

17 June 2009



The Consumer Council

Consultation on the Draft River Basin Management Plans for the North Western, Neagh Bann and North Eastern districts.

1. The Consumer Council is pleased to respond to the Northern Ireland Environment Agency's (NIEA) consultations on the Draft River Basin Management Plans for the North Western, Neagh Bann and North Eastern districts.
2. The Consumer Council was set up by Government in 1985 and is funded by the Department of Enterprise, Trade and Investment (DETI).
3. Our job is to speak up for consumers and give them a voice. We also ensure that the policy makers in Northern Ireland hear that voice and take it into account when they are making decisions that affect us all.
4. We do this by running information and education campaigns, influencing the public and private sectors, undertaking research and producing publications. We also help individual consumers with complaints about buses, trains, planes, ferries, natural gas, electricity, coal and water.
5. The Consumer Council's approach to this consultation is to concentrate on the areas of cost and public participation as there are better equipped organisations with greater knowledge and experience to respond to the environmental elements of the documents. However, we would strongly advocate that any decisions made to implement schemes are evidence based through robust analysis to ensure that they deliver tangible benefits.
6. The Consumer Council is aware that the Northern Ireland Executive (Executive) is currently considering the future of domestic water charges and we await the Executive's consultation on this issue.

7. One of the key constraints in the delivery of the River Basin Management Plans (RBMP) will be the costs involved in implementing the measures outlined within the plans.
8. The Consumer Council has consistently recognised the need for increased investment and improvement in Northern Ireland's water and sewerage services. However, given the potential impact that these RBMPs will have on the water and sewerage industry and consumers as a whole our main concern is the costs associated with the implementation of the programme of measures.
9. While the Consumer Council understands that the costs and benefits of existing measures which are identified in the plans would have been assessed prior to their introduction we are disappointed that a draft impact assessment for the additional measures has not been published alongside the plans. We seek clarification if the overall cost of implementing the programme of measures will be made available for consultation prior to the final plans being published.
10. The Consumer Council has previously advocated in our response to the Minister for Regional Development's consultation on draft Environmental and Social Guidance that the issue of affordability should not be lost while pursuing environmental improvements. The essence of sustainability is to adopt a tri-partite approach which protects the environment, society and economic development. The challenge is getting the balance right between these three elements. Therefore it is important that all the proposals are subject to a cost benefit analysis to ensure that the costs do not outweigh the benefits that are due to be achieved. Further information on this analysis should be provided within the plans.
11. In the spirit of openness and transparency the delivery of the RBMPs needs to be effectively monitored and publicly reported on to help demonstrate value for money. Outcomes and results must be communicated to consumers in a timely manner. Transparency and

accountability in this manner will benefit water users and the general public.

12. The Consumer Council welcomes that consideration has been taken to extend deadlines were it proves that carrying out the improvements by 2015 may be disproportionately expensive. As there is the prospect of additional environment requirements in the future through tightening the scope of EU Directives the Consumer Council would also urge consideration of what future options are available for the managing of costs through mechanisms such as extended timescales, seeking temporary derogations and/or consideration of reasonable but not excessive costs, especially given the particular circumstances of the water sector in Northern Ireland and the backlog of investment.

13. What is evident from the plans is the integrated approach that is needed and planned for water management and the wide number of bodies and organisations involved in delivering the objectives. Water management is everyone's concern and to achieve the aims of the RBMPs commitment and cooperation is essential among the various government departments, agencies and organisations involved.

14. As the RBMPs develop further and the programme of measures are implemented continued engagement with stakeholders is vital. There needs to be clear communication channels in place to facilitate the flow of information and avoid duplication of work.

15. The Consumer Council's most recent water research¹ demonstrated that consumers want to be involved in decisions made about the future of their water and sewerage services. We welcome the approach that has been taken by the NIEA to encourage participation through the Northern Ireland WFD Stakeholder Forum, the Catchment Stakeholder Groups and public

¹ "Tapping into Consumer Views on Water: A Research Report by the Consumer Council commissioned by NI Water" March 2009

information days. It is important that this involvement is facilitated on an ongoing basis to create 'buy-in' and a sense of ownership of the RBMPs.

16. The benefits are two-fold, widespread information gathering can lead to ideas previously not considered being highlighted and the public can see how they have made an impact the RBMPs giving the process more credibility.
17. However, the draft RBMPs are lengthy and not conducive in aiding public participation further. The Consumer Council recognises the need for detailed RBMPs but NIEA should also consider a smaller summary version. The RBMPs documents need to be user-friendly, in an accessible format and easy to understand. If consumers are to be meaningfully involved it is vital that they understand the relevancy of how the RBMPs affect them, if this is established at the outset it could help in sustaining support and interest throughout implementation.
18. In order to assist creating a better understanding NIEA may wish to explain the links between how the high level objectives translate into local improvements throughout the RBMPs. Practical examples could be used to illustrate how actions may benefit specific water bodies.
19. One of the key elements of public engagement is the management of expectations. Being realistic about what can be done, within what timescale and the expected outcome creates a common direction for all those involved. Timescales of when the projects will be implemented and when benefits will be realised should be outlined in the RBMPs.
20. Public engagement should not stop once the final RBMPs are published in December 2009. Regular information on progress towards achievement of the objectives should be publicly available. This will illustrate how the RBMPs are making a difference to quality of the water environment.

21. In conclusion, the management of the water industry is a complex and varied issue. If the objectives set out are to be achieved a coordinated approach with clear communication channels is a necessity. Public engagement is a fundamental element in delivering the objectives and should continue after the publication of the final RBMPs. However, further information regarding costs is required to assess if the plans offer value for money.