Comment Receipt

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Introduction to drought management (Section 1 – Introduction)

Section 1 gives an overview to drought management for Head Office Environment Agency.

Question 1: Does this section provide you with a broad understanding of how and why drought happens? If not, please tell us if there is additional information we should consider.

The description on how and why droughts happen provided in this section is not sufficiently clear as it omits the definition of drought itself. In fact, by using the general term ‘drought' in this context, it is not apparent if the Environment Agency is referring to hydrological drought or water resources drought. To add clarity and deliver a comprehensive description that conveys the complexity of the conditions under which drought occurs, Waterwise suggests the inclusion of a drought definition in this introductory section.

Question 2: Does this section provide you with a broad understanding of how drought affects people, business and the environment? If not, please tell us if there is additional information we should consider.

This section provides a great understanding of the severe impact of drought on people, business and the environment. Although, Waterwise recommends adding to the plan arrangements to deal with wider impact on power generators and the cascading failure that can arise from a energy shortage or blackouts.

Drought triggers and actions (Section 3 – Drought triggers and actions)

Section 3 sets out the management actions our drought teams will take to prepare for drought, during drought and after drought.

Question 3: Are our triggers and corresponding actions described clearly so that you know when and how we act, and that you know we have built in enough flexibility to manage any drought as it develops?

Triggers and actions in section 3 are, in our view, clearly described. As mentioned above (see answer 1), Waterwise recommends clarifying what the Environment Agency means when using the term

drought in this context. With water supply drought lagging hydrological drought, it is important to explain whether this plan would apply to both hydrological and water resources or only to one of them.

Question 4: Please tell us if there are any other actions that we should consider as part of our management of drought in Head Office.

Waterwise welcomes the comprehensive set of triggers and actions set out in this drought plan. As mentioned above (see answer 2) we recommend adding a course of action to protect the power supply from the impact of drought.

Our drought plan refers to drought monitoring we carry out in addition to our routine monitoring networks.

Question 5: Do you think that the information on environmental monitoring across our drought plans shows that our drought surveillance is appropriate to the risk of drought? Please tell us if there is any additional information you think we should consider.

Waterwise welcomes and supports the monitoring measures set out by the Environment Agency in this section. We further recommend that this programme be clearly linked with water companies' drought management plans. If these are taken separately and fail to align, there is a risk that the drought management on the ground could be negatively affected in terms of both monitoring and communications.

Question 6: Do you think it will help us to deal effectively with the impacts of drought? Please tell us if there is any additional information you think we should consider.

Waterwise believes that the monitoring plan set out in this section will help dealing effectively with the impact of drought, provided that the Environmental Agency and the water companies' plans are synched up and complementary.

Drought permits and drought orders (Section 5 – Drought permits and drought orders)

Drought permits or drought orders are granted either by the Environment Agency or government ministers. They help to maintain public water supplies or protect the environment where there has been an exceptional shortage of rain. Section five sets out how our drought teams and National Permitting Service deal with drought permit applications and respond to ministers on drought order applications. It also explains the situations where we might apply for drought orders to protect the environment.

Question 7: Please tell us if this section sufficiently explains how we will deal with applications for drought permits and orders.

The section explains in a clear manner how the Environment Agency deals with the applications for drought permits and orders, although it does not describe how the Environment Agency balances the environmental concerns with the supply demands. Furthermore, Waterwise suggests that the Environment Agency should set out incentives for water companies to avoid applying for drought permits.

Communication during a drought (Section 6 - Drought reporting and communications)

Drought communications are an important part of drought management. This section sets how we will let others know what we are doing and how we work with others during a drought.

Question 8: Is there is enough information on how and when we will communicate with our staff, our partners and abstraction licence holders during a drought? Please tell us if there is any additional information we should consider.

Waterwise very much welcomes the stress that the Environment Agency is putting on promoting constructive communication amongst all parties on droughts. We have a few suggestions for things that, in our view, could be added or clarified in this section:

1. As part of the external communications plan the Environment Agency aims to ‘support water companies in promoting water efficiency to consumers business and industry'. Whilst Waterwise welcomes this initiative and recognizes the value in supporting the efforts that water companies are already making promoting water efficiency to consumers, based on our experience over the last few years, we have concerns that water companies may lack the capacity to fully engage with businesses during drought. Waterwise would therefore suggest that, rather than supporting the water companies communications plans, the Environmental Agency could provide them with assistance in facilitating collaboration with businesses. **[Ref. Section 6.2]**

2. Is the co-ordination of drought management communications at national and regional level limited to within the Environment Agency, or does it involve a wider coordination effort to facilitate harmonic communications on drought between water companies and other relevant organizations? **[Ref. Section 6.2]** Waterwise recommends this type of coordination to align efforts to prevent and deal with drought. There seems to be an enthusiasm for collaboration between parties on drought and water efficiency at the moment. Waterwise would welcome the prospect for the Environment Agency to have a more relevant role in such a coordination of communications between parties on droughts.

3. It is not clear whether the objectives to ‘maintain awareness of water situation' and ‘promote water efficiency to consumers' as part of the external communication objectives refers only during the droughts or all the time. **[Ref. Table 5]**

4. Finally, Waterwise recommends adding:

a) The European Union, Scotland and Northern Ireland to the list of governmental external audiences **[Ref. Table 6].**

b) WWF to the list of environmental NGOs. **[Ref. Table 6].**

c) Energy consumers to the list of consumers affected by drought. **[Ref. Table 6].**

d) Waterwise to the list of relevant NGOs under 'interested parties' in **Appendix B1**

Working with others

Our plan identifies some areas where we plan to work with others in managing drought.

Question 9: Do you have any views on how we might engage and work better with groups and organisations to manage future droughts and promote the protection of the environment?

Waterwise welcomes the Environment Agency plan to work with a range of organizations and industries in managing drought. A broad collaboration between sectors is, in our view, instrumental for effectively addressing water efficiency and drought concerns. Waterwise has been working with the Horticultural Trades Association (HTA) to facilitate such collaboration and communication across sectors (i.e. water industry, the Environment Agency, Defra, consumer associations, gardening industry and environmental NGOs) particularly around hosepipe bans and more generally on restrictions on water use. A standardized and coordinated approach to hosepipe bans across the UK would definitely be a more effective way to manage this problem. Furthermore, Waterwise set up the SWAN initiative to establish consistent messages on water efficiency amongst water companies and deliver proactive and reactive messages in the media. Waterwise also recommends engaging with the EU, Northern Ireland, Scotland; while the Environment Agency is responsible for England and Wales, drought is a global issue and as such it should not be taken in isolation.

Additional information

Question 10: Please tell us if you have any other views or comments to make on this plan that have been not been covered by previous questions.

Waterwise praises this ambitious Environment Agency drought plan and is optimistic that, if implemented - and in combination with our suggestions - it will deliver an effective management and prevention of droughts while reconciling the interest of the environmental and water demand. Although, Waterwise is concerned whether the Environment Agency has adequate resources to implement such an ambitious plan (especially in the communications), considering the cuts that have taken place within their water resources team.

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