

National Assembly for Wales
Environment and Sustainability Committee

Inquiry into water policy in Wales

August 2013



Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales

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Wales

Environment and Sustainability Committee

The Committee was established on 22 June 2011 with a remit to examine legislation and hold the Welsh Government to account by scrutinising expenditure, administration and policy matters encompassing: the maintenance, development and planning of Wales's natural environment and energy resources.

Current Committee membership



Dafydd Elis-Thomas (Chair)
Plaid Cymru
Dwyfor Meirionnydd



Mick Antoniw
Welsh Labour
Pontypridd



Russell George
Welsh Conservatives
Montgomeryshire



Llyr Huws Gruffydd
Plaid Cymru
North Wales



Julie James
Welsh Labour
Swansea West



Julie Morgan
Welsh Labour
Cardiff North



William Powell
Welsh Liberal Democrats
Mid and West Wales



Antoinette Sandbach
Welsh Conservatives
North Wales



Joyce Watson
Welsh Labour
Mid and West Wales



Vaughan Gething
Welsh Labour
Cardiff South and Penarth

The following Members were also members of the Committee during this inquiry:



Keith Davies
Welsh Labour
Llanelli



David Rees
Welsh Labour
Aberavon

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Introduction

1. The Environment and Sustainability Committee undertook an inquiry into water policy in Wales, with specific reference to the implications for Wales of the Draft UK Water Bill and Welsh Government initiatives aimed at addressing water affordability issues.
2. There were two distinct strands to the inquiry; competition (in the non-household market), and affordability (for households). The terms of reference were:
 - to assess the implications of the Draft Water Bill for Wales, particularly with regard to competition in the non-household market; and
 - to assess progress made by the Welsh Government in addressing water affordability issues for households.
3. Three main water companies currently supply water and sewerage services to customers in Wales – Dŵr Cymru, Severn Trent Water and Dee Valley Water.

Water competition

Cave Review (2009)

4. The Cave Review, led by Professor Martin Cave, was jointly commissioned by the UK and Welsh Governments in 2008 to review competition and innovation in water markets in Wales and England. The final report, in 2009, made the following main conclusions relating to competition:
 - The Environment Agency should be given new powers to tackle over-abstraction and to encourage the trading of licences;
 - There would be benefits from introducing competition into the upstream (wholesale) market;
 - There may be benefits in allowing retail competition in the non-household market. This should be accompanied by the legal separation of the retail arm from the rest of water companies' business; and
 - The special merger regime should be reformed and restricted to mergers which are likely to impact on Ofwat's ability to undertake comparative competition.

5. The report concluded that the industry could save £2.5 billion, in today's prices, over 30 years, due to efficiency gains. There would also be improved environmental outcomes and higher service quality levels.¹

UK Draft Water Bill

6. The UK Government published a Draft Water Bill on 10 July 2012.² The Draft Bill contains measures that will give businesses and other non-household customers in England greater choice by allowing them to switch their water and sewerage suppliers and to remove some of the existing regulatory requirements that are considered barriers to entrants wishing to enter the market.

7. The Draft Water Bill could have implications for Wales in that the provisions of the Draft Water Bill could be extended to Wales if the Welsh Government so wishes.

8. There is currently limited scope for non-household customers in Wales to switch water suppliers.³ Non-household customers in Wales who use, or are likely to use, at least 50 megalitres of water a year at each premises are able to choose their water supplier from new companies entering the market. The equivalent threshold in England is considerably lower at 5 megalitres.⁴

Water affordability

9. Water affordability is an issue affecting many thousands of people in Wales. Dŵr Cymru told the Committee that they estimate that 14% of households in its area, between 150,000 and 160,000, spend more than 5% of their household income on water bills.⁵ The Welsh Government, through its Programme for Government, is committed to taking action on water affordability in Wales. The Programme for Government Update (May 2012) stated that the Welsh Government would be:

- developing proposals on a fair system of charging, based upon the recommendations of the Walker Review;

¹ Defra, The Environment, Quality and Safety, Water, Water Industry, [Cave Review](#) [accessed 6 March 2013]

² Defra, Environment, Water, air, other environment quality issues, Water, Overall water legislation/policies, [Draft Water Bill](#) [accessed 5 March 2013]

³ Welsh Government, Topics, Environment and Countryside, Environment – protection and quality, Water, [Water industry regulation](#) [accessed 5 March 2013]

⁴ Ofwat, Non-household consumers, Choosing your supplier, [Choosing a water supply licensee](#) [accessed 5 March 2013]

⁵ National Assembly for Wales, Environment and Sustainability Committee, RoP p18, 21 March 2013

- issuing new Social Tariff Guidance;
- consulting on Bad Debt Regulations;
- consulting on a Water Strategy for Wales.

Walker Review (2009)

10. The Walker Review was jointly commissioned by the UK and Welsh Governments in 2008 to review charging and metering for water and sewerage services in Wales and England. The review was led by Anna Walker, who was then Chief Executive of the Healthcare Commission.⁶

11. The review recommended actions that could be taken to ensure that a sustainable and fair system of charging is in place, including changes to current legislation and guidance.

Social Tariff Guidance

12. On 1 March 2013 the Welsh Government published guidance to enable water companies to develop social tariffs to support people who have most difficulty in paying their bills.⁷

13. The guidance sets the framework for water companies to develop a social tariff if they choose to do so. It includes what should be considered when deciding if one group of customers should subsidise another, and explains what Ofwat should consider when approving charging schemes.

14. The Committee heard oral evidence from stakeholders, including water companies, Ofwat, Consumer Council for Water and the Minister for Natural Resources and Food to assess the implications of these policies for Wales.

⁶ Defra, Publications, Environment, [The independent review of charging for household water and sewerage services \(Walker review\)](#) [accessed 14 March 2013]

⁷ Welsh Government, Topics, Environment and Countryside, Environment - Protection and Quality, Water, [Social tariff guidance](#) [accessed 14 March 2013]

1. Competition in the non-household market

15. The Draft Water Bill proposed by the UK Government would allow non-household customers in England to change their water and sewerage suppliers. The provisions in the Bill could also be extended to Wales should the Welsh Government decide to follow this approach. Currently in Wales, large users of water – those who use or are likely to use over 50 mega litres of water per year, are able to change their providers by opting to receive their water from new companies entering the market. The provisions in the Draft Bill would extend this choice further by allowing customers to change to an incumbent water supplier.

16. The Committee heard a range of opinions from stakeholders as to whether they believed that the introduction of competition to non-household customers would be beneficial to Wales.

17. As part of our evidence gathering, we sought the views of heavy users of water as to whether they would consider changing their water supplier under the arrangements proposed in the Draft Water Bill. Generally, the businesses we approached said that they would consider changing their suppliers should it result in a fairly substantial saving to them, those who would be in favour of changing said that they would need to see a reduction of between 10-15% to persuade them to do so. Customer service was also an important issue to these businesses we spoke to, they told us that they would not expect any reduction in the cost of their water supply to be to the detriment of the service provided by their supplier.

Dŵr Cymru

18. Dŵr Cymru provides water and sewerage services to most of the non-household and domestic customers in Wales, serving 1.3 million households and over 100,000 businesses in Wales, and adjoining areas of Herefordshire and Deeside. Dŵr Cymru is owned by Glas Cymru (a company limited by guarantee) and is operated as a “not-for-profit, customer-owned model”.⁸ In his oral evidence to the Committee, Nigel Annett, Managing Director of Dŵr Cymru praised his company’s performance in achieving high standards and making savings over recent years. He said:

⁸ National Assembly for Wales, Environment and Sustainability Committee, RoP p11, 21 March 2013

“in Dŵr Cymru, we have customer satisfaction levels, as you have seen, of well over 90%” and “The water quality that we deliver day in, day out is now well over 99.9%, which is as good as it can be.”⁹

Dŵr Cymru position

19. In their written and oral evidence to the Committee, Dŵr Cymru did not agree that the introduction of competition in the water industry would be beneficial to its customers. Nigel Annett told us that he believed that setting up the systems required to allow people to switch between suppliers would be expensive. He said that setting up such systems in Scotland had cost £22 million and that the estimated cost for England and Wales was £40 million. He added that the experience of other industries, such as energy, had seen early estimates of costs double or even triple.¹⁰

20. Mr Annett also raised concerns that allowing non-household customers to change suppliers could result in increased costs for domestic customers. He explained that as margins were tight, lowering the charge to non-household customers in order to attract them to change suppliers, could result in the cost difference being passed on to households.¹¹

21. Mike Davis, Planning and Regulation Director for Dŵr Cymru, told the Committee that there was already provision in place to allow the very largest of water users to change their suppliers, but that none of the 113 eligible customers it supplied had chosen to do so.¹²

22. Nigel Annett told us that should the Welsh and UK Governments adopt differing approaches to water policy in the future, it would result in Dŵr Cymru operating under two differing regimes – one in Wales where the majority of its customers are located, and another in those areas of Herefordshire where it also supplies. Mr Annett told the Committee that he believed that Dŵr Cymru would be able to operate under such circumstances should it be necessary.¹³

⁹ National Assembly for Wales, Environment and Sustainability Committee, RoP, p12, 21 March 2013

¹⁰ National Assembly for Wales, Environment and Sustainability Committee, RoP, p73, 21 March 2013

¹¹ National Assembly for Wales, Environment and Sustainability Committee, RoP, p73, 21 March 2013

¹² National Assembly for Wales, Environment and Sustainability Committee, RoP, p96, 21 March 2013

¹³ National Assembly for Wales, Environment and Sustainability Committee, RoP, p87, 21 March 2013

Severn Trent Water

23. Severn Trent Water provides water and sewage services to a large part of mid Wales and, as a company operating mainly in England, is regulated by legislation and policy in England. Severn Trent Water is part of Severn Trent Plc, a FTSE 100 company that provides water related services throughout the UK and internationally.¹⁴ In their written evidence to the Committee, Severn Trent Water said that it was committed to providing excellent value for money for its customers and that its average combined water and sewerage bills were around £100 less than elsewhere in Wales.¹⁵

Severn Trent Water position

24. In their written evidence, Severn Trent Water stated that “appropriate competition should be introduced to encourage innovation and sustainability”.¹⁶ Andrew Fairburn, Head of Government Relations at Severn Trent Water, expanded on this during oral evidence, he said:

“For water companies, I think that we need to be innovative. It is in that context that we support, as a general principle, the introduction of some competition into the water industry, because we think that it will reduce customers’ bills. However, we think that probably the biggest advantage that it will bring is that it will drive environmental innovation and sustainability and innovation in how we serve customers. We think it will help spur that..... In some areas of what we as water companies do, it is appropriate that we have competition to keep us on our toes, to hold us to account, and to drive us to new ways of doing things.”¹⁷

25. Mr Fairburn went on to say that although the number of customers who had changed suppliers under current arrangements was low, he believed that removing the threshold for non-domestic competition would stimulate the market.¹⁸

26. The Welsh Government’s submission to the Silk Commission on Devolution proposed that the Assembly’s legislative competence in relation

¹⁴ National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 2 – Severn Trent Water*

¹⁵ Ibid

¹⁶ Ibid

¹⁷ National Assembly for Wales, Environment and Sustainability Committee, RoP p107, 21 March 2013

¹⁸ National Assembly for Wales, Environment and Sustainability Committee, RoP p127, 21 March 2013

to water should extend up to the geographic border with England.¹⁹ Should this happen, Severn Trent's customers in mid Wales would come under the responsibility of the Assembly and no longer be regulated under the English system.

27. In response to the proposition of operating under two different regulatory regimes in England and Wales, Mr Fairburn said that he believed that it would increase costs. He told the Committee:

“purely from the operational perspective of the water industry, as a company that operates across the border, a single regulatory regime is obviously cheaper and easier and hence our customers' bills, particularly in Wales, are lower.”²⁰

Consumer Council for Water

28. The Consumer Council for Water (CC Water) is the independent, non-departmental public body representing the interests of water and sewerage consumers across England and Wales.

CC Water position

29. In their written evidence, CC Water listed the issues it saw as either advantages or disadvantages of not introducing competition for non-household customers in Wales. They believed that having different systems in England and Wales could cause confusion with those in England being able to change whereas in Wales, only those using 50ml would be eligible. They also believed that businesses operating on multiple sites in both countries would not see the full benefits available to those operating in England only. On the plus side, CC Water acknowledged that customers in Wales could be protected from the potential risks of extending competition, such as mis-selling, misinformation and possible deterioration in the quality of services.²¹

30. The written evidence from CC Water also referred to research it had carried out which showed that:

- 84% of larger business customers and 69% of SMEs support competition in principle, with price being the key reason for switching supplier;

¹⁹ Welsh Government, About, Organisation Explained, [Devolution](#) [accessed 9 April 2013]

²⁰ National Assembly for Wales, Environment and Sustainability Committee, RoP p167, 21 March 2013

²¹ National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 4 – Consumer Council for Water*

- 81% of large business customer would expect a 10% saving on their bill upon switching while 51% SMEs would switch supplier if they could save over 10%;
- SMEs based in Wales have a more positive view of water and sewerage companies than businesses based in England, both with regards to satisfaction with services and value for money;
- Most SMEs would like to see consistent rules on competition eligibility across the two countries, particularly by those who had premises located in both countries;
- A significant proportion of SMEs in Wales think competition in the water industry is a very good thing (64% compared to 30% in England) and are interested in changing supplier (46% compared to 32% in England).²²

31. Tony Smith, Chief Executive of CC Water and Diane McCrea, Chair of the CC Water Wales Committee expanded on these points during their oral evidence session. Mr Smith told the Committee:

“The general point here, I think, is that business customers generally want choice. They compare water somewhat unfavourably with other things they buy, such as energy, because they do not have a choice.”²³

32. Despite this, they also stressed that showing an interest in changing would not necessarily result in all of those customers actually changing their suppliers. Ms McCrea told the Committee:

“There is a slight difference between being interested in the idea of competition and being willing to switch. Customers would be willing to switch if they could see a considerable price reduction. As to whether it would deliver a 10% price reduction for them, the reality of that needs to be tested. We do not know at this stage. There is no evidence that there would be that level of switching.”²⁴

33. Tony Smith summed up both the benefits and negatives to customers of introducing competition into the non-household water market. He said that competition could put pressure on existing companies to improve their service and provide additional help in saving water, but on the other hand

²² National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 4 – Consumer Council for Water*

²³ National Assembly for Wales, Environment and Sustainability Committee, RoP p223, 21 March 2013

²⁴ National Assembly for Wales, Environment and Sustainability Committee, RoP p224, 21 March 2013

customers could be left disappointed if the level of reduction in their bills did not meet their expectations.²⁵

Dee Valley Water

34. Dee Valley Water is a water supply only company based in Wrexham. They are responsible for supplying water to around 257,000 customers in England and Wales, mainly centred around Wrexham, Llangollen and Chester. The majority of its customers, around 60% are in Wales.

Dee Valley Water position

35. The written evidence from Dee Valley Water referred to a proposal in Ofwat's price setting consultation to introduce a service incentive for water companies wholly or mainly in Wales to promote service improvements in Wales in line with those expected to be delivered by the non-household retail market in England. They therefore believe that it's "likely that non-household customers in Wales will continue to see improvements in levels of service and price even though they will not need to switch suppliers in order to obtain the benefits."²⁶

36. Their written evidence went on to say that "The introduction of competition in the non-household sector will present the real possibility of household customers subsidising the non-household sector unless transparent protection is put in place early in the process."

37. Dee Valley Water also said it had concerns regarding the introduction of different regimes in England and Wales is. It said that it would be subject to providing and delivering different policies for its customers depending on which side of the border they are and believed that this could result in confusion for non-household customers.²⁷

Ofwat

38. Ofwat is the economic regulator of the water and sewerage sectors in England and Wales.

²⁵ National Assembly for Wales, Environment and Sustainability Committee, RoP p226 – 228, 21 March 2013

²⁶ National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 1 – Dee Valley Water*

²⁷ Ibid

Ofwat position

39. In its written evidence to the Committee, Ofwat stated that it's supportive of the UK Government's proposals to introduce choice for non-household customers and greater upstream trading of water. It referred to "a wealth of both theoretical and empirical evidence suggesting that market-based approaches are more effective than regulation at driving efficiency".²⁸ Ofwat also said that if the changes proposed in the Draft Water Bill were introduced in Wales, it believed that they would deliver a range of positive benefits for Welsh customers. It referred to the experience in Scotland, where choice over the retail supplier for non-household customers had already been introduced, saying that it had brought reduced bills and water use through greater water efficiency.²⁹

40. In their written evidence, Ofwat said that it had calculated that the potential benefit to Wales of extending choice of supplier to business customers was in the order of £18 million over 3 years.³⁰

41. In response to the suggestion that water companies may increase the costs for household customers in order to balance the discounts offered to non-household customers, Keith Mason, Senior Director of Finance and Networks for Ofwat said, that it would be something that Ofwat would have to monitor very strongly.

Welsh Government's position

42. The Welsh Government does not share the UK Government's views on the potential benefits of competition.

43. In its Strategic Policy Position Statement on Water³¹ (December 2011), the Welsh Government stated that it 'remains to be convinced' of the benefits of competition, and that:

"Based on the available evidence, the Welsh Government does not believe that the case has been made to support either the separation

²⁸ National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 7 - Ofwat*

²⁹ Ibid

³⁰ Ibid

³¹ Welsh Government, Topics, Environment and Countryside, Environment - Protection and Quality, Water, [Strategic Policy Position Statement on Water 2011](#), [accessed 18 April 2013]

of the retail and network businesses in the water sector or the benefits of further competition for domestic customers.”³²

44. In the written evidence provided by the Minister for Natural Resources and Food, the Welsh Government’s position remained unchanged:

“Officials have reviewed a number of reports and have met with Ofwat and Defra on various occasions to discuss how retail and upstream competition in the water industry could benefit Wales. However, to date, we have not received any clear modelling or evidence to demonstrate the benefits of taking these policies forward in Wales at this time.”

45. However, the paper also said that the Welsh Government was undertaking work in the area of market reform:

“Officials are currently in the process of commissioning a study which will look at the current water industry regulatory and legislative framework in Wales (baseline). This will enable the Welsh Government to understand whether the current regulatory regime in Wales is fit for purpose. We will also be exploring options to test against the baseline that will ensure customers in Wales receive the best service and we continue to encourage our water companies to embrace the demands from efficiency. These options would include as a minimum enhanced regulation and incentivisation and market solutions.

“We will also be taking an opportunity to assess what service requirements and expectations business customers have in relation to the water industry in Wales.”³³

46. In oral evidence to the Committee, Alun Davies AM, Minister for Natural Resources and Food stated that the Welsh Government did “not want to follow the direction outlined by the Westminster Government of being overly dependent on competition within the water supply system”.³⁴ The Minister went on to say that he did not understand how Ofwat had calculated the

³² Welsh Government, Topics, Environment and Countryside, Environment - Protection and Quality, Water, [Strategic Policy Position Statement on Water 2011](#), [accessed 18 April 2013]

³³ National Assembly for Wales, Environment and Sustainability Committee, *E&S(4)-13-13 paper 1*, 1 May 2013

³⁴ National Assembly for Wales, Environment and Sustainability Committee, RoP p5, 1 May 2013

£18million of potential savings it said could be achieved by introducing competition, he said:

“In terms of the figure of £18 million that Ofwat has published; you are absolutely right. We do not understand where that figure has come from and we have not seen any calculations as to how that figure was reached.”³⁵

47. The Minister went on to dismiss the claims made by Severn Trent Water and Ofwat that operating 2 different regulatory regimes in England and Wales would be more expensive for Welsh customers, the Minister said:

“I do not accept that statement. I have not seen any evidence to sustain it— ...I do not know and nobody in this room, in Ofwat, in Severn Trent Water or in Welsh Water knows what the nature of any differing regulatory regimes may be, because they have not been designed or legislated for at present. So, trying to sum up the costs of something that we do not understand is not possible. I do not accept that analysis.... I will not accept arguments from regulators that we cannot design a different policy in Wales because it is inconvenient for them.”³⁶

48. The Minister and his officials acknowledged that some business may generally support the principle of introducing competition initially, but believed that the business model operated by Dŵr Cymru offered more benefits, which customers were appreciative of once they understood. Prys Davies, Deputy Director, Energy, Water and Flood Division, said:

“The initial question was: are people supportive of more competition? Yes, people are supportive of the principle, but if you look down into the detail of the study, you find that once people have understood the model, particularly the Glas Cymru model that currently operates in Wales, and they have seen the potential savings that they might make—the potential savings from introducing competition in the retail area are quite small—their initial view of competition being a very positive thing is significantly tempered.”³⁷

³⁵ National Assembly for Wales, Environment and Sustainability Committee, RoP p7, 1 May 2013

³⁶ National Assembly for Wales, Environment and Sustainability Committee, RoP p19&21, 1 May 2013

³⁷ National Assembly for Wales, Environment and Sustainability Committee, RoP p34, 1 May 2013

49. In response to the issue raised by Dŵr Cymru that offering discounts to non-domestic customers could result in increased costs for domestic customers, the Minister said that he shared those concerns, he said:

“we are talking to the regulator and the UK Government to ensure that Welsh domestic customers are protected from, effectively, subsidising competition in the non-domestic market. We have some concerns about the situation in the Severn Trent area, which we have discussed with the United Kingdom Government.”³⁸

50. Prys Davies added:

“It is a concern that we share with regard to the way in which the non-domestic market reforms might work. Their impact on domestic customers, particularly in Wales, needs to be considered and looked at in more detail.”³⁹

The Committee’s view

51. We note the estimated costs involved with establishing the systems required to introduce competition into the non-household market and the potential for such costs to increase. We also note the figures quoted by Ofwat for savings to customers through the introduction of such competition. Given the potential for the establishing costs to increase and the uncertainty regarding the actual savings that could be accrued by customers, we remain unconvinced of the financial benefits of introducing competition into the system. We believe that the ‘not for profit’ business model operated by Dŵr Cymru is successful and is run in the best interests of the people it serves, therefore we do not believe that the concept of introducing competition into the water market would be a positive step for the people of Wales.

52. We also heard concerns regarding the potential for the financial burden of offering discounts to non-household customers to be transferred to domestic customers. The possibility of such an increase for domestic customers is of grave concern to us, given the large numbers of households in Wales who already live with water poverty.

³⁸ National Assembly for Wales, Environment and Sustainability Committee, RoP p47, 1 May 2013

³⁹ National Assembly for Wales, Environment and Sustainability Committee, RoP p48, 1 May 2013

53. We were told of the Draft Water Bill's potential to drive water efficiencies and achieve environmental improvements, although we did not hear strong evidence to demonstrate how this would be achieved. We heard from Dŵr Cymru that it constantly achieves 99.9% water quality levels and environmental measure under the existing circumstances, and that its leakage levels are managed, therefore we are not convinced by the argument that competition would deliver greater improvements.

54. We realise that many businesses are supportive of the principle of being able to change their water supplier if they so wished, however we were told that they would expect to see a substantial saving to persuade them to actually change. It is not clear how much of a saving a business could expect to achieve, therefore we would be concerned that the efforts made to enable them to change suppliers would not match the desired outcome.

55. We heard evidence that customers in Wales were generally content with the service offered to them by their water suppliers. As a Committee, we would be very concerned if, in the drive to reduce the costs it could offer to new customers, less emphasis was to be put into the level of customer services a company offered to its existing customers.

56. We heard many arguments both in favour and against extending the provisions in the Draft Water Bill to introduce competition for non-domestic customers in Wales. After weighing up all of the evidence, we remain unconvinced that introducing such reforms in Wales would result in reducing costs to customers, achieving further efficiency savings, improving environmental standards and maintaining high levels of customer services. We note that the Welsh Government does not currently intend to introduce competition into the water industry in Wales, and we would recommend that such a cautious approach is maintained until stronger evidence becomes available to demonstrate the benefits of competition to Welsh customers.

2. Water affordability

57. Being able to afford the water they use is an issue which affects thousands of people in Wales. 'Water poverty' is often used to refer to households whose water costs equate to between 3-5% of their incomes. Nigel Annett, Managing Director of Dŵr Cymru, told the Committee that an estimated 14% of households in the Dŵr Cymru area, between 150,000 and 160,000, spend more than 5% of their household income on water and sewage bills.⁴⁰

58. Through its Programme for Government (May 2012), the Welsh Government committed to taking the following action on water affordability:

- developing proposals on a fair system of charging, based upon the recommendations of the Walker Review;
- issuing new Social Tariff Guidance (published on 1 March 2013);⁴¹
- consulting on Bad Debt Regulations; and
- publishing a Water Strategy for Wales for consultation in the Autumn of 2012.⁴²

Walker Review (2009)

59. The Walker Review was jointly commissioned by the UK and Welsh Governments in 2008 to review charging and metering for water and sewerage services in Wales and England. The review was led by Anna Walker, who was then Chief Executive of the Healthcare Commission.⁴³

60. The review recommended actions that could be taken to ensure that a sustainable and fair system of charging is in place, including changes to current legislation and guidance. The final report, in 2009, drew the following main conclusions:

⁴⁰ National Assembly for Wales, Environment and Sustainability Committee, RoP p18, 21 March 2013

⁴¹ Welsh Government, Topics, Environment and Countryside, Environment - Protection and Quality, Water, [Social tariff guidance](#) [accessed 14 March 2013]

⁴² Welsh Government, About, Programme for Government, Environment & Sustainability, [Progress report](#), p35-36 [accessed 14 March 2013]

⁴³ Defra, Publications, Environment, [The independent review of charging for household water and sewerage services \(Walker review\)](#) [accessed 14 March 2013]

- The charging system needs to incentivise the efficient use of water so as to ensure there are sustainable supplies for the future. Water also needs to be affordable for all, particularly those on low income.
- The current charging regime for these services is under pressure. For unmetered customers (65 per cent of customers), there is no incentive to use water efficiently. Customers opt for meters when they think they can personally benefit from doing so. This means that the cross-subsidy in the current rateable value system is unwinding, so that those who remain unmetered (often those on low income) already have higher bills and will see their bills rise further even if average bills do not change.
- Charging by volume of water used (which involves metering) is the most effective way of incentivising the efficient use of water. But meters incur additional costs. The transition to metering needs to be led to ensure that total costs are kept down. The report recommends that Ofwat should provide this leadership, within an overall policy framework from government. It also recommends that there should be an agreed methodology for looking at the costs and benefits of metering; and that metering will generally be cost-effective where water is scarce or there are capacity constraints. There should also be systematic metering of properties on change of occupier and of customers with high discretionary consumption – who use more water than most, but under the rateable value system pay no more for that additional use.
- The support to low-income families through the rateable value charging system is very poorly targeted, as rateable value is out-dated. It is also unwinding as more customers opt for a metered supply. Some replacement is needed and the report makes recommendations for a package of help which includes the retention of Watersure (a scheme that caps bills) and discounts for metered customers on low incomes. According to the review this will be important if the transition to metering is not to cause problems of affordability to those on low incomes.⁴⁴

61. The Welsh Government consulted on the recommendations of the Walker Review in 2011, specifically focusing on options for providing better support for vulnerable and low income households, encouraging greater

⁴⁴ Defra, Publications, Environment, [The independent review of charging for household water and sewerage services \(Walker review\)](#) [accessed 14 March 2013]

water efficiency and possible future options for metering.⁴⁵ The consultation responses are feeding into development of the Welsh Government's new Water Strategy for Wales, which is due for consultation later in 2013.

Water meters

62. Water meters are the most accurate way of measuring how much water a household uses and allow water companies to charge those households for the exact volume of water they use rather than using the traditional method of charging households based on the rateable value of their properties. Nigel Annett told the Committee that approximately a third of Dŵr Cymru customers were metered,⁴⁶ with Andrew Fairburn quoting the same percentage figure for Severn Trent Water⁴⁷. The representatives from the water companies explained that customers could request a water meter for a trial period of up to 1 year, during which time the meter could be removed, however after that period, the meter would remain. Customers with existing meters in their properties were unable to request their removal. We heard arguments both for and against extending the use of water meters to more households across Wales.

Impact on water bills

63. For many the concept of having a water meter and therefore being charged for the exact volume of water used would be a positive step, especially for households with fewer inhabitants who would be likely to use less water. For larger households however, having a water meter could mean increases in their water costs.

64. The evidence we heard from both Dŵr Cymru and Severn Trent water was clear, both companies agreed that extending the use of water meters was not the solution to water issues in Wales. Nigel Annett told us that Dŵr Cymru were not "enthusiastic about extending metering. We give people a choice, but we do not promote metering...putting everyone on meters, particularly when we are worried about bills, is not the right answer."⁴⁸

⁴⁵ Welsh Government, Consultation, [Consultation on the Walker Review of charging for household water and sewerage services](#) [accessed 14 March 2013]

⁴⁶ National Assembly for Wales, Environment and Sustainability Committee, RoP p33, 21 March 2013

⁴⁷ National Assembly for Wales, Environment and Sustainability Committee, RoP p149, 21 March 2013

⁴⁸ National Assembly for Wales, Environment and Sustainability Committee, RoP p34, 21 March 2013

65. Mr Annett explained that water meters were not always the cheapest option for customers. He said:

“it is important for us all to remind people that it is not a cost-free option. Meters are a very expensive way to collect the water bill. They add about £50 to £70 to the bill, just for the meter itself, whereas collecting water bills on the basis of an unmeasured charge is very cheap.”⁴⁹

66. Mike Davis, Planning and Regulation Director for Dŵr Cymru, explained further the additional costs customers on water meters would incur. He said:

“There is the cost of actually installing the meter, and that is around £250. However, that is obviously not charged to the customer at the time. It is recovered over the life of the meter, which is around 12 years. The other element of the ongoing cost is actually reading the meters and then processing those meter readings and actually producing the bills from them. That is the additional ongoing cost of metering as well as the capital costs”⁵⁰

67. Mr Davis acknowledged that low users of water could benefit from being on a water meter, however when comparing the costs accrued by households with similar usage, those on a meter would pay more than those who are not, he said:

“In terms of the charges that we make to customers, if the unmeasured customer and the metered customer are using the same amounts of water, the metered customer will be charged between £55 and £70 more than the unmeasured customer. That is set in tariffs that have been approved by the regulator.”⁵¹

68. Crucially, Mr Davis concluded by saying:

“If metering is going to become an area of public policy, an awful lot of data need to be collected to understand the impact.”⁵²

⁴⁹ National Assembly for Wales, Environment and Sustainability Committee, RoP p33, 21 March 2013

⁵⁰ National Assembly for Wales, Environment and Sustainability Committee, RoP p51, 21 March 2013

⁵¹ National Assembly for Wales, Environment and Sustainability Committee, RoP p54, 21 March 2013

⁵² National Assembly for Wales, Environment and Sustainability Committee, RoP p58, 21 March 2013

69. The representatives from Dŵr Cymru and Severn Trent Water agreed that the geography of Wales meant that it was not particularly suitable for water meters. Nigel Annett told us that whereas it was relatively cheap to supply urban areas, it was expensive to supply rural areas. Andrew Fairburn, Head of Government Relations for Severn Trent Water agreed, he said:

“What are you trying to do? If it is to reduce prices, I am not convinced that it is the best way forward, certainly not in our area, given our geography and environmental conditions.”⁵³

70. Diane McCrea, Chair of the Consumer Council for Water (CC Water) Wales Committee, was clear that being on a water meter would benefit some customers and disadvantage others. She said that CC Water advise customers to trial a water meter to see whether or not their costs reduce, and if they do not, to revert back within the year’s trial period. Tony Smith, Chief Executive of CC Water, told us that giving customers a choice as to whether they would prefer a water meter was a good thing, however compulsory metering was a different issue. He agreed with other witnesses that larger households would see an increase in their water bills should they change to a water meter. He said:

“The research that we have done of customers suggests that customers want a choice in this matter. When you move toward compulsory metering, it is a different matter, and a large percentage of customers, probably about a third of customers, would be strongly opposed to it. It is likely to have a big impact in particular on those customers who are in low rateable value, large households. Whereas some customers can benefit, customers in those circumstances—low rateable value, large households—could have a price increase overnight of £200.”⁵⁴

Impact on water reduction

71. In addition to the potential of lowering costs for some customers, some believe that the other advantage of extending water meters is to reduce water usage – the notion is that those on meters will use less water in order to reduce their costs, which would have a cumulative effect of water usage. The evidence we heard on this issue was that in reality, the situation was not so clear cut.

⁵³ National Assembly for Wales, Environment and Sustainability Committee, RoP p149, 21 March 2013

⁵⁴ National Assembly for Wales, Environment and Sustainability Committee, RoP p235, 21 March 2013

72. Nigel Annett told the Committee that whilst a meter might have a short term impact on a household's water consumption, the effect would not always be sustained. He said:

“when meters are installed, there is a short-term impact on water demand, but because water use is non-discretionary, the impact of metering over three, four or five years will fall away. Water costs about £1.50 per tonne to supply. It is very cheap and inexpensive, and when people realise that—those who can afford to pay their water bill in the first place—they have a limited incentive to reduce their consumption to affect their bill.”⁵⁵

73. Mr Annett later referred to the trialling of water meters carried out on the Isle of Wight during the 1990s, and that despite an initial reduction in water usage, consumption increased in subsequent years, he said:

“On the Isle of Wight experiment, which goes back 15 years, in the first instance, demand for water fell by between 6% and 8%, so that was the first impact. However, over the subsequent years, it trended back up to the old levels of usage.”⁵⁶

74. The evidence we received from Severn Trent Water concurred that extending the use of water meters would not necessarily reduce water consumption. Andrew Fairburn, told us:

“If it is to reduce consumption, it comes back to this point: we have one of the lowest, if not the lowest, uptake of meters, which is about a third, yet we have the lowest per capita consumption..... as a general principle, if metering is to reduce consumption, we have not seen the evidence on that.”⁵⁷

75. Mr Fairburn went on to add that he believed there were more effective ways of reducing water consumption rather than installing water meters. He said:

“Meters cost money. I would suspect that, in some places, they might be appropriate, but most of the time there is a more efficient way of helping customers to reduce their own consumption: fitting water

⁵⁵National Assembly for Wales, Environment and Sustainability Committee, RoP p38, 21 March 2013

⁵⁶ National Assembly for Wales, Environment and Sustainability Committee, RoP p59, 21 March 2013

⁵⁷ National Assembly for Wales, Environment and Sustainability Committee, RoP p149 – 150, 21 March 2013

efficient taps and shower heads and changing the flushes on toilets can all make a very significant, easy difference, which can make the cost a lot cheaper.”⁵⁸

76. The evidence we heard from Keith Mason, Senior Director of Finance and Networks, for Ofwat, disagreed slightly with what the water companies told us. Whilst acknowledging that water meters could mean higher charges for some customers, he thought that their benefits were greater. Mr Mason told us that water meters were the most effective way of measuring consumption and that being able to quantify consumption was beneficial to water companies and customers, he told us:

“measuring consumption and knowing how much you use enables people to make decisions, and both domestic customers and the company have greater knowledge of consumption, because at the moment they rely quite a lot on estimates. So, if someone is unmetered, they have to estimate how much water their unmeasured stock is using. If you do not know exactly how much you are using, it is much more difficult to take decisions about where you need to take water from and how you might use it. So, it has to be a combination of things, but metering is the best option overall. However, I agree that there are costs associated with that.... I still believe that metering is the best way of measuring consumption. It is a very effective way of driving efficiency, but it has to be balanced against cost and affordability.”⁵⁹

Welsh Government position

77. In his written evidence to the Committee, the Minister for Natural Resources and Food said that the Welsh Government had conducted a consultation in 2011 on the implications of metering scenarios in Wales, which responses to were generally supportive of metering because it promotes fairness and efficiency.⁶⁰ In his oral evidence, the Minister told us that a greater understanding of the impact of water meters on customers’ bills was needed, so that poorer people were not penalised, he said:

⁵⁸ National Assembly for Wales, Environment and Sustainability Committee, RoP p164, 21 March 2013

⁵⁹National Assembly for Wales, Environment and Sustainability Committee, RoP p251 – 253, 17 April 2013

⁶⁰National Assembly for Wales, Environment and Sustainability Committee, *E&S(4)-13-13 paper 1*, 1 May 2013

“we do not want to do is to introduce that system and see a negative impact on some of the poorest people in the country. So, we need to understand, first of all, what that impact will be, and then, if we do wish to move to a metering system, how we introduce a social tariff to ensure that people are not penalised because of that, and then how we would introduce such a system in terms of the cost of delivering that infrastructure and investment, which Welsh Water has calculated and has been able to describe in some detail. I accept Welsh Water’s analysis on that. So, at the moment, it is something that we are still considering and trying to understand in more detail.”⁶¹

78. The Minister concluded by saying that he was committed to ensuring a water payment system which was fair for all types households, he said:

“My concern as a Minister is to ensure that we have a system of payment for water that is transparent and fair for everyone—the single pensioner household, as well as the large family. It should also be fair in terms of people’s economic situation. Therefore, that is the approach that we will take, and those are the principles that will underpin that approach.”⁶²

The Committee’s view

79. The Committee received clear evidence that extending the use of water meters to all households was not a suitable policy to implement in Wales. We accept that the concept of metering is fair in principle, by charging customers for the water they use, however we were told that many people in Wales would be financially worse off if they had a meter, and so we would be very concerned at the impact increased charges could have on households who already struggling to pay their water bills.

80. We also note that some households, those with fewer inhabitants, could benefit from having a water meter installed, and so we welcome them having the option of trialling a meter for a year.

81. We did not hear any clear evidence that water meters would reduce water consumption in Wales for a sustained period of time. We realise that in some areas with very high population levels where water can be in short

⁶¹ National Assembly for Wales, Environment and Sustainability Committee, RoP p45, 1 May 2013

⁶² National Assembly for Wales, Environment and Sustainability Committee, RoP p90, 1 May 2013

supply, metering can be a useful tool to address consumption, however in Wales, we are lucky that we have sufficient water resources and are therefore not in a position to have to consider compulsory metering for that reason. That does not mean that we can be complacent about our water supplies, we welcome the initiatives mentioned to us by both Dŵr Cymru and Severn Trent Water to educate people on the importance of water preservation and believe that such work should be expanded by water companies and the Welsh Government.

82. The Committee welcomes the commitment made by the Minister for Natural Resources and Food to get a better understanding of the impact of extending water meters before making any decisions as to whether they are rolled out in Wales. We would urge the Welsh Government to consider the impact this could have on poorer families, and should it adopt a policy of extending water meters in the future, we believe that it should be accompanied by appropriate tariffs to ensure that customers are not penalised.

Assistance for poorer customers

83. With water poverty a real issue for thousands of people in Wales, the water companies told us how they have their own initiatives to assist those in need. Nigel Annett told us that Dŵr Cymru offers support to 50,000 households through a number of assistance tariffs. He explained that the average Dŵr Cymru bill was £400, and that the Welsh Water Assist tariff available to customers on low incomes and in receipt of certain benefits, was just over half of that at £220.⁶³ Mr Annett added that Dŵr Cymru had set up a special team at its call centre in Cardiff to assist customers in applying for the special tariffs.

84. Andrew Fairburn described the work Severn Trent Water had been doing in partnership with the Citizens Advice Bureaux (CAB), whereby they award a grant to the CAB and then refer customers who need assistance to the CAB for wider financial advice. He believed that offering such advice had longer term financial benefits for customers compared to a reduction to their water bills.⁶⁴

⁶³ National Assembly for Wales, Environment and Sustainability Committee, RoP p18 – 20, 21 March 2013

⁶⁴ National Assembly for Wales, Environment and Sustainability Committee, RoP p109, 21 March 2013

Social Tariff Guidance

85. The *Flood and Water Management Act 2010* requires the Welsh Government to issue guidance to the water and sewerage companies and Ofwat to include social tariffs in their charging schemes. On 1 March 2013 the Welsh Government published guidance to enable water companies to develop social tariffs to support people who have most difficulty in paying their bills.⁶⁵ This guidance sets the framework for water companies to develop a social tariff if they choose to do so. The guidance includes what to consider when deciding if one group of customers should subsidise another. It also explains what Ofwat should consider when approving charging schemes.

86. Nigel Annett told the Committee that the guidance issued by the Welsh Government was helpful, but that the difficulty with social tariffs is that poorer customers are being cross-subsidised by those who can afford to pay. He added that it could be difficult to get approval from the regulator for the social tariffs, as they had been reluctant to support the extension of cross-subsidies in the past.⁶⁶ Mr Annett added that he was also concerned by the requirement that any cross-subsidies should be supported by customer acceptability; he referred to previous surveys which had shown that well-off customers were not always supportive of paying extra to subsidise those who were poorer. He believed that being unable to demonstrate customer support would be a reason for Ofwat not to approve the social tariffs.⁶⁷ In conclusion, he said that Dŵr Cymru would request “more robust support from the Welsh Government” for a subsidy of up to 2.5%.⁶⁸

87. Andrew Fairburn told us that the approach generally taken by Severn Trent Water was to ask customers how much cross subsidy there should be. He said that they had found customers to be content with a 1% cross-subsidy.⁶⁹

88. The representatives from CC Water welcomed the Welsh Government’s guidance on social tariffs, but added that the amount collected would not be

⁶⁵ Welsh Government, Topics, Environment and Countryside, Environment - Protection and Quality, Water, [Social tariff guidance](#) [accessed 14 March 2013]

⁶⁶ National Assembly for Wales, Environment and Sustainability Committee, RoP p29, 21 March 2013

⁶⁷ National Assembly for Wales, Environment and Sustainability Committee, RoP p31, 21 March 2013

⁶⁸ National Assembly for Wales, Environment and Sustainability Committee, RoP p31, 21 March 2013

⁶⁹ National Assembly for Wales, Environment and Sustainability Committee, RoP p138, 21 March 2013

sufficient to address the gap created by those unable to pay their bills. They also said that customer support for cross-subsidies would be needed and that “the Welsh Government’s support is very important in order to give the company legitimacy in forcing other customers to pay for social tariffs.”⁷⁰

89. Keith Mason from Ofwat told us that it was not within Ofwat’s remit to say whether some customers should cross-subsidise others, but that they would approve such tariffs if they were Government policy. He said:

“We have said that, if the Government was to say that social tariffs were the right policy to adopt and was to give some clear guidelines on the extent to which there should be cross-subsidy, we would support that and would approve tariffs where we would need to approve them.”⁷¹

The Committee’s view

90. The Committee welcomes the guidance on social tariffs published by the Welsh Government. We realise that the concept of cross-subsidising others may not be favourable to all customers, however capping the subsidy at 2.5% as proposed in the guidance would hopefully make a significant contribution towards addressing the shortfall whilst not placing too heavy a burden on those who would be paying more.

Bad Debt

91. Bad debt is a key water affordability issue in Wales, which the Welsh Government stated in its written evidence, adds £20 to every water customer’s bill.⁷² In its written evidence, Ofwat estimated that about £15 is added to each bill due to bad debt and noted that Dŵr Cymru had high bad debt costs compared with other water companies.⁷³ In oral evidence Ofwat stated that a number of factors can cause high levels of bad debt including a company’s efficiency in collecting money or the income profile of its customer base.⁷⁴

⁷⁰ National Assembly for Wales, Environment and Sustainability Committee, RoP p200 – 202, 21 March 2013

⁷¹ National Assembly for Wales, Environment and Sustainability Committee, RoP p158, 17 April 2013

⁷² National Assembly for Wales, Environment and Sustainability Committee, WG paper

⁷³ National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 7 – Ofwat*

⁷⁴ National Assembly for Wales, Environment and Sustainability Committee, RoP p187, 17 April 2013

92. In written evidence, CC Water stated that it looked forward to the Welsh Government enacting the debt collection provisions of the *Flood and Water Management Act 2010 (Section 45)*.⁷⁵ This would allow water companies to obtain information about non-owner occupiers of residential premises.⁷⁶ The CC Water representatives expanded on this in oral evidence, stating that it would enable easier debt-chasing from either tenants who have absconded or from the landlords who would be responsible.

93. In his written evidence to the Committee, the Minister for Natural Resources and Food said that the Welsh Government was working towards enacting the debt collection provisions of the *Flood and Water Management Act 2012*. He also said that the Welsh Government would be developing a consultation on Bad Debt Regulations, for publication later in the year, to place a duty on landlords to provide details of their tenants to their water company or face being held liable for any unpaid water bills at properties they own.⁷⁷

The Committee's view

94. The Committee realises the pressures placed upon water companies by unpaid bills and is acknowledges the difficulties they face in recovering these monies. We welcome the Welsh Government's commitment to develop Bad Debt Regulations and would encourage them to do so as a matter of urgency to assist water companies in tackling this growing problem.

⁷⁵ [Flood and Water Management Act 2010](#) [accessed 18 April 2013]

⁷⁶ National Assembly for Wales, Environment and Sustainability Committee, *Consultation Response WP 4 – Consumer Council for Water*

⁷⁷ National Assembly for Wales, Environment and Sustainability Committee, *E&S(4)-13-13 paper 1*, 1 May 2013

3. Water Strategy for Wales

95. In his written evidence, the Minister for Natural Resources and Food stated that he would be publishing a water strategy for Wales for consultation later this year. The paper said that the strategy will set out the Welsh Government's strategic direction for future water policy in Wales and will consider how it can support the economic, environmental and social needs of Wales.⁷⁸

96. The written evidence also said that the Welsh Government was undertaking a programme of stakeholder engagement to inform development of the draft strategy.

97. In an update letter to the Committee dated 8 July, the Minister said that he intended to publish the draft strategy for consultation in November 2013. In the letter, the Minister said that:

“The Water Strategy will be timely to provide direction to the water sector in Wales on the expectations of the Welsh Government and also to ensure that the needs of our citizens, environment and economy are suitably supported by our natural resources.”⁷⁹

The Committee's view

98. The Committee welcomes the Welsh Government's commitment to publishing a Water Strategy for Wales and looks forward to continued engagement with the Minister for Natural Resources and Food on its development.

⁷⁸ National Assembly for Wales, Environment and Sustainability Committee, *E&S(4)-13-13 paper 1*, 1 May 2013

⁷⁹ National Assembly for Wales, Environment and Sustainability Committee, *E&S(4)-20-13 paper 1*, 17 July 2013

Annex A - Terms of reference

The purpose of the inquiry was to consider:

- What impact the Draft Water Bill would have on competition in the non-household market in Wales;
- Whether there are any specific issues that might arise from having different market regimes in Wales and England for non-household customers, particularly in border areas;
- What current mechanisms does the Welsh Government have in place to ensure water affordability in the household market;
- What progress has the Welsh Government made on its commitments set out in its Programme for Government Update (May 2012);
- Whether there is anything further the Welsh Government should be doing to ensure water affordability in the household market;
- With specific regard to affordability and competition, what should the Welsh Government include in its forthcoming Water Strategy.

Annex B - Witnesses

The following witnesses gave evidence to the Committee. Transcripts of the meetings can be viewed at

<http://www.senedd.assemblywales.org/mglIssueHistoryHome.aspx?lId=1308>

21 MARCH 2013	
Session 1	
Nigel Annett	Dŵr Cymru
Mike Davis	Dŵr Cymru
Session 2	
Andrew Fairburn	Severn Trent Water
Session 3	
Diane McCrea	Consumer Council for Water Wales Committee
Tony Smith	Consumer Council for Water
17 APRIL 2013	
Session 4	
Keith Mason	Ofwat
1 MAY 2013	
Session 5	
Alun Davies AM	Minister for Natural Resources and Food
Prys Davies	Welsh Government
Olwen Minney	Welsh Government

In addition to the formal oral evidence, the Outreach Team has produced a video package that includes contributions from businesses and organisations in the private and public sector.

The purpose of the video is to demonstrate what businesses and staff working for public sector bodies considers to be the strengths and weaknesses of the current system, and to explain the potential advantages and disadvantages the proposals would have on their organisation.

The video can be viewed at:

<http://www.assemblywales.org/water-policy-wales-2013-video-evidence>

Listed below are the organisations who agreed to take part who and appear in the video.

<i>Name</i>	<i>Organisation</i>
Alison Pall	Stonehouse Brewery, Oswestry, Shropshire
Nick Oulton	Rhallt Care Home, Welshpool
Buster Grant	Brecon Brewing, Brecon
Eric Thomas	Facilities Services, NHS Wales Shared Services
Christopher Lewis	Partnership
David Mundow	Aneurin Bevan Health Board
Sandy McIntyre	Plas Coch Holiday Homes, Anglesey
Renia Kotynia	Wrexham County Borough Council
Michael Cantwell	
Emma Davies	
Will Pierce	Flintshire County Council
Graham Jones	Federation of Small Businesses and Member of the Dee Valley Water Consumer Panel
Antony Smith	Wyastone Estates Ltd, Monmouth
Mark Woolfenden	Afonwen Laundry Ltd, Gwynedd
Mark Drew	Waterworld Leisure and Activity Centre, Wrexham
Andrew Barron	Powys Teaching Health Board

Annex C - Written Evidence

The following written evidence was received. All written evidence can be viewed in full at

<http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?Ild=5272>

<i>Organisation</i>	<i>Reference</i>
Dee Valley Water	WP 1
Severn Trent Water	WP 2
Save the Children	WP 3
Consumer Council for Water	WP 4
Water Industry Commission for Scotland	WP 5
Dŵr Cymru	WP 6
Ofwat	WP 7