

## **Consulting on the Abstraction Incentive Mechanism**

We welcome the opportunity to respond to Ofwat's consultation on the Abstraction Incentive Mechanism (AIM). We support Ofwat's objectives to seek out new ways to alleviate abstraction on impacting the environment and believe that the AIM is a valuable tool in this regard. However, we believe that a reputational incentive will have very limited success especially with respect to water companies where there is little customer understanding of the process and no ability for them to change providers. The mechanism will only be successful if it is included as a financial incentive in PR19 – a proposal we support.

We broadly support the taskforce's proposals. Filter 1 covers any potentially unacceptable impact on the environment and not just Water Framework Directive rivers and lakes. As such we do not believe the proposed suggestions for AIM sites adequately incorporates this filter and should consider potential biodiversity impacts and sites not covered by Water Framework Directive such as wetland and riparian habitats or areas of lifecycle importance to protected species. Environmental flows affect entire ecosystems, not just in-flow water habitats. We suggest that the AIM is an ideal opportunity to protect the wider environment and habitats which are vulnerable to abstraction.

We welcome the local aspect to deciding AIM locations and triggers and engaging the customer challenge groups on the abstraction sites water companies are proposing to include and reject from the AIM and their reasons for doing so. However, not all customer challenge groups have environmental NGO involvement. We recommend that as well as the Environment Agency, the Water Companies need to approach their local Catchment Based Approach (CaBA) partnership to discuss the options available.

It is important that Filter 3 provides added value to the process. If water companies are to apply other filters it needs to be transparent what the filters are, the criteria for these filters and their reasons for adding the filter. There needs to be an opportunity for feedback as to the appropriateness of an additional filter.

We understand the reasoning behind the refining of the abstraction sites as listed but we do not believe that the process adequately adopts the precautionary principle. Until a site is proven not be affected by over-abstraction, the AIM should be introduced with regular monitoring to detect changes/negative impacts. However currently it is indicated that the AIM will not be introduced to certain sites because of pending environmental assessments. This position ignores that these sites have already been listed with abstraction as impacting its Water Framework Directive surface water body classification, calculated to be in environmental flow Bands 1, 2 and 3.

Although we acknowledge there may be valid reasons for not undertaking AIM at a proposed site we are disappointed at the list of abstraction sites proposed by many water companies. Only 13 per cent of sites on the October 2013 list have been proposed for AIM (accepting that some have been included under business plans) some water companies fall substantially short in ambition (for example Severn Trent Water only covered 11 per cent of their sites in the business plan and are not considering any under AIM; 31 per cent of Anglian Water proposed sites are covered) and yet Affinity Water have the greatest number of proposed sites in the October 2013 list and are proposing the majority of these for the AIM.

## **Blueprint for Water coalition**

The Blueprint for Water is a unique coalition of environmental, water efficiency and fisheries and angling organisations that is calling on the Government and its agencies to set out the necessary steps to achieve “sustainable water” by 2021. The Blueprint for Water is a campaign of Wildlife and Countryside Link. More information is available at [www.blueprintforwater.org.uk](http://www.blueprintforwater.org.uk)

If you would like to discuss any of the points mentioned above further please do not hesitate to contact the Blueprint for Water coalition at [raul@wcl.org.uk](mailto:raul@wcl.org.uk).

This consultation is supported by the following eight organisations:

- Amphibian and Reptile Conservation
- Angling Trust
- Buglife
- Friend of the Earth - England
- Salmon & Trout Conservation UK
- The Rivers Trust
- Wildfowl & Wetlands Trust
- WWF UK

## **Wildlife and Countryside Link January 2016**



Wildlife and Countryside Link  
89 Albert Embankment, London, SE1 7TP  
W: [www.wcl.org.uk](http://www.wcl.org.uk)

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