
“Public waterways are a great resource enjoyed by many children and adults and can have a significant positive impact on our health. Whilst there will always be challenges with the efficient management of sewers and sewage treatment works, minimising the entry of human organisms that can cause harmful infection should be a major priority”

Professor Sir Chris Whitty FRS FMedSci Chief Medical Officer for England

Dear Sir Jon,

The Clean Water Sports Alliance is pleased to be able to provide evidence to the Water Commission, in support of its independent review of our water sector.

This is an incredibly important moment for all involved. It is a long overdue opportunity to reset the relationship between the sector, regulators, investors, customers and all those who enjoy our waters and seek to protect them.

The Clean Water Sports Alliance represents 11 National Governing Bodies in England, 7 in Northern Ireland and 4 in Wales. Across the UK, water provides the playing fields and pitches for millions of recreational users; from paddlers to swimmers, rowers, triathletes, sailors, divers, anglers and many more.

In the last decade, participation in paddling has risen from around 1.5m to 7.7m. Over 2m Anglers fish and spend time in the water environment each year. Sport England's Active Lives Survey, estimates that approximately 4.4 million adults participated in open water swimming between November 2022 and November 2023. Over one million people a year surf in the seas around the UK coasts. In 2022, 13.2m people participated in some form of boating activity in the UK.

Almost half of Great Britain's Olympic medals at Paris 2024 (47%) came from water-based sports, with 18% of these won by athletes who train outdoors.

Recreational users of water make up a significant proportion of our population and are directly impacted by the actions of polluters. To date, as a community, we have had limited say in how our water sector is managed. We hope that through the work of the Commission, protection of public health will be considered a much higher priority.

The health advantages of being in, on or close to blue spaces are increasingly well researched. The presence of water bodies provides opportunities and motivation for engaging in various forms of physical exercise and natural water settings are proven to provide restorative experiences, helping to alleviate mental fatigue and promote relaxation.

Unfortunately, water pollution has become the number one concern amongst water users. The cycle of negative news and media coverage is having a direct impact on participation and member retention.

Our water sports community is deeply concerned that people's health is being put at risk, when doing the activity they love. From grass roots to elite training and competition, water sports providers are having to adapt to a new norm, where they not only need to check the weather forecast, but also a live discharge map.

While the availability of information through national and regional discharge maps has improved in the last 12 months, the sector is still not able to provide information on the content or quantity of discharges, and therefore their impact, or potential impact, on human health. Confidence in the data is also low.

Priorities of the Clean Water Sports Alliance

In responding to the Water Commission call for evidence, the Clean Water Sports Alliance has been guided by its three core priorities:

1: Go further, faster on pollution. Improve the health of UK waters by 2030 by holding polluters accountable for their actions. Government to reassess targets, increase funding and direct regulators.

2: Enable people to make real-time informed choices: Protect our participants and athletes. Accurate access to real-time water quality information all year.

3: Recognition of all recreational water users across decision making and policy. Ensure the voice of recreational water users are heard when making our waters fit for use.

The Clean Water Sports Alliance would like to see the Commission make recommendations that recognise the importance of recreational use of water by people.

We would like to see a clearly defined 'public health' objective that considers the following:

- Greater prioritisation given to interventions that address the direct risk posed to public health by microbial and chemical pollutants.
- Further reform of governance and regulation of water companies, creating purpose-led organisations that are transparent and compliant with the law.
- Accelerate the use of innovative technologies as part of a nationally coordinated environmental monitoring strategy.
- Introduce more ambitious catchment management systems that include recreational users in decision making.
- Strengthen duties placed on water companies to provide access for recreational opportunities.

- Funds generated from fines and penalties should be ring fenced and reinvested into projects that protect and restore the water environment.

Greater prioritisation given to interventions that address the direct risk posed to public health by microbial and chemical pollutants.

Public health is being put at risk from exposure to high concentrations of faecal organisms. Even mild cases of illness can have impacts beyond the direct health effects, for example, economic impacts from increased number of sickness absences from work or losses for tourism-based businesses near waters used for recreational activities.

In addition to these short-term public health risks, the exposure of recreational water users to human faecal organisms resistant to known antibiotics poses a longer-term risk to public health. Much more work needs to be done to both understand and mitigate these risks upon the public.

The Clean Water Sports Alliance has been pleased to see that, following a consultation, the Government has committed to modernise our outdated bathing water regulations. More people than ever want to be in, on or alongside our waterways, to relax, to explore, to spend time with friends and, importantly, to stay healthy. While this is a welcome step forward, it must be remembered that designated bathing water sites make up a tiny proportion of our inland and coastal waters.

To that end, in the short term, restrictions in the use of emergency overflows in areas regularly used for water sports would begin to extend the protections afforded to bathing sites. Identifying locations that have high recreational value, or that are regularly used by the public, would help to create a picture of where interventions should be prioritised.

There should be clear consequences for water companies and their chief executives who fail to comply with a clear duty to protect the water in which people practise water sports.

Longer term, the apex target has to be preventing the discharge of pollutants that can cause harm to the environment and people's health.

The Clean Water Sports Alliance recognises that our inland waters are natural environments and will therefore never be entirely 'clean'. We believe, however, that the target must be to ensure that the health of the public is not placed at risk as a result of the actions of the water sector.

Further reform of governance and regulation of water companies, creating purpose-led organisations that are transparent and compliant with the law.

Water companies need to rebuild public confidence and trust - particularly with water users. They must demonstrate they are acting in the best interests of the public and the environment. This will hinge on two factors, compliance with the law (as a minimum) and transparency in how they are operating in a socially responsible way.

While data has become more available from the water sector, confidence still remains low. Information on how the sector is performing remains complex. Companies should be required to implement an open book approach to reporting on their performance (particularly on discharges and abstractions and how these relate to permitted levels and their carbon emissions); on their investment programmes (covering asset condition, what they are spending money on and where); on corporate structures and on executive pay.

Water companies should also be required to have clear purpose statements founded on common principles including fair prices for water, service reliability, customer and employee engagement, sustainability, environmental performance and, importantly, their contribution to wider social value.

Accelerate the use of innovative technologies as part of a nationally coordinated environmental monitoring strategy.

Countless hours are invested each week by volunteers across the country, testing and recording the health of our waterways. The lack of a single, standardised methodology and database is a huge missed opportunity to vastly upscale our data collection capabilities.

A nationally coordinated approach to water quality monitoring could unleash the potential of tens of thousands of trained citizen scientists and be more cost effective than solely relying upon Environment Agency resources.

The UK should aim to be a leader in monitoring and modelling technologies, developing the use of AI, machine learning, data interrogation and digital twin technology. This would help companies to better understand infrastructure asset health and performance, as well as river systems, proactively. A UK centre of excellence could be established with research and technology institutions to develop and export expertise and innovative solutions to the rest of the world.

As mentioned, the public health risks associated with the exposure of recreational water users to human faecal organisms resistant to known antibiotics needs further research. UK research and innovation should support multidisciplinary research to better understand faecal microbial behaviour and antimicrobial resistance in inland and coastal waters and develop better monitoring technology for near-real-time monitoring of faecal organisms and other microorganisms of human concern in waterbodies used for recreation.

This could better support policymakers and water service providers in taking a risk-based approach, identifying priority sites for improvement and informing where certain interventions should be targeted.

Lastly, increasing the capacity of regulatory and engineering skills will enable better delivery of the interventions and resource the monitoring and enforcement of water quality targets. Collaborative efforts between government bodies, regulators, and water service providers should allocate resources towards recruiting and developing skilled staff.

Introduce more ambitious catchment management systems that include recreational users in decision making.

Multi stakeholder, collaborative approaches are known to be beneficial, however the present Catchment based approach is underfunded and lacking authority to address the scale of the challenge. While there are some successful examples, Catchment Partnerships are broadly all set up differently. They lack any real teeth and can be a way of giving the perception that stakeholders are part of the process.

There is little engagement with recreational users through CaBa. Where there is engagement, this is mainly led by local angling clubs. There is a real opportunity to engage with a much wider audience of recreational users to really amplify the voices and actions of local people for the benefit of the water environment.

The theory behind CaBa is broadly sound, therefore we believe there is merit in implementing a strengthened catchment management approach which brings together the most appropriate authorities, regulators, businesses, landowners and stakeholders across food, farming, energy, nature, health, infrastructure, finance, local and national government and importantly, recreation.

These strengthened bodies should be overseen by independent stakeholder management boards, and independently chaired, they should develop overarching and coherent investable plans for local and regional water management priorities at appropriate spatial scale. They should draw from existing plans and frameworks (land use, flood risk, water resources, nature recovery).

Water companies need to rebuild public confidence and trust - particularly with water users. They must demonstrate they are acting in the best interests of the public and the environment. This will hinge on two factors, compliance with the law (as a minimum) and transparency in how they are operating in a socially acceptable way.

While data has become more available from the water sector, confidence still remains low.

Information on how the sector is performing remains complex and impenetrable for members of the public to access and understand.

More must be done to ensure that companies are required to implement a clearer, open book approach to reporting on their performance (particularly on discharges and abstractions and how these relate to permitted levels and their carbon emissions); on their investment programmes (covering asset condition, what they are spending money on and where); on corporate structures and on executive pay.

How catchment management bodies interact with their coastal counterparts in the Coastal Partnerships Network needs careful consideration, to avoid regulatory confusion at the inland / coastal boundary. Further, not all areas of the coast have a coastal forum or partnership in place, and their funding is varied and, in many cases, tenuous. This is particularly true where funding is from local authorities who have their own financial challenges. Again, formalising the need for such multi-stakeholder groups would increase their influence and effectiveness.

Strengthen duties placed on water companies to provide access for recreational opportunities.

[The Water Industries Act 1991 S.3 \(3\)\(a\)](#) includes a requirement for water companies ‘to have regard to the desirability of preserving for the public any freedom of access to areas of woodland, mountains, moor, heath, down, cliff or foreshore and other places of natural beauty’. [Section 5](#) of the Act sets out the powers held by the Secretary of State in relation to the codes of practice for conservation and recreation. [The Code](#) that is referred to in Section 5 remains active statutory guidance, under [The Water and Sewerage \(Conservation, Access and Recreation\) \(Code of Practice\) Order 2000](#)

It is unclear how or even if these duties are observed by the water sector and what oversight the Secretary of State has of action taken against this duty. There is a lack of consistency in how water companies make their land and water available and their policies towards public access.

The [WISER](#) (Water Industry Strategic Environmental Requirements) sets the environmental goals and expectations, while [WINEP](#) (Water Industry National Environment Programme) translates those goals into specific, actionable programmes.

WISER says “Water companies should take opportunities to improve the landscape, heritage, access and recreation outcomes linked to their duties under the Water Industry Act 1991. WISER also states there is an expectation for:

“action that delivers inclusive public access to water company land and water of natural beauty, amenity or recreational value and allow public access for the widest possible range of activities”

It is unclear how this strategic action translates into the WINEP or what measurable actions are taken by the water sector to deliver ‘inclusive public access to land and water...’.

The Clean Water Sports Alliance believes that a strengthening of the wording within the current legislation would place a greater onus upon water companies to expand opportunities for recreation, not just ‘preserve’. Wording should also be updated to specifically include the water and the ‘CAR’ guidance updated accordingly.

National associations such as ours are well aware of the challenges with risk, liability and safety and are well placed to work closely with the sector to co-design safe mitigations to cope with operational assets and unseen hazards.

Water companies should also be required to produce a plan for providing more public recreation opportunities as part of their AMP submissions.

Funds generated from fines and penalties should be ring fenced and reinvested into projects that protect and restore the water environment.

Money raised through fines and penalties should be ring fenced into the ‘Water Restoration Fund’ to spend on projects that would tackle sewage spills and improve river quality. The

money should be allocated toward reversing the damage that has been done to our rivers, and not diverted into HM Treasury.

Summary

The Independent Water Commission has been tasked to make recommendations to the UK and Welsh Governments to ensure that the water sector regulatory framework delivers eight outcomes. Objective 1 calls for “...*clear objectives for future outcomes and a long-term vision to support best value delivery of environmental, public health, customer and economic outcomes*”

Members of the public are stakeholders, not only because they are customers, but because millions of people live, work, commute and recreate in and alongside our waters every single day.

The Clean Water Sports Alliance is strongly advocating for a clear ‘public health’ objective, to both extend greater protections to human health and to maximise the opportunity for recreation and leisure.

The Clean Water Sports Alliance is therefore urging the Commission to consider a ‘Public Health Objective’ to include:

- Prioritisation of interventions that monitor and reduce microbial and chemical pollution.
- Reforming water sector governance to acknowledge the wider societal impact their operations have.
- Accelerating the use of innovative monitoring technologies and harnessing the cost savings and resource capacity offered by citizen science.
- Strengthening catchment partnerships, ensuring recreation has a voice.
- Strengthening duties placed on the water sector to provide recreational access.
- Reinvesting fines and penalties into water restoration projects.

We look forward to reviewing the interim recommendations published by the Commission in May.

Kind regards,

The Clean Water Sports Alliance

Paddle UK

British Rowing

The Angling Trust

British Triathlon

Royal Yachting Association

Surfing England

Swim England

British Sub Aqua Club

British Kitesports

GB Outrigger

British Dragon Boating