> <i>CCW Campaign – Ending Sewer flooding misery</i>





A young boy with curly hair is shown in profile, drinking water from a clear glass. He is wearing a checkered shirt. The background is a blurred indoor setting. A large, stylized, semi-transparent 'ccw' logo is overlaid on the right side of the image.

**ccw**

The voice for water consumers  
Llais defnyddwyr dŵr

**A Summary:  
Priorities for  
Climate  
Change,  
Environment  
and  
Infrastructure  
Committee**

[ccwater.org.uk](http://ccwater.org.uk)



# Who we are

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- We resolve consumer complaints against their water company, while providing free advice and support.
- Our work is informed by extensive research, which we use to champion the interests of consumers and influence water companies, governments and regulators.

# What we can achieve together ...

During the term of this Senedd we could help :

- *Elevate the importance of water consumers - and water more generally - in Welsh policy and legislation.*
- *Take a joint up approach to the challenge of water poverty and climate change.*

# Help implement a single social tariff for England and Wales



*Climate change challenges and environmental ambition in Wales could require the consideration of further action, including investment, in water and wastewater services. CCW sees addressing affordability of water bills as a key step on the journey to creating a Wales that is fit for future generations*

CCW recommends that the Committee support the establishment of a single social tariff for Wales and England, through Welsh Government (legislation) and the sector (company-based implementation) deliver this by 2025.

# Improve data sharing to support the vulnerable during times of need

*The effects of the climate crisis will lead to more extreme weather events, which means the exposure of people in vulnerable circumstances to its impact will be greater. It is important that the most vulnerable in in society are supported.*

The Committee should:

- 1. Support improving the data held about customers** - and sharing it with stakeholders within the boundaries of the Digital Economy Act
- 2. Support permanent data sharing between the Welsh Government and water companies in Wales** at times of crisis, for example, during severe weather events.

# End sewer flooding misery: wastewater and flooding in Wales



*The flooding experienced across Wales in February 2020 had a devastating and long-lasting impact on Welsh communities, as noted in the Climate Change Committee's Inquiry report in December 2020. Whilst these events were classed as exceptional, it is obvious that extreme rainfall and its impact are becoming more frequent because of climate change.*

The committee should:

1. Support CCW's End Sewer flooding campaign.
2. Continue to support the statutory status and delivery of company specific Drainage and Wastewater Management Plans (DWMPs)
3. Ask Welsh Government and Natural Resources Wales that data available from **monitored Storm Overflows** is analysed to help prioritise asset investment and other solutions to reduce likely service, environment and community impacts of excess rainfall.



# Water efficiency in retrofit schemes targeting social housing in Wales



*In 2020/21 there was an increase of water consumption at home, by 10% in households in Dŵr Cymru's area compared to the previous year.*

*Action on water efficiency has the triple benefit of assisting those who struggle with their bills, building resilience through making existing water resources go further and reducing carbon emissions (from water production and directly in the home from the heating of water).*

Minister Julie James's £70m optimised retrofit scheme budget targeting social housing in Wales in her letter to this Committee should extend to water. It presents an opportunity to explore leakage repair and retrofitting for water as well as energy efficiency with participating social housing partners.

# Climate-resilience water: Water resource planning and transfers

*We should all be having more comprehensive discussions on the potential of future water transfers and trading across regions of Wales and through Wales to England, as well as water resources planning for the long term.*

The committee should:

- Ask for Welsh Government's response to the **Regulators' Alliance for Progressing Infrastructure Development (RAPID)** commitment to ensuring resilience water supplies for the future across Wales and England.
- Ask the **National Infrastructure Commission for Wales to consider a) cross-border resilience of water supplies and b) the findings of emerging Natural Resource Wales mapping of water resources projects.**
- Consider **the ongoing work of the Water Resources West group (covering England and Wales) and current work on a draft regional plan from Water Resources West by 2022.**