



thames blue green economy

<http://www.bluegreenuk.com/freewater/tbge.html>

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Attention Rt Hon George Eustice MP, Secretary of State for the Department of the Environment & Rural Affairs, Sir James Bevan, CEO of the Environment Agency and the Clerk of the Committee of Public Accounts.

BY EMAIL ONLY

Dear George Eustice MP

Re: Intention to legally challenge the NPS for Water Resources if adopted without being comprehensively revised to address the Government's Declaration of a Climate and Environmental Emergency. In order for the emergencies to be averted, water policy and therefore the draft NPS for Water Resources must be rewritten to make Integrated Water Resource Management¹ UK water policy.

On May 1st 2019, the UK Parliament declared a Climate and Environmental Emergency. The Government's rational response is to ensure that all policies, where appropriate, are adopted to avoid the emergencies declared. In the sphere of water, access to which is one of the basic universal human rights², Integrated Water Resource Management (IWRM) is global best practice and must be made UK policy.

Unfortunately, this has not been done. The draft NPS for Water Resources does not include IWRM. It surprisingly does not even mention it. The draft NPS is based on out-dated and short-sighted notions of accommodating ever-increasing water demand and allowing the continuation of 'over 3 billion litres, a fifth of the volume used, to be lost to leakage every day' and 'no progress has been made in reducing leakage over the last 20 years'³. These unacceptable facts were set out in the Public Accounts Committee Report 'Water supply and demand management', HC 378, on July 10th 2020.

The draft NPS is clearly not fit for purpose. It was first consulted on in 2017 and still has not been laid before Parliament. This is a dereliction of government's duty toward this human right. Now is the time to create a UK IWRM policy for water. A good example, of the success of IWRM is by the City of Philadelphia. See

<https://www.phila.gov/water/sustainability/greencitycleanwaters/Pages/default.aspx>

In December 2017, as part of TBGE's response to the DEFRA consultation for the NPS for Water Resources, we submitted a Letter Before Action with 3 supporting appendices warning DEFRA that

¹ IWRM is a process which promotes the co-ordinated development and management of water, land and related resources, in order to maximize the resultant economic and social welfare in an equitable manner without compromising the sustainability of vital ecosystems.

<https://www.un.org/waterforlifedecade/iwrm.shtml>

² <https://www.unwater.org/water-facts/human-rights/> and

<https://www.gov.uk/government/publications/human-rights-and-democracy-department>

³ <https://committees.parliament.uk/publications/1825/documents/17744/default/>

legal proceedings would follow if the proposed NPS for Water Resources was not completely rewritten to include IWRM. The Letter with the appendices and John Duder's work referred to in the letter, can be found at Appendix A.

During the consultation, TBGE members met up with the DEFRA team to explain the wider and multi- benefits of IWRM which include many green jobs and financial savings particularly important now because of Covid 19. We also wrote to the DEFRA minister about why IWRM was the way forward. On the final consultation in January 2019, we emailed a copy of our letter to the Rt Hon Michael Gove at Appendix B. However, all apparently to no avail. The NPS for Water Resources was not changed and strangely, even our request for the definition of infrastructure to include IWRM, was ignored.

Parliament's declaration of a climate and environmental emergency does mean that policy must change. We now have a legitimate expectation that water policy will also be changed to reflect best global practice and to help to avert dangerous climate change and catastrophic biodiversity collapse.

Please be advised that our intention to pursue legal proceedings against the UK Government re the content of the NPS for Water Resources remains steadfast. And our resolve even more so, in the light of the climate, environmental emergencies declared by Parliament and the global pandemic underway.

Yours Sincerely

Emily Shirley
TBGE Director