

## Written evidence submitted by British Canoeing

### Introduction

1. British Canoeing is the National Governing Body for paddlesports in the UK, ranging from the recreational participant to the international athlete. Our key role is to protect and enhance the freedom to paddle and promote the interests of all paddlers. The purpose of British Canoeing is to inspire people to pursue a passion for paddling for health, enjoyment and friendship, challenge and achievement. We are committed to protecting the places we paddle and securing fair, shared access on waters.
2. There has never been a more important time to enable people to be active and to connect with nature. There is a growing body of evidence that demonstrates that greater access to green and blue spaces can help tackle some of the biggest challenges we face, from the climate emergency to rising obesity and the mental-health crisis. Covid-19 has brought into even sharper focus the importance of people being active outdoors.
3. Recreational waterway users are extremely concerned that our waterways are being used as open sewers. Our health and wellbeing is being put at great risk by the potential transmission of viruses carried in raw untreated sewage that has been discharged into our rivers.
4. Nationally an estimated 2.1 million people<sup>1</sup> go paddling each year. In 2020, British Canoeing membership rose from 36,500 to 63,000 as more people discovered paddlesport. Significant increases in people Wild Swimming and Angling were also reported.
5. Pollution in our rivers and waterways is threatening the health of recreational waterway users as well as harming our precious natural environment. Latest figures from the Environment Agency report that none of our rivers were in good overall health and only 14% met good ecological status within the Water Framework Directive; this must change.
6. Natural England MENE data suggests that visits to the natural environment, steadily increased to 4bn in 2019<sup>2</sup>. Further, the latest 'People in Nature' results (November 2020)<sup>3</sup>, suggest that month on month, visits to the green and natural places continued to rise through 2020. Over a quarter of visits were made to 'rivers, lakes and canals' and a third of visits made for exercise.

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<sup>1</sup> Arkenford (2019), 'Watersports Participation Survey)

<sup>2</sup> Monitor of Engagement with the Natural Environment Report (2019), Natural England

<sup>3</sup> [The People and Nature Survey for England: Monthly interim indicators for November 2020](#), (Jan 2021)

**Question 1: What are the best indicators for river water quality that could be used as targets being developed under the Environment Bill?**

7. As a member of the Wildlife and Countryside Link coalition, British Canoeing is in full support of recommendations put forward in response to Defra's Environment Bill Targets Policy Paper<sup>4</sup>. These are summarised below.
- A general pressure reduction target. This would have wider applicability than targets for nitrates or phosphorus for defined water bodies, and would drive action for *all* waters, not just WFD water bodies.
  - A percentage target for the area of all surface waters meeting clean water standards, equivalent to WFD high status. This should supplement, but not replace, ongoing outcome targets for waters in line with WFD good status.
  - An increasing score approach to drive ongoing improvements in all catchments, based on specific sub-metrics, for example, percentage of all waters with natural water quality.
  - A target on the number of (preferably groups of) chemicals for which a threshold value has been defined. This could inform development and operation of an early warning system, when thresholds for individual or mixed substances are approached, leading to prompt action including practical management measures, and consideration of regulatory control, as proposed by the Environment Agency.
8. British Canoeing would specifically welcome the following target areas:
- Statutory Targets for the reduction in the duration and frequency of discharges made from Combined Sewage Overflow's (CSO's) in **all** waters **all** year round with an end to untreated sewage discharge in all Bathing waters by 2030.
  - Statutory targets for designating a minimum number of inland bathing waters, in each water company area for each year of any price review period
  - Statutory targets for the number of watercourses with designated bathing water status classified as 'good' or 'excellent'
9. It is essential to have open and transparent reporting of all indicators within the Annual Water Company Environmental Performance Report published by the Environment Agency. Government must make a legal commitment to maintain and improve Water Quality standards now that we have left the EU.

**Question 3: How adequate are the monitoring and reporting requirements around water company discharges? How can technology improve and assist with transparency and enforcement?**

10. We welcome the recent announcement of the Storm Overflow Task Force Group's goal 'to eliminate harm from storm overflows' along with commitments from the water industry to:
- Increase transparency around CSO discharges by publishing the data on their websites annually
  - Provide real time data on CSO discharges into bathing water locations all year round.
11. Current monitoring and reporting requirements do not go far enough to protect the health of recreational users from the threats posed by discharges. The announcement fails to address CSO's discharging raw sewage into popular recreational locations, which are **not** classified as designated 'Bathing Waters'.

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<sup>4</sup> [https://www.wcl.org.uk/docs/2020/Environment\\_Bill\\_Targets\\_Paper\\_Part\\_2\\_Proposals\\_07.10.20.pdf](https://www.wcl.org.uk/docs/2020/Environment_Bill_Targets_Paper_Part_2_Proposals_07.10.20.pdf)

12. In England, only one UK river, the River Wharfe at Ilkley, holds Bathing Water Status. The vast majority of recreational river users are unable to make an informed choice about where and when they paddle to avoid sewage pollution.
13. The Environment Agency relies on water companies to self-monitor CSO discharges, recording when they spill and for how long. Whilst some progress has been made to install Electronic Data Monitoring (EDM) systems on some CSO's, there must be commitment to fit EDM's on **all** CSO outlets by 2026 at the latest.
14. It is imperative for an enhanced real-time water quality testing regime which goes further than the current system and shows emerging threats to health such as antibiotic resistant bacteria. Government needs to instruct legislation that covers a wider range of contaminants than currently monitored in wastewater discharges, treated sewage sludge, and the environment.
15. The data must be published in a clear, logical and consistent way to ensure transparency in performance of assets and it must include number, frequency, volume and flow for all coastal and river wastewater discharge. Water companies must do more to fully safeguard the growing number of people who rely on these natural amenities for health, prosperity and wellbeing.
16. We welcome the commitment of 798 CSO's assets to be improved between 2020-2025. It is essential for the worst performing CSO's to be identified in order to focus urgent remedial action and investment, along with CSO's on inland waterways, particularly around popular recreational locations. Given there are 21,462 CSO's and pumping stations in the UK (excluding Scotland)<sup>5</sup>, it is imperative that improvements are rolled out at a faster rate with clear statutory targets.
17. Whilst British Canoeing recognises the benefits of additional inland Bathing Water Status locations, it is noted that the Bathing Water Quality Directive has an optional provision for up to 15% of water samples for any Bathing Water to be discounted if they are affected by "short term pollution events" (i.e. sewage discharge contamination undermining the Pollution Risk Forecast (PRF's)<sup>6</sup>. The monitoring information must be reliable, transparent and robust. These short term events still pose a significant threat to public health and whilst such incidents are legally required to be notified to the public both online and on site, the provision of flexibility on the reporting side creates a lack of transparency within the system.
18. Improvements in transparency and enforcement cannot be achieved through technology alone. The Environment Agency should be adequately funded to enable them to conduct the required monitoring and enforcement. Between 2009-2019, Environment Agency funding fell 63% and water quality sampling was reduced by a third with fewer sites being monitored.<sup>7</sup>

**Question 4. What is the impact of plastic pollution and other materials on drainage and water quality in rivers and what should be done to mitigate it?**

19. Research led by Bangor University and Friends of the Earth found that microplastics were present in all UK inland waters tested, highlighting the need for widespread monitoring of inland water systems in the UK<sup>8</sup>. Rivers are a pathway of microplastics to the ocean, which several Defra funded projects highlight as a growing area of concern<sup>9</sup>.

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<sup>5</sup> <https://www.sas.org.uk/campaign/combined-sewage-overflows/>

<sup>6</sup> <https://environment.data.gov.uk/bwq/profiles/help-understanding-data.html>

<sup>7</sup> Rose, E (2020) 'The UKs Enforcement Gap'

<sup>8</sup> <https://friendsoftheearth.uk/sustainable-living/microplastics-found-every-british-river-we-tested>

<sup>9</sup> <https://www.gov.uk/government/news/government-launches-microplasticsresearch-to-protect-oceans>.

20. Plastic pollution from land based sources block drains causing flooding, economic loss (including recreational tourism) and is a threat to wildlife through ingestion and entanglement. Studies have found that plastics can act as a raft increasing the transportation opportunities for invasive non-native species<sup>10</sup>, some of which are known to clog up our waterways. Species such as Floating Pennywort can grow up to 20 cm a day and block entire watercourses.
21. Plastics also enter the environment in the form of mis-flushed items such as wet wipes again causing blockages and potentially harbouring viruses<sup>11</sup>. This not only puts the environment at risk, but also recreational users such as swimmers and paddlers. The full consequences of microplastics for organisms, ecosystems and human health are not yet known, but we should not wait until any harmful effects are determined to act.
22. There is currently no requirement for water companies to monitor microplastics, this must change. The monitoring of microplastics in waterways is vital to assess the health of the environment and their impacts on public health. Microplastics should be added to the list of pollutants regularly monitored in inland waters, requiring agreement of an accurate, repeatable, reportable method for microplastic quantification to ensure a wider range of contaminants are monitored in wastewater discharges along with increased monitoring of treated sewage sludge, which captures the microplastics in high quantities<sup>12</sup>.
23. There is a growing understanding of the role river corridors (banks and sediment) play in retaining significant amounts of microplastics.<sup>13</sup> A review of current treatment practice, and a road map towards zero contaminants by 2030 is urgently needed. This should include annual reduction targets, and address concerns around antimicrobial resistant bacteria.
24. In January 2019, the water industry launched the Fine to Flush specification (WIS 4-02-06) in response to products being labelled as flushable, but which still potentially blocked the sewer systems. Legislation should be introduced requiring that terms "flushable", "dispersible" or similar can only be used if the wipe has been proven to pass the "Fine to Flush" specification. Products should otherwise be clearly labelled with "Do Not Flush", which should be statutory, standardised and have a minimum size<sup>14</sup>.
25. Further measures to mitigate the impact of plastic pollution should be introduced and include the reduction of products known to contribute to the polluting content of sewage by:
  - Establishing a regulatory standard for flushable products
  - Prohibiting the use of plastics in sanitary products and wet wipes
  - Reducing the use of microplastics in any other flushable products
  - Prohibiting the disposal of fats and oils into sewers by food service establishments

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<sup>10</sup> <https://www.energylivenews.com/2019/08/02/floating-plastic-waste-can-carry-invasive-species-across-oceans/#:~:text=It%20warns%20the%20quantity%20of,important%20processes%20such%20as%20nutrient>

<sup>11</sup> <https://www.plasticsoupfoundation.org/en/plastic-problem/health/pathogens/>

<sup>12</sup> Alice A. Horton et. al., 2020, Semi-automated analysis of microplastics in complex wastewater samples, Environmental Pollution Volume 268, Part A, 1.)

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<https://www.sciencedirect.com/science/article/abs/pii/S0269749117332797#:~:text=The%20average%20abundance%20of%20microplastics,commonly%20distributed%20in%20river%20sediments>

<sup>14</sup> <https://www.water.org.uk/wp-content/uploads/2019/11/Fine-to-Flush-Issue-1.2-November-2019.pdf>

26. There is an urgent need to move to a circular economy where plastic never becomes waste or pollution. Steps should include:
- Manufacturers eliminate unnecessary plastic through designing it out, re-design and innovation making it fit for purpose where it is required
  - Innovative re-use models to be adopted including designing out waste
  - All packaging to be reused, recycled or composted, ensuring the infrastructure is in place, with manufacturers contributing to the cost
  - The use of recycled plastics must be maximised, reducing the need to use virgin plastic and seeking innovative replacements where required such as bio-plastics.
  - All plastic must be free from hazardous chemicals that have a negative effect on the health of people when in use and when unintentionally released into the environment.
27. Within the paddlesports industry, manufacturers are working hard to reduce their impact on the environment both locally and globally. Our partners are using recycled fabrics in paddle gear where possible and finding ways to eliminate packaging. PVC free dry bags are now available, as are 100% recycled kayaks. Our clubs are finding ways to reduce their use of avoidable plastic within local communities. There is a real drive, passion and commitment to reduce the impact on the environment by the paddling community.
28. The enthusiasm of volunteers should be harnessed, to remove larger plastic pollution before it breaks down. There are thousands of dedicated paddlers proactively removing tonnes of plastic pollution and junk from our waterways. In 2020 alone, in excess of 70 paddle cleanups were registered with British Canoeing resulting in over 1,000 large sacks of plastic pollution and additional junk including a motorised scooter, a small refrigerator and a Christmas tree being removed from our waterways.
29. Volunteer paddlers are well placed to support citizen science projects. They can be the eyes and ears as well as the guardians of our natural environment.
30. British Canoeing is actively reducing use of avoidable plastic and has committed to a sustainability strategy to minimise our impact on the environment. The organisation will be seeking to set itself ambitious targets in its 2022-26 strategic plan.
31. To complement regulation, monitoring and compliance a national behaviour change campaign must be established to work with communities and raise consumer and public awareness. A proactive approach is required to reduce contaminants entering the system, by working together to fund projects which identify and implement interventions to stop pollutants at source.

**Question 5: How can consumers be persuaded to change their behaviour to minimise pollution?**

32. Consumer awareness is critical to encouraging behaviour change. Research has shown that increasing consumer awareness through water labelling and smart meters led to behaviour change and reduction in water consumption.
33. Public awareness of the issue of water pollution is low. A WWF report showed half of the population were not aware that raw sewage could even be released into rivers and 35% have flushed/put down the drain something that they shouldn't in the past month<sup>15</sup>. Once informed, 80% think it is never acceptable to release raw sewage into rivers and 87% think the public must be told when this happens.

34. The Government must show clear leadership and commitment through world leading legislation, monitoring and enforcement action to stop raw sewage being discharged into our rivers, if consumers are to be encouraged to change their behaviour. Greater quality, quantity, and transparency of environmental data is vital to increasing customer awareness. Data on water quality, and events such as CSO discharges, should be public and easy to interpret. Water companies should develop ways to communicate to the public about sewage pollution and prevention, and should make information about pollution and overflows more publicly available.
35. A national awareness campaign should be delivered highlighting the issue and identifying how consumers can be part of the solution by making simple changes; such as only flushing the three Ps; using water wisely in the home; and installing a water butt.

**Question 11: How could the designation of inland bathing waters by water companies affect the costs of achieving the associated water quality standards?**

36. Within its 25 Year Plan for the Environment, the Government has committed to being the first generation to leave the environment in a better state than it was found. Further, it has also set out to 'enhance beauty, heritage and people's engagement with the natural environment'. With this in mind, investment in improving water quality for people and nature, must not be overlooked.
37. It is clear that significant investment is going to be required to improve water quality in our rivers to meet higher standards. The UK lags behind most European countries in terms of water quality: ranking 24th out of the 30 countries that designate and monitor Bathing Waters. The UK also compares poorly to other European countries in terms of the number and type of designated bathing waters with few inland waters and only one river to date. Italy has 73 rivers and 822 lakes designated, the Netherlands has 33 rivers and 668 lakes<sup>16</sup>.
38. The costs associated with the designation of Inland water bathing standards must be viewed holistically. The designation of Inland Bathing Waters on rivers has the potential to bring significant cost benefits to the nation and to regions through community enhanced health and wellbeing, improved quality of life and economic benefits through recreational tourism.
39. Furthermore, those locations designated as bathing water status (under the Bathing Water Regulations 2013) are the only places in the UK where open water bacteria levels that pose the greatest risk to paddlers' health, are monitored and the data published, this is essential to enable the protection of the public's health.
40. In 2020, the first river, the River Wharfe at Ilkley, was designated with Bathing Waters status. Currently there are no other designations on any of the UK's inland rivers, yet, rivers provide an invaluable recreational space for a huge proportion of the population, particularly those who live inland, with limited access to the coast. Statutory targets should be set for designating a minimum of two inland bathing waters, in each water company area for each year of any price review period and statutory targets for the number of watercourses with designated bathing water status classified as 'good' or 'excellent' adopted. .
41. Local stakeholders and communities have a vested interest in ensuring the water company and others are fully committed to the bathing water status and this would put pressure on water companies to prioritise reinvestment in infrastructure. Bathing water designation will incentivise achieving water quality standards, bringing cost benefits through community health and wellbeing, enhanced quality of life, and tourism<sup>17</sup>.

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<sup>15</sup> WWF, (2007), '[Flushed Away](#): 'How Sewage is still polluting the rivers of England and Wales'

<sup>16</sup> <https://www.outdoorswimmingsociety.com/designated-bathing-waters-explained/>

42. Where a designated Bathing Water receives a 'poor' classification 4 years running, it loses its designation; this could have a significant local economic impact and is a reputational risk for the water company.
  43. Guidance to Water Authorities must be amended to require them to facilitate capital expenditure on the improvement of water quality in inland bathing waters. With inland water recreation only likely to increase, it is essential for more rivers to be designated to help protect the health of the public and to drive investment for improving inland water quality.
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