

June 2025

The Rivers Trust's response to the Independent Water Commission's interim report

Key gaps the Commission must address in its final recommendations:

- Water quality, water quantity, and habitat quality must be addressed in the round to deliver true catchment resilience.
- Fully funded and mandated CaBA Catchment Partnerships are needed to underpin new regional planning.
- A unified approach to catchment monitoring, including citizen science, is necessary to drive effective delivery.
- Streamlined regulation and enforcement that is firm but fair and is properly funded will be essential to drive transformational change in the system.
- Legislation must retain environmental ambition and retain the key principles of the Water Framework Directive.

The Rivers Trust welcomes the direction of travel set out in the Independent Water Commission's interim report, which reflects many of the recommendations made by us and fellow environmental groups in our evidence submissions. However, we urge the Commission to go further and be bolder, to reflect the fact that water is fundamental to nature's recovery, the growth of the economy, the health and security of communities, and to life itself.

The interim report rightly recognises that the current planning, management and regulation of our water system is not delivering for the environment, people, or economy. The Rivers Trust is particularly glad to see that the Commission has picked up on the need to take a more integrated approach to water management that involves all sectors, aligns planning and funding at a regional level and drives action throughout the area of land that drains into our rivers – at the river catchment scale. We also welcome the recommendation for an overarching water strategy to provide clearer strategic guidance for regulators, water companies, local government and practitioners.

However, there are notable gaps in the interim report that The Rivers Trust urges the Commission to address ahead of making final recommendations to the Government. To deliver transformational change in our water environment the review must call out the need to drive local delivery, boost environmental monitoring, and optimise legislative and regulatory frameworks; all are essential ingredients for a reformed water system that delivers for people and nature.

In terms of general framing the report, there was very little recognition of the importance of healthy water environments for a resilient future in terms of climate mitigation and adaptation, and nature recovery. The Rivers Trust is clear that water quality, water quantity, and habitat quality (including connectivity), must be managed in conjunction with each other to ensure the water system delivers for nature, people, and businesses.

These three pillars of river health are [referred](#) to as the “trinity of ecological health” in CaBA’s Chalk Stream Strategy, which together help build overall catchment resilience. Healthy river catchments are critical natural infrastructure, a key component of the water system that contribute to the capacity and performance of water company assets/infrastructure and the collective long-term resilience of our water system to climate and population pressures.

Many of the issues facing our environment and communities stem from too little or too much water, so it is critical that changes to the water system enable better management of this critical resource. We were concerned that there was very little mention of water resources in the interim report and even less about flooding, even though these pose serious challenges for the water system and exacerbate water quality issues. Just recently, the Environment Agency has forecast a 5 billion litres per day shortfall in public water supply by 2055 and reports that 16% of surface water and 27% of groundwater bodies are already affected by unsustainable abstraction.,while 8 million properties could be at risk of flooding – around 1 in 4 properties – by the middle of the century. Resilient river catchments help us tackle these challenges. The ecosystem services of healthy, well-functioning catchments, as well as the inherent benefits of restored nature need much greater and clear recognition throughout the report. We urge the Commission to apply this holistic approach in its final recommendations, highlighting the role of strategic direction from Government and regional planning to plan for overall catchment resilience.

It is critical that we make the most of this once-in-a-generation opportunity to transform our water system. The Rivers Trust expects the Commission to be bold in its final report, reflecting the scale of the issues we face, including polluted and over-abstracted rivers, flood and drought prone communities and neglected infrastructure – both grey and green. The Commission must set out clear recommendations for radical change, which must be adopted by the Government.

Regional planning must be underpinned by effective catchment-based delivery

The Rivers Trust welcomes the recognition in the interim report of the need to plan for water across sectors at a regional level and ensure that this is rooted in hydrological boundaries. However, it is critically important that planning is underpinned by the means of delivery, which is why we urge the Commission to turn greater attention to the role of Catchment Partnerships in its final recommendations.

As set out in the Catchment Based Approach’s (CaBA) submission to the Call for Evidence, Catchment Partnerships have the potential to play a key role in a more integrated approach to water management. With 10+ years of experience convening and facilitating cross-sector collaboration and delivery at a local level and, using data to determine priorities for action on the ground, Catchment Partnerships should become

the focal point of strategic delivery that underpins national and regional planning. The considerable social capital they have built over the years, with farmers, Local Authorities, water companies, and citizens, will be key to translating plans into action.

CaBA Catchment Partnerships have already been delivering innumerable benefits for the environment, society, and economy, contributing meaningfully towards our national environmental targets, despite receiving very limited core funding from Government (£7.5k to £15k per annum per partnership) and enduring a real-terms funding cut every year since their formation. Where certain CaBA Catchment Partnerships have managed to draw in funding above and beyond Government's limited input, they demonstrate just how effective these groups can be at supporting holistic land and water management.

Case Study One: Crane Valley Partnership

The Crane Valley Partnership is a clear example of how long-term partnership working drives progress in even the most complex of circumstances; in this case, an urban river system that moves through multiple London boroughs, is cross-cut by major roads, railways, and airports, and is impacted by a plethora of issues that left it in extremely poor condition. The Crane Valley Partnership augmented their limited core government funding with a long-term contribution from the local water company and significant additional funding from third parties; securing this diverse range of funding enabled the group to deliver environmental and community benefits at scale. The Rivers Trust urges the Commission to review Crane Valley Partnership's submission to the Call for Evidence, which makes clear the case for strengthening the role of Catchment Partnerships.

Much of the problem with our current planning framework is that we have too many siloed plans for individual elements of the water system (drought, drainage, flooding, diffuse water pollution) and a lack of integrated planning to bring these disparate programmes together. This precludes the realisation of holistic and synergistic outcomes. Also, River Basin Management Plans (RBMPs) are too large-scale to include specific measures for individual water bodies, as demonstrated by the recent Costa Beck legal case. There has also been no mechanism for funding, or accountability for, delivery of the measures in RBMPs. Despite a lack of resourcing and formal mandate limiting their full potential, CaBA Catchment Partnerships have been putting into practice a more integrated, systems approach to managing our water environment; Catchment Management Plans have taken a view across the river catchment scale, from headwaters through rural and urban landscapes through to coastal environments, and identified priorities for multi-sector action in land and water management.

Case Study Two: The Eden Catchment Plan

The Eden Catchment Partnership has produced the [“Revitalising the Eden: The Eden Catchment Plan”](#), which is a strong example of long-term, integrated planning that has the potential to transform delivery of environmental, social, and economic benefits. The Partnership itself brings together 20+ organisations, including statutory agencies, local government, water and other private sectors, environmental and community groups, and academics, thereby grounding itself in a truly cross-sector approach.

The Plan effectively uses granular data of the local area, translated into opportunity mapping, to identify and prioritise the action needed over the next ten years to manage Eden’s rivers sustainably whilst improving the natural ecosystem services provided by the catchment. The Plan aims to help members of the Partnership better target their activities to places which will have the great benefit for both Eden’s environment, people, and businesses.

Rooted in a deep understanding of the local area, the Plan can be responsive to local pressures. For example, with 29 communities at risk of flooding, the refreshed Plan pays increased attention to flood risk management. The Plan is also particularly targeted to address agricultural pollution and poor septic tank management, as these pose significant threats to water quality in the area.

Reforms to the water system should build on this CaBA approach, which has proven to be effective, and provide proper funding for Catchment Partnerships to deliver integrated plans that reflect a more detailed understanding of the full range of pressures and opportunities that exist at a local scale. The regional bodies proposed as part of a new framework of governance would then be responsible for providing the funding to deliver the multiple Catchment Management Plans in their region and ensuring that plans deliver against the Government’s strategic priorities.

The Rivers Trust is clear that the Commission’s final recommendations should include a formal role for Catchment Partnerships within an integrated governance framework, and back this up with recommendations for increased and sustained funding and strengthened mandate. Strong, local coordination and facilitation is vital for the planning and delivery of a systems approach to the management of water.

Comprehensive monitoring to drive effective delivery

The Rivers Trust urges the Commission to address our system of monitoring catchment health in its final recommendations, as this crucial piece of the puzzle was missing in the interim report. Plans and legislation will fail at the point of implementation and

delivery if we do not have a clear understanding of all the pressures affecting our water environment. We need an effective and holistic way to monitor the water environment that harnesses the various sources of data available. Citizen science must play a role, as it can help produce reliable high quality data at greater density to help identify issues, target solutions and focus regulatory monitoring; we cannot rely solely on technological solutions, which are often resource-intensive and costly, to capture the level of detail required to inform effective delivery.

Data gaps and siloed access to data is negatively impacting our ability to make the best, most cost-effective decisions, which hinders our progress towards environmental targets, national resilience, and economic growth. Currently, monitoring efforts are fragmented, reactive, and overly focused on water sector impacts, and therefore do not capture systemic catchment complexities. For example, our monitoring of the duration of storm overflows is now extensive, but will tell us very little about impacts on the environment or implications for public health; even the more extensive monitoring required of water companies under s82 of the Environment Act will not provide insight into the presence of harmful chemicals or antimicrobial resistance for example. Meanwhile, monitoring of highways outfalls is still almost non-existent and monitoring of agricultural and chemical pollution is highly inadequate. For example, we currently have no means of assessing or monitoring the requirement for agriculture to reduce its Phosphorus pollution by 40% as required by the Environment Act, so there is little hope that this target will be achieved. Patchy data and a lack of consistent resourcing for citizen science programmes results in reduced transparency and the further erosion of public trust.

Having been set up largely in response to public outcry about water sector performance and the lack of transparency surrounding it, the Commission must highlight the critical importance of monitoring and the provision of accessible data as part of its final recommendations for reform. Ensuring that the system is more transparent going forward will be key to rebuilding public trust, and this is where citizen science has so much to offer. Citizen science can get the public directly engaged, build their understanding of the complexities in the water system, grow the local evidence base, and contribute to open-access data. Where citizen science is used positively to identify issues and drive solutions, this can start re-building broken bridges between customers and the water sector.

A comprehensive monitoring system, that is collaborative and open-access, can be an important part of healing public trust in the water system, as well as providing the detailed information that can drive the right solutions in the right places. Research carried out as part of the Additive Catchments project, which is exploring ways that water companies can effectively carry out their continuous water quality monitoring requirements under s82 of the Environment Act 2021, has found that the public is far

more likely to trust information coming from a third party rather than water companies, regulators, or government bodies, demonstrating clearly the benefit of implementing a more collaborative approach to monitoring. We refer the Commission to evidence submitted by the CaSTCo Taskforce, which set out six clear recommendations for creating a unified catchment monitoring framework.

Case Study Three: The Catchment Systems Thinking Cooperative (CaSTCo)

The CaSTCo Taskforce was set up as an operationalising arm of the main Catchment Systems Thinking Cooperative (CaSTCo) project, which is an Ofwat Innovation Fund initiative that brings together more than 30 organisations to demonstrate how citizen science can be used alongside professional monitoring. Work carried out by CaSTCo partners in demonstrator catchments across the country has shown how taking an integrated approach to monitoring offers innumerable opportunities to improve environmental, as well as social and economic, outcomes.

For example, work carried out by the Wensum Catchment Partnership harnessed the power of citizen science to identify and resolve a pollution source, namely a faulty septic tank system, with local partners setting out protocols to ensure the data gathered was rigorous and effective. This project demonstrates the way integrating monitoring efforts from communities, regulators, and environmental groups can build more granular data to inform effective solutions.

The CaSTCo Taskforce, a coalition of 50+ stakeholders and experts from across sectors, has been set up to develop a national roadmap for collaborative catchment monitoring, building on learnings from demonstrator projects. The Taskforce submitted evidence to the Commission, which set out six key recommendations to create a more comprehensive and unified approach to catchment monitoring. The Taskforce sets out the need to bring together diverse data sources, including regulatory measurements, citizen science and remote sensing, that capture a fuller range of catchment pressures, ensure that this data is accessible for all stakeholders and decision-makers, and establish transparent processes so that data links to policy decisions and then to delivery.

The Rivers Trust urges the Commission to take a closer look at monitoring, and at the solutions set out by the CaSTCo Taskforce, ahead of making final recommendations. We believe this is fundamental to restoring trust, accountability and effective decision-making around the expenditure of hundreds of billions of pounds.

Streamlined regulation that is firm but fair

The Commission rightly acknowledges that the high level of complexity in the current regulatory framework and the lack of capacity and conflicting remits among regulators, is resulting in a system that does not deliver desired outcomes, especially on environmental performance. The Commission further highlights that the public has lost trust in this system due to its underperformance and lack of transparency. The Rivers Trust highlighted all of these concerns in our response to the Call for Evidence and would like to stress that these issues have only become more pressing following the real-terms cuts to Defra's budget announced in the June 2025 Spending Review, which will put extra strain on regulator resourcing.

In our submission, The Rivers Trust stressed the importance of enabling firm but fair regulation that is properly resourced, in order to hold all sectors to account for poor performance and also to enable the innovative solutions that will restore our rivers and their catchments. We welcomed the Commission's clear conclusion that environmental regulators must be properly resourced, on a stable and consistent basis, to carry out their roles. In our submission, we highlighted that our proposal for integrated catchment governance, with formalised regional-scale governance and a strengthened role for Catchment Partnerships, could allow the Environment Agency to focus on regulatory activities, such as monitoring, investigating and enforcing, leaving planning and partnership delivery to others. By narrowing the Environment Agency's remit, available resources could be used more effectively. We urge the Commission to consider our submission on this point further and assess how a shift in responsibilities as part of an integrated catchment governance framework could improve regulatory performance, while continuing to enable innovative, partnership working.

We note that the Commission's interim report did not make recommendations for changes to the 5-year planning cycle that currently operates in the water industry. As set out in The Rivers Trust's original evidence submission, we believe that this cycle is very restrictive of innovation and partnership working for several reasons. Firstly, water companies do not have sufficient time to scope and identify opportunities for collaboration in the short window between receipt of their instructions from the Environment Agency and submission of their draft plans; this tight timeline significantly impacts the ability of environmental organisations to engage with the process and help develop partnership initiatives. Additionally, the five-year deadlines create periods of frenzied planning before everything is set in stone, whereafter changes to delivery plans, in light of new information or changed circumstances, are complicated and expensive to enact. The Rivers Trust would advocate for longer-term strategic planning and then a more nimble, iterative approach to the planning, implementation and review of schemes within that strategic framework. This would enable more collaboration with other sectors in delivery, resulting in more cost-effective, multi-benefit outcomes. The

Rivers Trust urges the Commission to review our evidence on this issue ahead of final recommendations, particularly with a view to enabling partnership solutions.

Building on that point, and on The Rivers Trust's original evidence submission, we urge the Commission to look in more detail at the barriers to partnership and nature-based working, particularly involving environmental organisations. While we welcome references in the Commission's interim report to reducing barriers to nature-based solutions and streamlining regulation, flagging the Corry Report's recommendations, we would like the Commission to address specific blockers that environmental groups, such as Rivers Trusts, face when trying to deliver river and catchment restoration projects, namely:

- Inflexible and disproportionate regulations e.g. around Flood Risk Activity Permits.
- Tight timelines in water sector planning prevent eNGO input e.g. WINEP.
- Overly-onerous procurement procedures in water companies prevent eNGOs securing delivery contracts.
- Administrative uncertainty and delays around nature funds heap risk, cashflow issues, and practical delivery challenges onto third sector.

These many issues facing partnership delivery, set out in detail in our main evidence submission and in our proposal for an integrated catchment governance framework, are preventing meaningful progress towards improved water sector performance and our shared environmental goals. It is critical that the Commission fully addresses these barriers in its final recommendation, for example building on the Corry Report's recommendation to streamline regulatory processes for trusted third sector delivery bodies.

Legislative framework that drives ambitious environmental improvement

The Rivers Trust is glad that the Commission recognises the critical role ambitious targets have played, and will continue to play, in driving improvement. We also agree with the Commission's emerging conclusion that there is a strong case for reviewing and rationalising the legislative framework for water. There are many different pieces of legislation affecting the water sector, which are not aligned and, in some cases, are contradictory. While simplifying the legislative landscape could have significant benefits, we recognise the challenges this would pose, with many stakeholders likely to perceive risks of eroding protections provided by certain laws and the difficulty of finding sufficient parliamentary time and resource within Defra to do the necessary work. We are also wary of embarking on lengthy and resource-intensive legislative work, which could delay progress, when changes to implementation could more immediately speed-up delivery.

The Rivers Trust is clear that we already have a lot of the tools we need but have thus far been failing on implementation. According to the Office for Environmental Protection (OEP) for example, the WFD is fundamentally good legislation but has seen a lack of progress due to failures to implement it meaningfully. We would not want to see lengthy and uncertain review processes unnecessarily delay immediate action to restore our rivers and their catchments. We would rather efforts were focused on the way in which specific measures can be identified for each catchment and establishing a clearer pathway for funding to be directed to cost-effective delivery.

Therefore, while the Commission seems to intend to stop short of recommending specific changes to the Water Framework Directive (WFD), leaving that to a potential future review, The Rivers Trust strongly urges the Commission to put on record its support for the underlying principles of the WFD in its final report. This would reflect the OEP's findings that the WFD is good legislation that should not be lost and would also reflect the views of many environmental groups, as set out in Blueprint for Water's "Future of Water Policy" paper. The WFD is a strong piece of legislation that takes an outcomes-based approach and has an in-built cost-benefit assessment that ensures targets will provide an overall economic benefit. As part of any review of the WFD, we must retain its science-based approach to assessing the status of rivers, lakes, and coasts, which is based on genuine outcomes for the water environment, a holistic assessment of pressures, and the one-out-all-out principle. WFD's no deterioration principle must be retained. As environmental groups have consistently set out, straightforward changes to the way in which progress is reported and communicated, i.e. through an "elements improved" indicator, would ensure positive progress is visible but the scientifically rigorous one-out-all-out approach is maintained. The Rivers Trust urges the Commission to highlight the importance of these principles in its final recommendations.

The Rivers Trust welcomes the Commission's recognition that more needs to be done to protect public health, for example via WFD, with increasing amounts of people using our waterways for recreational and sporting purposes. Furthermore, many of the solutions to improving the water environment for public health and for environmental health are overlapping. The Rivers Trust has long advocated for improved monitoring of designated bathing waters, as well as designated shellfish water protected areas, and other heavy use areas, to boost public health protection. Critically, we need to see increased monitoring of chemicals and antimicrobial resistance, and more direct and accurate monitoring for harmful pathogens at these sites. For example, instead of monitoring for faecal indicator organisms (that are often poor predictors of actual pathogens) at bathing waters, regulations should require monitoring of the pathogens that actually cause harm, namely norovirus, campylobacter, cryptosporidium and salmonella. We have long advocated for strengthening the existing Bathing Water

Regulations and ensuring the full range of well-used sites, both inland and coastal, are formally designated. We need to see many more inland bathing water designations to better protect the many thousands of people making use of our rivers and lakes; we hope to engage with Defra on recent reforms to the bathing water regime to ensure these do not impede designations of inland sites.

Therefore, The Rivers Trust supports the Commission's support for a holistic approach to monitoring and regulation that addresses both environmental and human health. It is critical, however, that public health objectives are applied in a targeted, proportionate way, focusing on waterbodies that are well-used by people. We should not be applying public health objectives and requiring monitoring for health determinants at every waterbody, as this could result in disproportionately expensive monitoring that could incur too great a cost delivering outcomes with minimal benefit for the environment or communities, but we do think that this monitoring should be risk based and therefore carried out at sites which are regularly used for swimming, paddle sports, and play.

The Water Commission must call for urgent action from the Government

Overall, The Rivers Trust welcomes the direction of travel set out in the Commission's interim report. However, we will expect the final recommendations to go further, be bolder, recognising the strength of public feeling about the need to restore our water environment and fix failures in the water system.

The state of our rivers requires urgent action and there is much that can be done, and done better, now without the need for further review or legislative change. Therefore, we urge the Commission to be very clear in its recommendations where the Government must take immediate action.

Ultimately, a healthy and well-functioning water environment is a critical national asset, underpinning the water sector, and the supply and services it provides to customers, while also sustaining all other sectors, enabling economic growth, boosting climate resilience, and supporting the wellbeing of our communities. The Commission's final report must reflect the scale and urgency of the need for change.

About The Rivers Trust:

The Rivers Trust is the umbrella organisation for our 65 member Rivers Trusts across Britain, Northern Ireland and Ireland. We are river and catchment conservation experts with a wealth of data and expertise at our fingertips. We work with our member trusts to make our shared vision a reality: wild, healthy, natural rivers, valued by all.

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