

Consultation on measures to reduce personal water use

Summary of Responses

July 2021



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Introduction

This document summarises the responses received to the government's 'consultation on measures to reduce personal water use'.

Our 25 Year Plan for the Environment, 'A Green Future', sets out a target to ensure clean and plentiful water. By improving three quarters of our waters to be as close to their natural state as soon as is practicable.

The Plan also sets out our commitment to:

- reduce water demand
- incentivise greater water efficiency
- lower personal water use
- work with industry to set an ambitious personal consumption target
- agree cost-effective measures to meet it

We explained in our consultation the challenges our water supply faces from climate change, rising population and growing personal water demand.¹

The National Infrastructure Commission (NIC) reported that to maintain the current level of resilience, at least 3,300 million litres per day of additional capacity in the water supply system is required by 2050.

The NIC suggested that this additional capacity should come from one third supplyside measures and two thirds demand management measures.²

At present a person in England uses 140 litres of water a day.

We want all water companies to have a much greater level of ambition to reduce personal water consumption and they have committed to help households reduce their consumption to 120 litres per day by 2045.

¹ <u>https://www.gov.uk/government/publications/25-year-environment-plan</u>

² <u>https://www.nic.org.uk/publications/preparing-for-a-drier-future-englands-water-infrastructure-needs/</u>

The water industry has also been working to develop an evidence-base on the kind of measures which will support an ambitious consumption target.³

Defra and the Environment Agency sat on the steering group for this project.

We also recognise the vital need to provide the appropriate governance and responsibilities to take forward an appropriate mix of measures.

This consultation therefore asked for views and evidence on policy measures to reduce personal water consumption.

The views and evidence submitted in this consultation will help us develop vital measures to reduce water demand in the UK.

And will ensure that we safeguard our long-term water resilience as part of the government's twin-track approach of reducing demand, including leakage, and increasing supply in parallel.

Failure to deliver on demand reduction will mean more investment will be required in supply solutions, which are typically more expensive and have longer lead-times.

Consultation policy proposals

We consulted on eight policy measures to reduce personal water consumption, followed by a call for evidence, the analysis of which will be published in the spring.

These measures are:

- building regulations for water consumption
- water efficiency labelling
- metering
- smart metering
- incentives
- rainwater harvesting and water reuse
- supply pipe leakage
- communications and behavioural change

³ <u>https://www.ofwat.gov.uk/wp-content/uploads/2018/05/The-long-term-potential-for-deep-reductions-in-household-water-demand-report-by-Artesia-Consulting.pdf</u>

Handling of responses

This consultation ran for 12 weeks from 19 July to 11 October 2019 on Citizen Space.

Defra is grateful to everyone who took the time and effort to respond. The responses have been reviewed by Defra and Environment Agency staff dealing with the consultation proposals.

They may also be seen by other Defra staff and other regulatory bodies, such as Ofwat, to help plan future consultations.

This summary includes responses submitted online through Citizen Space, by post and by email.

This summary is a high-level overview of the main messages from the consultation responses. It tries to reflect the views offered but it is not always possible to describe all the responses in detail.

Please note that this consultation does not represent the views of the whole population. Instead it is a summary of the responses given by those who chose to share their views (for more detail, please see Annex A).

A broad analysis has been made of the key issues raised, including (where feasible) a numerical estimate of those for and against each proposal.

In some instances, responses referred to local issues. We do not respond to local issues in this document.

About the analysis

It is important to keep in mind that public consultations are not necessarily representative of the wider population.

Since anyone can submit their views, individuals and organisations who are more able and willing to respond are more likely to participate.

Because of this likelihood for self-selection, the approach of this analysis has not only been to count how many respondents held a particular view.

The approach taken is largely qualitative - with the aim being to understand the range of key issues raised by respondents, and the reasons for holding their particular views.

This includes potential areas of agreement and disagreement between different groups of respondents.

The objective of a meaningful consultation process is to be as inclusive as possible. This allows as many people to share views in whatever form is easiest and best from their perspective.

In presenting the results, we have aimed to provide a broad picture of all views and comments.

Therefore, a range of qualitative terms are used, including 'many' 'some', 'most', and 'a few'.

Interpretation of the balance of opinion must be taken in the context of the question asked. As not every respondent answered all the questions and not every respondent who provided an answer to a closed question provided additional detail.

In this respect, qualitative terms are only indicative of relative opinions to questions on the basis of who responded.

Therefore, they cannot be assumed to relate numerically back to the total number of people and organisations.

Overview of responses

We received 324 responses to this consultation. There were 285 online responses via Citizens Space and 39 responses by email.

Not all responses followed the format of the consultation.

The following statistics and graphs only consider responses which answered the consultation questions given.

Defra has allocated all responses into categories in Figure 1 to demonstrate the diversity of responses given.

Annex A contains a list of the organisations who responded. This list excludes those who chose to remain confidential.

The majority of respondents to the consultation were individuals. Ninety-six organisations responded.

Of the organisations who responded, the largest groups were businesses and the water industry and representative bodies.

Predominantly made up of environmental and engineering consultancies or businesses related to water products such as rainwater harvesting systems.

The 'Other' category consists of a diverse range of interests, including:

- representative organisations of other sectors
- land or property owners such as the National Trust

Respondents answered consultation questions with varying degrees of depth and levels of interest. For example, there was strong representation of rainwater harvesting and greywater reuse throughout the consultation and therefore answers across the consultation frequently pertained to this specific area of water efficiency.

An initial summary of the main points made for each of the policy sections follows, and we provide a detailed breakdown of those responses and a summary of the comments provided to each individual question in the sections of this document that follow.

Chart 1: proportion of online respondents by category



Figure 1: Breakdown by count of the sector or interest of the 324 respondents to the consultation, allocated by Defra.

Some answers took a campaign-style response or targeted specific issues.

A number of respondents highlighted that the government should not be focusing on reducing personal water use, but on reducing the water consumption or reducing the activities of other sectors such as fracking.

A small proportion of respondents said that water should not be privatised and access to it is a human right.

Summary of consultation responses by theme and question

Building regulations for water consumption

Q1: Do you consider that the current approach in Building Regulations (a mandatory minimum standard for new homes but with local authorities in water stressed areas having discretion to ask for a higher standard through a Building Regulations Optional Requirement) is effective?

There were 297 respondents to Question 1. A small number of respondents said 'yes', they consider that the current approach in Part G of the Building Regulations (a mandatory minimum standard for new homes.

With the option for local authorities in water stressed areas to ask for a higher standard through a Building Regulations Optional Requirement) is effective.

The majority of respondents said 'no' they do not consider it effective. A small number also responded that they had 'no view'.

Chart 2: proportion of online respondents that responded to question 1



Figure 2: percentage breakdown of the 297 responses to Question 1.

Two hundred and fifteen of the respondents provided an open-text response.

Most individuals and organisations who chose to respond said that standards to reduce water consumption in new homes should be more stringent.

Many respondents mentioned the need for a lower personal consumption target.

It was frequently mentioned that a tougher mandatory minimum standard in Building Regulations was necessary to ensure action. As opposed to an optional requirement at the discretion of local authorities.

Most respondents saw the need for a consistent national approach. However, there were mixed views over whether a mandatory minimum standard should be set at a national level or be more flexible according to regional water scarcity levels.

Despite support for increasing stringency of standards, there were repeated concerns that a change in Building Regulations would be ineffective.

As personal water consumption is dependent on the usage habits of home-owners. As well as whether they retrofit inefficient appliances after moving into a new development.

Some respondents also suggested that it is difficult to enforce and monitor the effectiveness of Building Regulations.

Businesses with experience working with Building Regulations highlighted the challenge in establishing compliance with standards due to the lack of information on the water efficiency and flow rates of products provided by manufacturers.

The predominant view from those organisations who responded was that the current Building Regulations are not effective in reducing household water consumption. Reasons given included:

- most respondents said that a tighter, mandatory standard should be applied nationwide and not just in water stressed areas. However, an alternative view was expressed by some respondents who felt that tighter standards should be set regionally to reflect water scarcity
- some respondents said that setting a mandatory, national standard would improve transparency to developers and homeowners. It would also reduce the burden on local authorities located in water stressed areas

Other views provided included repeated concerns that relying on regulations around fitting alone will not be effective without a broader change in public attitudes.

Representatives of the bathroom industry favoured continuing with the existing Building Regulations due to its fittings and whole building approach and allowance of consumer choice of water-using products.

Many respondents suggested ways to make Building Regulations more effective.

Organisations who argued for a change in the current regulations, and particularly the water industry, recommended a move to a 'fixtures-based' approach to setting a consumption target.

They also argued this could then be linked to mandatory water labelling for water using devices.

A fixtures-based approach would mean all new houses would be built with fittings and appliances of a minimum water efficiency rating, linked to a standard or label specified within the Building Regulations.

Some individuals also referred to Building Regulations linked to product water efficiency, as outlined in the preliminary text of the consultation.

A small proportion of individual respondents suggested that Building Regulations for new developments should incentivise or support the use of rainwater harvesting and reuse technologies as a way of building in lower water consumption in new housing.

Q2: Do you consider that the current minimum standard of 125 litres per person per day and optional requirement of 110 litres per person per day should be changed, and if so, what might be an appropriate new standard?

In total, 294 people and organisations responded to Question 2, of which 236 respondents gave an additional open text response.

The majority of respondents to this question said 'yes', they thought that the current minimum standard of 125 litres per person per day and optional requirement of 110 litres per person per day should be changed.

A small number said 'no', it should not be changed, or said they had 'no view'.

Chart 3: proportion of online respondents that responded to Question 2



Figure 3: percentage breakdown of the 294 responses to Question 2.

The majority of those giving an open text response said that the minimum standards should be more ambitious.

Many suggested that the minimum standard should be set at 110 litres per person per day or at 100 litres per person per day. In line with the evidence provided in the preliminary text of this question.

Respondents who did not suggest an alternative appropriate standard frequently said they needed more information or would prefer to take an expert opinion.

Many organisations who responded felt that the current minimum standard of 125 litres per person per day is not challenging enough and that a tighter minimum standard should be set for new properties.

The predominant view was that a new minimum standard of between 100 and 110 litres per person per day should be achievable.

The Consumer Council for Water (CCWater), for example, said that Welsh Government in 2018 amended Welsh Building Regulations to 110 litres per person per day and that it would be sensible for English regulations to be consistent with that.

Most respondents from organisations particularly those from the water industry, said that a new minimum standard should be set using a fixtures-based approach. And that this should be linked to mandatory water labelling.

It was suggested that this would be simpler for developers to comply with, and more easily understood by customers.

Many respondents, including individuals, water companies and organisations indicated that standards should be reviewed over time, with a view to becoming more ambitious.

Waterwise, a not-for-profit organisation specialising in water efficiency, said that developers could build to tight targets of 100 litres per person per day based on a mandatory water label and fittings-based approach. Done with a staged introduction of tighter targets leading to 50 to 70 litres per person per day.

Some respondents also suggested that there should be consistent national standards across England, and/or across England and Wales.

Some respondents did not feel that standards should be more ambitious and indicated that they felt:

- current standards were already appropriate
- challenging enough
- that standards should consider the need of vulnerable users

A small number indicated that they felt that household water consumption should not be restricted at any level.

Q3: Are there any other issues relevant to using Building Regulations to set water efficiency standards that the government should consider?

Similarly, to Question 1, many respondents expressed the view that Building Regulations should require rainwater greywater harvesting in new developments.

Particularly targeting water reuse in toilet flushing and improved capture of water drainage.

Those who expressed this view sometimes said that rainwater and greywater reuse schemes should be at community-scale.

Some respondents did not feel that setting water consumption targets in Building Regulations for new domestic properties went far enough.

For example, those respondents noted that the minimum water using standards should also be extended to new non-household and commercial developments or that water using standards should be extended to existing domestic developments.

A small number of respondents suggested improving existing regulations, such as requiring water efficient products to be specified, simplifying the grading system to inform consumers and homebuyers.

Some mentioned the need to enforce Building Regulations better and/or tackle the 'performance gap' between what is specified in Building Regulations and the actual water consumption of a household.

This is especially relevant where homeowners may replace fittings after purchase with more water-consumptive fittings.

Several respondents suggested that changing building standards in new properties is not enough and that the government should fund a national retrofit programme focussed on water stressed areas.

Suggestions from other respondents included that standards for rented properties are important, and that consideration should be given to a bathroom scrappage scheme.

Q4: To what extent do you agree or disagree that government should work with water companies and local authorities to run partnership retrofit and behaviour change programmes in existing homes?

There were 295 respondents to Question 4.

Of these, the majority of respondents strongly agreed that government should work with water companies and local authorities to run partnership retrofit and behaviour change programmes in existing homes.

A small proportion of respondents slightly agreed, neither agreed nor disagreed or strongly disagreed with the question.

A minority of respondents slightly disagreed with the question or answered, 'do not know'.

Many of those who agreed did so on the basis that multi-sectoral collaboration and local partnerships would have a beneficial impact.

Some respondents said that government support would ensure that water companies and local authorities took action, but that funding was essential for local authorities.

Some respondents also mentioned the value of multi-sectoral collaboration with trusted organisations.

As well as the potential to expand collaboration to integrate businesses such as plumbers.

Of those, many environmental organisations said that there was an opportunity to harness and use third sector networks to enhance water efficiency.





Figure 4: percentage breakdown of the 295 responses to Question 4.

Many individuals agreed that the government should provide support to water companies and local authorities.

Many respondents said that this was because the average person in England has low awareness of water scarcity and water efficiency issues.

They also wanted government support to be required to retrofit existing buildings.

And that this was important given that existing buildings form the majority of current and future housing stock in England.

Several water companies said that government support would be beneficial to encourage consumer uptake of existing schemes.

Regarding both retrofitting and behavioural change, most respondents suggested that these measures would only be successful if they were:

- cost-effective
- incentivised
- paid for by government

There were repeated concerns that programmes should not shift the burden of cost onto the consumer.

Also that consumers would be unlikely to act unless there was a financial incentive.

Many organisations said that there was an opportunity to focus these programmes on social housing and the most vulnerable. Particularly, energy efficiency Non-Governmental Organisations (NGOs) and the water sector. National Energy Action cited their Health and Innovation Programme which provided measures and advice to houses in fuel poverty.

Which they perceived to deliver significant benefits to residents' wellbeing, comfort and energy affordability while delivering behavioural changes.

Alternatively, some respondents suggested that government should create scrappage or trade-in schemes to encourage households to retrofit existing equipment.

Several organisations and some respondents highlighted the potential for join-up with energy efficiency measures in retrofitting and with smart meter roll out.

One organisation cited evidence that smart metering retrofits could reduce domestic water use levels substantially.

Some of the respondents that did not favour government support, said that government should focus on other measures first.

Particularly investing and supporting companies to reduce network leakage, increasing metering and focusing on non-household users.

Some suggested that government support would constitute too much intervention and that water efficiency measures should be dictated by market forces.

But some respondents argued that water efficiency was not an individual's responsibility.

Water efficiency labelling

Q5: To what extent do you agree or disagree that information on water efficiency should be displayed on water using products?

There were 301 responses to Question 5. Of these, 231 chose to explain their choice in an open text response.

Of respondents, the majority strongly agreed that information on water efficiency should be displayed on water using products.

A small proportion of respondents slightly agreed and a minority neither agreed nor disagreed or strongly disagreed with the question.

No respondents slightly disagreed to this question. A minority of respondents also did not answer or answered, 'do not know'.



Chart 7: proportion of online respondents that responded to Question 5

Figure 5: percentage breakdown of the 301 responses to Question 5.

Most respondents viewed labelling as a useful method to inform consumers on water consumption, and one that would encourage purchase of water-efficient appliances.

Respondents frequently said that labelling may also incentivise manufacturers to make more water-efficient products, resulting in better choice for the consumer.

Many references were made to the positive impact of the energy efficiency label, and to labels being useful if they are clear and consistent.

Yet there was little reference to the water consumption metric on the existing energy efficiency label.

Evidence of successful international labelling schemes was also frequently provided, such as the Australian Water Efficiency Labelling and Standards (WELS) scheme and schemes in the United States.

Some respondents who favoured water efficiency labelling , particularly those from the water industry expressed a preference for mandatory water labelling (although most respondents did not have a view on a mandatory versus a voluntary label).

Water industry respondents drew upon the 2018 Waterwise and Energy Saving Trust water efficiency labelling report mentioned in the preliminary text.⁴

This report concluded that mandatory labelling linked to tightening Building Regulations and water supply fitting regulations is "the single most cost-effective government intervention to save water", as opposed to voluntary labelling.

Other analysis cited included the review of WELS by the Institute for Sustainable Futures, Australia, in 2018 and the autumn 2019 Waterwise briefing note on mandatory labelling.⁵

Some respondents who favoured the introduction of mandatory water labelling did caution that while such a scheme would allow consumers to make informed choices about products.

It would not be successful without other measures such as broader public engagement, education on water conservation and investment in leakage.

An alternative view was expressed by the European Bathroom Forum and Unified Water Label who favoured a continuation of the current manufacturer-led voluntary labelling scheme.

They said that a government-led mandatory scheme would be unnecessary and would impose additional burdens on manufacturers.

They also expressed concern that Waterwise's research into the costs and benefits of water labelling options had failed to understand fully the existing voluntary Unified Water Label scheme.⁶

⁴ <u>https://www.waterwise.org.uk/resource/independent-review-of-the-costs-and-benefits-of-water-labelling-options-in-the-uk-summary-report/</u>

⁵ <u>https://www.waterrating.gov.au/about/review-evaluation/environmental-effects;</u> <u>https://waterwise.org.uk/knowledge-base/why-we-need-a-mandatory-water-label-waterwise-briefing/</u>

⁶ <u>https://www.waterwise.org.uk/resource/independent-review-of-the-costs-and-benefits-of-water-labelling-options-in-the-uk-summary-report/</u>

The Bathroom Manufacturers Association also expressed the view that the benefits of a voluntary water label outweigh that of a mandatory label.

They suggested that a voluntary water label would mean that less time would be needed to deliver Eco-design policy directives and this would mean that it would be less expensive.

Q6: To what extent do you agree or disagree that providing information about products' water efficiency changes peoples' purchasing behaviour and reduces their use of water?

In total, there were 295 responses to Question 6.

A small number of respondents strongly agreed that products' water efficiency changes purchasing behaviour of an individual and consequently reduces their use of water.

Similarly, a small number of respondents slightly agreed.

Whereas a minority neither agreed nor disagreed, slightly disagreed and strongly disagreed with the question. A minority of respondents did not know or did not answer.





Figure 6: percentage breakdown of the 295 responses to Question 6.

Two hundred and fifteen of the respondents chose to provide further information.

Most respondents agreed that providing information affects purchasing behaviour and reduces use of water.

They said this with the caveat that labelling only affects an engaged proportion of the population.

Many said that labelling would have limited widespread impact unless water efficient products were cost-competitive.

Also some mentioned the importance of having a clear and consistent label across products.

Several respondents said that labelling would only also be effective if water efficient products were of superior design.

Some respondents did not favour labelling as a single measure and would prefer to see a package of policies.

Several respondents mentioned that labelling could sit alongside a communications campaign or data from smart metering.

Another respondent suggested that market interventions for shower and washing machines should be explored.

A couple of respondents said that the price of water should be higher to reflect its value to society better, and that this should be inherently reflected in product prices.

Q7: To what extent do you agree or disagree that water efficiency labels should be linked to building standards and minimum standards?

There were 294 respondents to Question 7. Of these, the majority strongly agreed that water efficiency labels should be linked to building standards and minimum standards.

Whereas a small proportion slightly agreed or neither agreed nor disagreed with the question. A minority of respondents slightly disagreed or strongly disagreed with the question, did not answer or answered, 'do not know'



Chart 7: proportion of online respondents that responded to Question 7

Figure 7: percentage breakdown of the 294 responses to Question 7.

0%

20%

40%

60%

% of responses to question

80%

100%

Slightly agree Strongly agree There were 172 open text responses providing an explanation for their views.

Most of those who favoured a water efficiency label linked to building standards and minimum standards.

They did so on the basis that this approach would simplify and ensure consistency of regulation.

Representatives from the homebuilding industry strongly agreed on the basis that this approach would emulate what already happens with some appliances with regard to energy efficiency.

Policy Connect cited their recent Bricks and Water inquiry into water use in buildings.

They suggested builders were used to regulation but found it difficult to tolerate unclear and changing government approach to legislation on building standards.⁷

Many respondents also said that linking a water efficiency label to Building Regulations would increase consumer awareness and ensure the usage of the label by developers, as it would be linked to mandatory regulations for new developments.

The majority of respondents from the water industry saw the tightening of building standards and minimum standards to be crucial to achieving reductions in personal water use.

Representatives from the water industry cited research that they undertook which reported that it is 'not possible' to cost-effectively reduce household water consumption below 100 litres per household per day in new developments without changing these regulations.

Others said that Building Regulations must be linked to a label, but with the flexibility to tighten over time to ensure continuous water efficiency improvements.

The Energy Savings Trust provided research which suggested that a label linked to building standards and minimum standards could achieve consumption reductions of 22.3 to 32.2 litres per person per day.

⁷ <u>https://www.policyconnect.org.uk/research/bricks-water-plan-action-building-homes-and-managing-water-england</u>

This was dependent on the level of minimum standards with no significant dis-benefits. Multiple organisations highlighted the importance of a fittings-based approach, citing the Energy Savings Trust report in 2018.⁸

Multiple environmental organisations supported a fittings-based approach. They highlighted the need to base water efficiency standards on a worst-case scenario baseline.

This would help to account for homes being retrofitted with inefficient appliances or the inefficient usage of water-efficient appliances.

Some said that linking a label to building standards and minimum standards is too much government intervention. Several respondents said that the government should focus on fixing pipes first.

Q8: How else could government or water companies encourage people to use more water-efficient devices or appliances at home?

There were 256 respondents to Question 8, which was an open text response asking for additional suggestions on how government or water companies could encourage people to use more water efficient devices or appliances at home.

Most respondents at both an individual and organisational level said that increased communication of water scarcity and the need for water efficiency measures was an important other measure.

Many said that a communications campaign should occur at a national-scale, led by the government, and with consistent messaging across water companies.

Individuals that responded, frequently mentioned the opportunity to advertise water efficiency measures through channels, such as television slots, bill communications or through existing water company outreach networks.

Several respondents also suggested that communications should target behaviour change in the rental sector, on the basis that this is a difficult area in which to achieve water efficiency gains.

Most organisations said that government-led communications at a national level were important to increasing awareness and incentivising behavioural change.

Environmental non-government organisations in particular, and some water companies suggested a two-pronged approach. They said that it would be important to harness

⁸ <u>https://www.waterwise.org.uk/resource/independent-review-of-the-costs-and-benefits-of-water-labelling-options-in-the-uk-summary-report/</u>

community networks and local groups to achieve impact and a wider-reaching national campaign.

The majority of respondents from the water industry showed support for strong government leadership to raise awareness of water scarcity and water efficiency measures and cited existing schemes that they have run.

Several respondents from the water industry said there was an opportunity to integrate communications on energy efficiency and water efficiency, given that hot water can constitute a high proportion of energy usage in the household.

The Energy Savings Trust suggested communications could feed into climate change communications to achieve impact, such as through calculating the emissions reductions achieved through water efficiency measures.

Another frequent suggestion made by respondents was that government or water companies could provide financial incentives.

Many suggested that government could provide tax-breaks for water-efficient devices, or that water companies or government could subsidise their purchase and installation for consumers.

Several respondents and organisations suggested that government could support scrappage schemes to encourage consumers to trade in inefficient products.

Other frequently mentioned options provided by respondents were:

- improved education on water efficiency. Some expressed a view that existing channels could be used to educate consumers and developers such as plumbing networks. Several respondents suggested that water efficiency should be better covered in the curriculum
- a graded billing structure, where the cost of water rises significantly once a consumer passes a set threshold of water consumption
- implementation of metering and smart metering. Several respondents suggested metering should be combined with awareness-raising initiatives
- mandatory efficiency standards for products set by government

Some respondents disagreed that government and water companies should focus on water-efficient devices and appliances at all.

Several people suggested that the focus should be on repairing or bolstering the water infrastructure.

Whilst a small minority of respondents disagreed that government should intervene to change individual behaviour.

Metering

Q9: To what extent do you agree or disagree that people should pay for water according to how much they use?

In total, 298 respondents answered Question 9, 241 of whom gave an additional open text response.

The majority of respondents strongly agreed that people should pay for water according to how much they used.

Whereas a minority of respondents slightly agreed, neither agreed nor disagreed, slightly disagreed and strongly disagreed with the question.

A minority also did not answer or answered, 'do not know'.

Chart 8: proportion of online respondents that responded to Question 9



Figure 8: percentage breakdown of the 298 responses to Question 9.

A majority of respondents agreed that people should pay for the water they used. They viewed this as the 'fairest' way to pay for water, and many said that metering should be universal.

The perception that metering is fair was consistent with responses from the water industry and CCWater, who said that in surveys undertaken within their organisations.

Many respondents agreed with metering on the basis of equity.

It was also frequently mentioned that paying for what you use incentivises:

- behavioural changes
- enhances water sustainability

• encourages greater awareness and understanding of the value of water.

Some organisations cited evidence that metering reduces personal consumption. For example, South West Water research showed that a metered bill reduces customer water consumption by 15%.

However, CCWater suggested that the correlation between meter penetration and lower consumption is not always clear.

Many respondents who were in favour of paying for water by usage said that metering must be accompanied by sufficient safeguards for vulnerable customers.

Vulnerable customers were considered by many to be financially vulnerable, such as those with large households, and those who were suffering from certain medical conditions.

Respondents said that a level of protection could be achieved through social tariffs and/or payment plans that account for vulnerability.

Many water companies responded that they already have measures in place to support vulnerable customers.

Some respondents suggested that a form of graded tariff structure should accompany metering.

One water industry respondent suggested that universally charging by volume may increase consumption and that a positive cultural approach was required.

Some organisations and individuals suggested volumetric block tariffs based around a personal consumption level (110 litres per person per day).

However, there was recognition that blocks would need careful consideration to be set fairly and that these tariffs would require greater demographic data collection on occupancy and vulnerability.

Several respondents said that tariffs should be set according to the levels of water scarcity in the area.

Some organisations suggested that people would like a choice about how they pay for their water.

Q10: To what extent do you agree or disagree that the amount of households charged by metered volume should be increased beyond and/or faster than what is already planned by water companies?

In total, there were 293 respondents to Question 10, of which 216 respondents chose to give an additional open text response that explained their view.

The majority of respondents agreed that the number of households charged by metered volume should be increased beyond what water companies already planned.

A small proportion of respondents slightly agreed or strongly disagreed with the question, whereas a minority of respondents neither agreed nor disagreed, slightly disagreed or did not know.

Of those who provided open text responses, many respondents who agreed that houses should become charged by metered volume faster or beyond what is already planned by water companies.

They did so on the basis that metering was an effective way of reducing personal water consumption and increasing consumer's awareness of water use.



Chart 9: proportion of online respondents that responded to Question 10

Figure 9: percentage breakdown of the 293 responses to Question 10.

Some respondents suggested that charging by volume should be universal. As well as saying that restrictions of charging by volume to water-stressed areas only should be removed, to ensure equality of water charging and greater water conservation.

Some respondents expressed a view that an acceleration of metering could reduce consumer bills and enable water companies to detect and fix leaks.

Many respondents said that metering should be implemented at far shorter timescales than what is currently planned in Water Resource Management Plans.

However, there was either little mention or mixed views about the appropriate rate of accelerated meter penetration.

Similarly, to Question 9, some respondents said that any acceleration of metering should account for the affordability of water under metering. And the impact on vulnerable users, such as:

- the financially vulnerable
- the elderly
- hospital users

There was mixed agreement to this question amongst water sector respondents depending on the cost-benefits of universally metering and charging by volume in different regions.

Some respondents from the water industry disagreed with accelerating metering on the basis that the most cost-efficient metering programmes were already being undertaken.

Those companies in favour of accelerating metering frequently acknowledged the difficulty in achieving widespread or universal metering cost-effectively in some regions, as expressed in response of Water UK (the representative association for water companies):

"...however water metering is a complex issue and whilst we support the ability of customers to make decisions based on the visibility of the amount of water they use and see a reduction in the amount they pay as a result, we acknowledge that in some areas the cost-benefits of universal metering mean it's not necessarily an effective solution.

The need for metering varies by region and it's not feasible to make a national mandate without consideration of these variances."

Some organisations, such as a regional water resources group supported the acceleration of metering. But they highlighted the need to develop a strategy to achieving universal metering in collaboration with industry and consumers.

Other respondents suggested that there is a need for a mix of measures appropriate to their context and customer views.

An alternative view was expressed by an academic institution, who opposed the use of water metering due to the impacts on affordability and on financially vulnerable customers.

They said that water efficiency should not be based on a household's ability to pay for water.

Q11: If you agree that the amount of households charged by metered volume should be increased, what do you think would be the best or most appropriate approach? Do you have suggestions for increasing metering other than what is mentioned above?

In total, there were 197 respondents to Question 11. Most of these respondents supported universal charging using meters led by government or water companies as the way to increase charging by metered volume.

Many individual and organisational respondents suggested that metering could be increased through increasing consumer awareness or advice, such as:

- through educational campaigns led by water companies or by the government
- continuous communication efforts by water companies throughout the metering installation process

Some respondents suggested methods such as water companies implementing and installing universal metering immediately, but gradually moving over to metered charging.

They also suggested that water companies should incentivise meter uptake by consumers and provide opportunities to 'opt-in'.

Some respondents also suggested approaches such as tariffs or subsidies to encourage metering, incentives or rewards for water saving devices and dual billing to encourage people to change to metered charges.

Consistent with the other metering questions, there were frequent concerns that there must be support for vulnerable customers.

It was also frequently said that there should be provision for 'bill shock' as consumers transition over to meters, such as using the phase-in approach to metered billing explained above. Many responses gave additional suggestions for increasing metering which focused around making it easier for individuals and communities to opt in or vote for metering in their areas.

As well as giving them an extended discount or fixed price to incentivise people to opt for a meter.

Q12: Are there any other issues we need to consider with regard to increasing metering?

There were 157 responses to Question 12.

Many respondents re-stated that there should be support for vulnerable customers, in particular for people who use high volumes of water because of medical needs.

There was frequent mention that metering roll-out would need to learn from energy smart meter roll out.

Some respondents suggested that there were practical issues that must be addressed, including:

- challenges over the location of meters and the ease of water companies in reading these
- the quality and accuracy of data and the frequency required to check meters
- maintenance costs of metering
- problems with fitting meters in some properties
- funding of water company metering programmes

Many respondents a said that increased metering should be rolled out in conjunction with increased communications and behavioural change initiatives.

They also said that roll out should be combined with water efficiency measures such as fixing customer side supply pipes or environmental incentives.

A small minority of respondents mentioned the need for smart meters, but with the caveat that protections should be made for data privacy.

Smart metering

Q13: To what extent do you support or oppose use of smart water meters instead of manual meters?

There were 295 respondents to Question 13, which gave respondents a choice to say how much they supported or opposed the use of smart meters.

The majority of respondents supported smart meters over manual meters.

A small number of respondents strongly opposed smart metering or neither supported nor opposed it.

A small minority slightly opposed smart metering or did not answer.

Figure 10 shows the proportion of respondents who support or oppose smart meters.

Chart 10: proportion of online respondents that responded to Question 13



Figure 10: breakdown of the 295 responses to Question 13.

percentage

The majority of respondents suggested that smart metering would facilitate behaviour change to reduce personal water consumption.

Many respondents said that smart meters would improve access to data and information and make it easier to read.

Many organisations highlighted the potential of smart meters for improved leakage detection due to higher data availability, for both water companies and customer-owned pipes.

With some organisations stating that the data would help inform water company activities or decisions.

Some respondents suggested that smart meters would enable customer service, communications and behaviour change and improve the design of tariffs.

Others suggested that they could also allow retrofit programmes to be targeted.

Many respondents said that a roll out of water smart meters must be a long-term goal. And that it should apply the lessons learned from the energy smart meter roll out, regarding both the process and technology.

Some respondents said that smart meter technology for water has not yet been proven.

While multiple organisations said that the definition and type of smart meter rolled out needs to be established as well as potential costs.

Several respondents suggested that smart meters should make the link between water and energy use.

Many individual respondents suggested that there would be costs to using smart meters. Of these respondents, there were mixed views on whether smart meters would increase or decrease costs.

Some respondents raised concerns around smart metering technology, including:

- data security
- potential risks to health such as from a potential exposure to increased carcinogens or fire risks

Several respondents raised the distributional impacts of smart meters, such as the need for users to have Wi-Fi and other technological challenges.

Incentives

Q14: To what extent do you support or oppose use of incentives to encourage customers to use less water?

There were 292 responses to Question 14. The majority of respondents strongly supported the use of incentives to encourage customers to use less water.

A small proportion of respondents slightly supported incentives, whereas a minority strongly opposed or slightly opposed them.

Of these, 226 respondents provided an additional open text response. Most respondents said that incentives were likely to influence behaviour and reduce personal water consumption.

However, some respondents suggested that incentives should be part of a combination of measures to reduce consumption effectively.

Chart 11: proportion of online respondents that responded to Question 14



Figure 11: percentage breakdown of the 292 responses to Question 14.

Organisations that work on water incentive schemes provided evidence that points-based schemes reduce bills by a small percentage.

Some suggested that incentives are a valuable extra communication channel for water companies alongside contact through billing.

Many respondents suggested that schemes that involved or rewarded local communities would help to achieve behavioural change. They said they would be more appropriate than rewards for individuals.

A small number of respondents suggested that individual schemes would be effective if tailored to the individual's circumstances.

Several organisations favoured community scale reward schemes that are connected to the local water environment.

A local environmental organisation suggested that it could be linked to community scale energy saving schemes to offer 'green community' type rewards schemes.

Many of the water company respondents said that they already offer community scale and non-financial incentive schemes. And that they have proved to be successful in driving water using behaviour change.

An alternative response was that there should be incentives for manufacturers and innovators (as opposed to water company customers), to reduce water consumption rates for household and commercial water using appliances.

Some respondents said that they felt that incentives may be relatively short-lived, that people would revert to higher consumption levels over time or that incentives would only affect an interested proportion of the population.

Respondents that viewed incentives to have limited impact frequently said that incentives should be part of a wider package of water efficiency measures.

Some individuals suggested that incentives or rewards should be used to deliver environmental improvements and not promote consumption of other resources.

Those respondents tended to suggest incentives for rainwater capture and reuse technologies

Several respondents who disagreed with incentives were concerned about the costs of these schemes and the impact on bills.

Q15: What incentives could water companies use to reduce customer use of water?

There were 219 responses to Question 15.

Most respondents suggested that financial incentives related to how much water people used would be the most effective possible incentive to apply.

Respondents often suggested that schemes could provide support or discounts to purchase water-efficient appliances or water re-use systems in homes.

These ranged from simple water butts to grey water systems.

Many respondents also suggested that improved communications about how much water individuals use and the need to reduce consumption was required.

Particularly from water companies but also from other organisations and government.

Many respondents suggested that incentives be linked to water saving or environmental outcomes, or outings such as visits to nature reserves.

Some suggested that the incentives should not encourage unnecessary purchases or consumption.

Schemes such as those operated by water companies and Greenredeem were often cited by those organisations as successful.

Many of these schemes were reported to allow customers to choose their own rewards including:

- shopping vouchers
- donations to charities
- donations to local community groups and schools

Several respondents also suggested gamification and competitions to encourage people or communities to reduce consumption.

Some said that incentives and rewards should support initiatives to achieve further water efficiency and/or contribute to environmental improvements.

And that incentives will need to be collaborative with local and national stakeholders.

Rainwater harvesting and water reuse

Q16: To what extent do you support or oppose the use of RWH and GWR schemes at individual level?

Q17: To what extent do you support or oppose the use of RWH and GWR schemes at community scale?

Q18: How can Government or water companies most effectively encourage people to reuse water in their homes?

Due to the consistency of responses throughout Questions 16, 17 and 18, a combined summary is given.

There were

- 298 responses to Question 16
- 292 responses to Question 17
- 243 responses to Question 18
- 215 and 184 respondents respectively choosing to provide an open text response to Questions 16 and 17

There was strong support for measures to increase the use of rainwater harvesting (RWH) and grey water reuse (GWR).

However, there were mixed views on how, and the rate at which, these measures should be implemented.

Some respondents suggested that RWH or GWR would be essential to achieve deeper reductions in consumption in the longer term, and in particular external use.



Chart 12.1: Proportion of online respondents that responded to Question 16

Figure 12.1 percentage breakdown of the 298 responses to Question 16.





Figure 12b percentage breakdown of the 292 responses to Question 17.

The majority of environmental organisations and groups expressed support for RWH and GWR schemes and recommended that the government should do more to encourage their uptake.

Many suggested:

- that the costs involved mean that schemes would be most effective at a community scale rather than at individual property scale
- that the government should provide incentives for their uptake, such as capital grants, and lead by example through adopting these schemes in social housing
- that the installation of RWH and GWR schemes in new properties should be mandated and incentivised through Building Regulations. And that local authorities should do more to promote them using their local plans and the planning permission processes.

Most of the respondents from the water industry were supportive in principle of the schemes, particularly in new developments, but highlighted a range of issues, including:

- many companies suggested that high installation costs meant that retrofitting reuse technology into individual properties was not a cost-effective option. But community scale reuse as part of new property developments could be more attractive
- many said that government would need to tighten the regulatory controls around such technology. For example, by reinforcing and clarifying the requirements of the Water Supply (Water Fittings) Regulations 1999
- many suggested that rainwater harvesting schemes may not provide much benefit during dry weather conditions, which is the period when public water supplies are under most stress

One water company, which hosts multiple rainwater harvesting schemes, said that reuse technology can be a cost-effective solution.

They explained that it is already implementing community-scale wastewater recycling at two of its sites serving new developments.

However, it expressed the view that the current infrastructure charging scheme disincentivises developers from using local reuse solutions.

Some respondents gave qualified support for RWH and GWH. Saying that they were concerned about the potential risks to public health, if these types of schemes are not fitted and maintained correctly, and their costs.

It was frequently mentioned there was greater potential for RWH to be economic, as the complexity of installation was scalable in comparison to GWR.

One organisation suggested that the treatment of greywater to fully remove all shampoo, cleaning products, microplastics from bathroom water before it is used for watering gardens and washing clothes is important.

They suggested that if this cannot be guaranteed, GWR would perhaps be best reserved for flushing toilets.

Specific concerns raised by organisations include:

- one organisation specialising in advice on water regulations said that clarity was required about which regulations apply to the fitting and maintenance of reuse schemes
- they also highlighted that there needs to be clear communications to the public. To ensure that properly qualified fitters and compliant products are used and around the safe operation and maintenance of the systems
- representatives from the bathroom industry stated that there will need to be robust standards in place to regulate installation and maintenance to protect public health
- Water UK provided research evidence to show that community-scale reuse schemes can be effective for external use, but that they are relatively high marginal cost solutions when compared to other demand management options. They also highlighted the need for careful regulation in order to protect public health
- CCWater said any widespread introduction of reuse schemes will need clear governance in place for future maintenance and operation
- representatives from the farming industry reported that the experience of farmers has been that reuse schemes are not financially attractive without the use of incentives or grants
- several organisations raised that a better understanding of the technology's carbon footprint was required

Representatives from the homebuilding industry were slightly opposed to the use of greywater and rainwater systems.

Their objections were due to the ongoing maintenance requirements and the risks to public health.

They also highlighted that developers require clarification of the possible conflicts with regulations.

Which require the principle designer to ensure health and safety is not compromised even after the handover of a new home.

Many respondents highlighted the potential benefits of linking community-scale rainwater reuse schemes with surface water flood management in large-scale developments.

It was suggested that this could also have local environmental benefits and add convenience to the development, which may encourage more sustainable behaviours.

Those who held this view considered community schemes to be a more cost-effective option which could then be used to develop and promote the technologies more widely.

However, some expressed concerns about the responsibility for co-ordinating the ongoing maintenance and operation of such schemes.

There was a variety of proposals for government or water companies to encourage these schemes:

- some respondents suggested reviewing building and/or planning regulation to mandate or promote these schemes, particularly in new developments
- some suggested reviewing regulation, safety standards and training on and the responsibility for installation and maintenance
- some would like to see water charges that encourage the use of non-potable water and local treatment
- many suggested incentives such as grants for developers or homeowners or providing free water butts
- many expressed the view that their use needed clear and tailored messages with education on the benefits of sustainable water use
- some suggested further research on costs and benefits and to look to promote technology innovations

Supply pipe leakage

Q19: Do you have any evidence/views/comments on the potential impacts on water bills for various customers and geographical regions should the management of supply pipes be transferred to water companies?

There were 191 responses to Question 19, which was an open text question.

Many of those that responded were supportive of adoption of supply pipes by water companies, but some respondents explicitly did not favour supply pipe adoption.

Many respondents thought that costs of water to the end consumer are likely to increase if supply pipes are adopted by water companies.

Yet several individuals saw a small increase in cost as acceptable if it makes it easier for pipes to be repaired to reduce leakage.

Those that did not favour supply pipe adoption raised concerns that water companies had a poor record of repairing leaks. And that this would continue if supply pipes were adopted.

The majority of non-water industry respondents were in favour of water companies adopting customers' supply pipes.

A number of these respondents noted that combined with smart metering, such an approach could lead to a reduction in supply pipe leakage.

Those from the water sector showed mixed support for consumer-side supply pipe adoption:

- some water companies were in favour of adopting customers' supply pipes as a way of helping reduce leakage and improving drinking water quality, and were willing to do so if the costs were appropriately funded and timed
- one water company suggested that transferring supply pipes would be in customers' best interests, but highlighted the high costs associated with it and that customers would be unhappy with potential intrusion
- several water companies were not in favour of adopting customers' supply pipes due to the complexities of issues including accountability, access rights, powers of entry and the costs of proactive investment to bring the pipes up to industry standard
- several others said that more research is needed on the likely costs of supply pipe adoption before any policy change should be made
- CCWater cautioned that the cost implications and bill impact for customers of such a policy change needs to be fully understood before it is pursued. Water UK and some water companies cited the evidence regarding the impact of supply pipe adoption on bills for their respective areas. This evidence suggested there could be increases between £1 and £4. Several companies also provided research on customer attitudes which proposed this level of cost increase could be acceptable to consumers
- Some respondents suggested that customers, and particularly the vulnerable, should be protected from increased bills associated with adoption of supply pipes.
- Some mentioned that there are alternative methods to detect and reduce leakage, such as metering, smart metering and incentives or penalties for customers and/or water companies who fail to reduce leaks.
- On the other hand, some respondents viewed it as logical for supply pipe ownership to be consistent with other utilities which typically manage household supply.

Issues that were frequently mentioned by a minority of respondents included:

- potential social issues and points of contention such as access to customer-side supply pipes, and reinstatement during and after supply pipe installation
- the needs to use lessons learnt from the previous adoption of private sewers

Several respondents also suggested that there are problems with the current system for replacing and repairing supply pipes.

Those expressed included problems they had experienced with:

- delays when using an insurance company
- difficulties with finding a contractor to repair the pipe
- difficulties with ensuring pipe repair in rental properties

Q20: Of the alternative options above, which is your preferred? Please explain why or if you have other ideas.

There were 242 responses to Question 20.

Respondents were asked to identify their preferred option for managing supply pipes from options identified in response to the previous consultation in 2013:⁹

- use of metering and/or smart metering
- national policy for a single continuous pipe from main to wall mounted meter box in new build properties, to address leakage
- create a mandatory code of practice for water supply companies (rather than voluntary)
- require water supply companies to assist with maintenance and repair
- voluntary adoption of supply pipes by water supply companies
- water supply companies to run public relations exercise to identify and address problem pipes and clarify property owner responsibilities

Figure 13 shows that the most preferred options were:

- use of metering
- creating a mandatory code of practice for water supply companies
- a national policy for a single continuous pipe from main to wall mounted meter box in new build properties
- a requirement for water supply companies to assist with maintenance and repair

Despite the relatively even distribution of votes across the top four preferred options. Many respondents suggested that a combination of these options was needed.

Chart 13: proportion of online respondents that responded to Question 20

⁹ <u>https://www.gov.uk/government/consultations/future-management-of-private-water-supply-pipes</u>



Figure 13: percentage of options selected by respondents in Question 20.

Some respondents expressed concerns about costs to customers and potential customer opposition to voluntary initiatives by water companies.

However, some respondents also suggested that water companies should adopt supply pipes to identify and repair leaks.

Several respondents also suggested that there should be regulations and requirements for water companies or customers to repair supply pipes within a set timescale.

Some respondents also suggested more investigation is needed into the costs and practical challenges of supply pipe ownership, for example, related to shared supply pipe ownership.

Q21: What other options are available to reduce leakage from customer supply pipes?

There were 135 responses to Question 21.

Respondents were asked if they had any suggestions in addition to those put forward in Question 20.

Many respondents mentioned other ways to improve metering technology.

Those who gave this view frequently mentioned the potential of smart meters to:

- raise consumer awareness
- better leak detection from increased penetration
- better interpretation of metering data

Some respondents expressed the view that the onus should be on the company to inform customers and help with repairs with water companies taking more ownership of supply pipes.

Many respondents also mentioned:

- the potential for improved flow and network monitoring
- proposals included using experts to check households annually
- installing sensors at external and internal stop taps
- installing fixed noise loggers to pick up leaks from both customer and company supply pipes

Some respondents also thought that it required:

- standards or improvements for existing fittings and new connections
- ideas included supply pipes being continually retrofitted
- all fittings being regulation compliant.

Some respondents viewed financial incentives as a way of reducing supply pipe leakage, including insurance, grants or subsidised repairs or fining those that do not fix leaks.

Some also mentioned the need to increase public education on the importance of reducing leakage, and on how to identify household leaks.

Several respondents thought leak repair technology was important, with the lining of pipes or a product that can be flushed through to repair leaks being a common theme in these responses.

Other suggestions made by individuals included community leak detection volunteers, regular maintenance of pipes, and renationalisation of water companies with greater investment to upgrade the water network.

Communications and behaviour change

Q22: What are the main barriers to changing behaviours to reduce personal water use? Please rank your top three options by order of importance.

There were 281 responses to Question 22.

Respondents were asked to rank the importance of barriers to reducing personal water use from the following options.

276 of the respondents, ranked the options provided or responded to the 'other' category.

The options provided to respondents were:

- insufficient access to support and advice
- insufficient information about personal water usage
- insufficient information about water scarcity
- lack of financial incentive
- investment in more water efficient equipment is prohibitively expensive
- difficulty in changing habits
- people feel they are already doing all they can to reduce water use
- hygiene reasons
- other (please specify)



Chart 14: proportion of online responses by total that responded to Question 22

Figure 14: percentage of options selected by respondents in Question 22, divided by ranking.

Figure 14 shows the total number of votes for each barrier and the importance that respondents allocated to them (rank 1 being most important).

The top three ranked barriers to changing personal water use were:

- 1. insufficient information about water scarcity
- 2. lack of financial incentive
- 3. insufficient information about personal water usage

There was no clear predominance of first, second or third choice.

A high proportion of respondents chose insufficient information about personal water use, insufficient information about water scarcity, lack of financial incentive and difficulty in changing habits as one of their choices.

Some respondents suggested that communications campaigns would be ineffective as the public were not motivated enough to reduce water consumption and that most people consider that they are water efficient.

Several respondents raised the mistrust of messages disseminated by water companies and the government.

Several respondents thought communications would not be effective due to:

- the problem being too big for personal water efficiency measures (leaks should be fixed first)
- water not being sufficiently expensive
- there being a lack of financial incentive

Q23: Which organisation(s) (if any) should communicate about how to reduce personal water use? Please select all that apply.

There were 290 responses to Question 23 and of these 162 respondents provided an additional open text response.

Most respondents said that it is not the responsibility of just one organisation to communicate how to reduce personal water use.

The vast majority of respondents said that communications should be the responsibility of either the water company, the government and/or local government.

A substantial proportion of respondents also thought it should be the responsibility of environmental non-government organisations.

Other organisations mentioned, many respondents thought communications should be the responsibility of:

- industry
- building developers
- manufacturers
- retailers.

Many also thought it should be the responsibility of the education sector to communicate these messages.

Respondents who gave an open text response expressed the view that communication of reducing personal water use should be the joint responsibility of:

- water companies national government
- local government
- environmental non-government organisations

A small minority of respondents said that communicating water efficiency is not anyone's responsibility.

These respondents thought that water consumption should be reduced in the nonhousehold sector first or that access to water is a human right. The majority of organisations who responded said that focusing on other policies alone will not reduce household water consumption unless accompanied by broader public engagement to change water-using behaviour.

Most organisations viewed that there should be a multi-stakeholder approach to raising public awareness and education, and some suggested that government should play a leading role in this.

Some respondents gave suggestions for improving public engagement on water efficiency, including:

- government introducing scrappage schemes to incentivise households to trade in water-inefficient devices, similar to the current boiler scrappage scheme
- a government led national strategy that communicates the importance of water conservation and raises awareness about water scarcity
- water conservation becoming part of the national curriculum

Some respondents gave other views, such as suggesting that:

- every public body and private company should have a water efficiency policy
- there should be collaborative messaging approach from all organisations to show join up between government and industry

Many water industry respondents mentioned linking the introduction of mandatory water labelling to communication and public information so that households can make informed choices.

A minority of respondents said that regional partnerships were important in enhancing the promotion of water efficiency, such as between neighbouring water companies.

Of those that gave these views, some suggested that water efficiency messages are often more likely to be acted upon by water users when they come from 'trusted voices'.

For example, if water companies partnered with external bodies and environmental NGOs to deliver these messages.

Q24: Any other matters to raise.

There were 143 responses to Question 24.

Responses were wide-ranging, but the most common theme was reducing non-household consumption.

Of these respondents, many favoured a consultation, similar to this, for the non-household sector.

Some respondents repeatedly raised concerns over specific non-household water users, such as fracking

Many respondents suggested the need:

- to fix leaks on customer property and supply pipes
- for better technology and bathroom fittings
- to fix leaking toilets
- the need to work with manufacturers to prevent fittings from leaking

Many said that there is a need to ensure the Water Fittings Regulations are fit for purpose, effective, and remain so for a suitable length of time.

Some respondents proposed that Building Regulations should be improved.

Water companies reiterated that the government should progress mandatory water efficiency labelling of water-using products in association with Building Regulations.

Some respondents said that education on reducing water use should be explored, including proposals to raise awareness through:

- the national curriculum
- wider marketing strategies
- educating installers of water using products

Some suggested the importance of local and community initiatives to change water use culture.

Some respondents said that there should be greater join up of regulation.

For example, suggesting that the Environment Agency and Defra are working to protect sources and highlight water scarcity.

Whereas Ofwat's aim to promote efficiency by water companies in their work - and therefore keeping water bills low – can be seen as conflicting.

Some respondents said that the regulators are not doing enough. However, many respondents highlighted the opportunities for government to link water conservation messages to the energy saving strategy.

As well as the wider benefits of reducing carbon emissions.

A small minority of respondents said as many measures as possible should be taken to protect the environment.

Several respondents suggested that population growth and therefore water consumption should be reduced through reduced immigration.

Annex A: List of responding organisations

This list of responding organisations is not exhaustive. Rather, it is based on those that declared their organisation. This may include responses from individuals who are members of specific organisations and therefore does not necessarily reflect that organisation's views.

This list also does not include those that asked their response to be kept confidential.

- Action for the River Kennet (ARK)
- AgilityEco
- Albion Water
- Anglian
- Baringa Partnership
- Bathroom Manufacturers Association
- Bristol Water
- BSH Home Appliances Ltd.
- Building Merchants federation
- Campaign to Protect Rural England (CPRE)
- Centre for Competition Policy
- Centre for Water, Communities and Resilience, University of the West of England
- Chorleywood Residents Association
- Consumer Council for Water (CCWater)
- Energy Saving Trust
- Environmental Economics and Central Hertfordshire Green Corridor Group
- European Bathroom Forum and Unified Water Label
- Friends of the Lake District
- Global Procurement Co. Ltd (GPC)
- Greater London Authority (GLA)
- Groundbreaker and Firebreaker Systems
- Groundwork London
- Groundwork Colne Catchment Action Network (ColneCAN) partnership
- Hastoe Housing Association
- Herts & Middlesex Wildlife Trust (Host of the River Lea Catchment Partnership)
- Home Builders Federation
- Impress the Chess
- Indrain Consulting Ltd
- National Energy Action (NEA)
- National Farmers' Union
- National Trust
- Neoperl UK
- NHS Lanarkshire
- Northumbrian Water Group

- OTA Water
- Partnership for South Hampshire (PfSH)
- Policy Connect
- Portsmouth Water
- Proport Eco-Services
- Pupils to Parliament
- Royal Horticultural Society
- Sebata Holdings
- Severn Trent Water
- Smart DCC Ltd
- South Cumbria Rivers Trust
- South Derbyshire District Council (Officer Response)
- South East Water
- South Staffs Water
- South West Water
- Spelthorne Council
- Sutton and East Surrey (SES) Water
- Test Valley Borough Council
- The Wild Trout Trust
- TWENTY65 Grand Challenge for Water (University of Sheffield and partners).
- UK Rainwater Management Association
- University of Exeter
- Water Regulations Advisory Scheme Limited
- Water Resources East
- Water Resources South East
- Water UK
- WaterSafe Installers' Scheme Limited
- Waterscan Ltd
- Waterwise
- Waterwise Water Efficiency Strategy Steering Group
- Wildlife & Countryside Link
- Woodhall Estate
- WPL Ltd
- WSP Engineering
- Yorkshire Water Services Ltd