



Response to the government consultation on Storm Overflows Discharge Reduction Plan

Introduction

The Grayling Society was formed in 1977 to promote Awareness, Conservation and Angling for Grayling. We are now an international organisation with over 800 members in the UK endeavouring to protect a game fish particularly susceptible to pollution. I intend to deal with the issues raised in this consultation in the order in which they are raised.

History

The problem being addressed here can trace roots back to Tudor Times and probably before when human effluent being deposited in rivers was as familiar then and as revolting as it is today. The Great Stink of 1858 and the continual practice, since then, of allowing raw sewage to be dumped into rivers has never been stopped. This is not the first Government, as is being claimed, to take action to address this matter. In 1980 it was a Conservative Government that decided the solution was to privatise the water companies, washing their hands of the issue. Thus, allowing foreign investors (70% apparently) to virtually dominate the industry, taking significant profits while continuing to pump filth into our rivers, avoiding capital investment in the processes that the public are paying them to carry out. The main issue of the necessity to separate rainwater from sewage is not an innovation, it has been clear for decades and little has been done.

Submission

Having said that, it is welcomed that these steps are at long last being taken to solve the problem and targets are being set for all concerned to achieve. We all want to see our Rivers restored and to leave the environment in a better state than we found it. However, the time limits being proposed are far too long as 28 years is an inordinate period. Furthermore, this process should not be influenced by the irrelevant five-year financial cycles of the perpetrators of the excrement dumping. This timeframe appears to be taking into account the objectives of the water companies to be able to produce profits each year, pay dividends and keep the Country waiting for a clean environment. Sewage outflows, even in Victorian times, when many were designed, were only ever intended to be used when rainfall exceeds capacity (hence the name Storm Overflows). Since privatisation, the use of these overflows does not relate at all to the weather. Their use is governed by the water companies' directors, site managers and policy decisions to discharge raw sewage into waterways regardless of the weather as an additional and cheap way of disposing of it. This has been done cynically to avoid investment to do the job properly and while being aware that rainwater ought to be separately dealt with. No one can disagree with the statement that sewage should not be in our rivers and the Environment Agency (EA) and OFWAT must



agree. The situation we face of hundreds of thousands of incidents each year is glaring evidence of the failure of both institutions. The EA is responsible for monitoring water quality as well as regulating waste, their permit system is useless when water companies totally disregard them, and the EA takes action in relation to a very small number of breaches. The statement that the EA tests evidence against the interests of the public and acts proportionally when they apply the Law is no more than an excuse for inaction due to years of underfunding and lack of resources. These current proposals must include plans to increase EA budgets to cover the essential monitoring and enforcement work that is clearly needed. The OFWAT maximum penalty of 10% of the company's turnover must be increased as the water companies' accountants can factor that figure into their budgets each year to make it worth risking the penalty balanced against the profits to be made from dumping filth into our rivers. This restriction is an ineffective deterrent to prevent illegal discharges.

The suggestion that 3.1 billion pounds is enough investment over five years, nearly half of which has already passed, is insufficient baring in mind that 1.9 billion is being invested in one river and the rest mainly in investigations. The time for investigations is passed, sewage should not be being discharged at all into Rivers and rainwater should be separated from sewage treatment, which is a sufficient conclusion for all those investigations. The time being suggested for another year to monitor overflows just amounts to unnecessary delay, the end of the current year is too long. Whilst the Environment Act and these proposals are welcomed, as far as they go, the timeframe being suggested is unsupportable. 28 years means that a large proportion of the population will not survive to see it and will live the rest of their lives suffering these disgusting practices, with steps being taken but at a slow pace. The Government must rethink this timeframe and shorten it with tougher measures if necessary. Part of those measures must be to immediately ensure that all sewage discharges are monitored forthwith as currently 20% of them are not.

The government statement *"Water companies will have a key role in reducing discharges from Storm overflows"* equates to *"Shop lifters will have a key role in reducing thefts from supermarkets"*. The perpetrators of the misconduct need to be sanctioned not allowed to choose when they will stop, therefore the proposed government measures are too weak. The solution to the problem is being magnified with threats of digging up cities when what needs to be done as a priority is diverting rainwater from sewage treatment. Rainwater is not the problem as it is clean and an asset to us all, concentrate on diverting it away from sewage treatment, store sewage in tanks not rainwater. As the Government rightly points out Storm overflows must be eliminated but sooner than Government policy and this consultation proposes.

The Government seem to have concentrated on bathing waters which is actually a political distraction either Rivers are clean, or they are not, irrespective of whether humans are to



swim in it, wade in it, paddle over it, fish in it and for that matter allow their dogs to fetch balls from it. Obsessing about rainfall and climate change are other distractions and over complications as the Government clearly recognises that rainwater must be separated from sewage therefore it will not be at all relevant how much it rains. Finally, the Government do not appear to have suggested funding the prosecution of those ultimately responsible for breaches of the Law, probably starting with the chairs of the water companies who have the ultimate liability for corporate offending.

Conclusion

The overall intentions and objectives are for the most part right, the timings are wrong. They are being influenced far too much by the organisations responsible and how they will respond. The Government must rethink the targets for achieving this clean up and recommend faster moving reform. The Government must also look at improving the efficiency and funding of the Environment Agency and OFWAT to help facilitate faster results for the objectives. The public's support ought to be promoted, think more about what they flush down the toilet. These time limits being shortened may cause rapid curtailment of water company profits but that is unfortunate, they cannot be allowed to still take dividends of any sort while those monies are being made or contributed to by the medieval practice of discharging human excrement into waterways.