

Written evidence from Swim England

About Swim England

Swim England is the recognised National Governing Body for swimming, diving, water polo and artistic swimming in England.

Before Covid, swimming remained one of the most popular activities in England, with 14 million adults going swimming each year (31.3 per cent of the population). More than one million children learn to swim outside of school through Swim England's Learn to Swim programme each year.

The popularity of open water swimming continues to grow. Sport England's Active Lives Survey showed that 2.1 million people swam in rivers, lochs, lakes and seas in 2017/18 and the number of people swimming outdoors continues to rise.

Swim England's recent 'Value of Swimming' report demonstrated that swimming is incredibly valuable. It is valuable for the individual and to local communities and wider society, saving the NHS more than £357 million each year.

Introduction

1. Swim England is pleased to provide evidence to the committee. The health of outdoor swimmers is being threatened by the levels of pollution in our rivers and waterways. Figures from the Environment Agency report that none of the country's rivers were in good overall health and only 14% met good ecological status.
2. The discharge of raw untreated sewage into rivers places swimmers at greater risk of the potential transmission of viruses.
3. Not only does poor water quality threaten the health of swimmers, it also damages our precious waterway environments. By improving water quality and encouraging people to be active in and on our rivers and waterways by increasing access to these spaces, people will be even more emotionally invested in protecting these environments.
4. Increases in the number of outdoor swimmers, as well as reported increases in membership numbers for other organisations such as British Canoeing and Angling, shows the desire of people to be active and utilise our rivers and waterways.
5. Swimming outdoors generates [more than double the happiness of swimming indoors](#). Compared to non-swimmers, open water swimmers say they feel 8.9% happier, while indoor swimmers feel 4.3% happier.

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

1.1 Indicators for improved water quality status should include:

- Increased number of waterbodies achieving good ecological status.
- Setting statutory targets for the reduction in the duration and frequency of discharges made from Combined Sewage Overflow's (CSO's) in all waters, with an end to untreated sewage discharge in all Bathing waters by 2030.
- Setting statutory targets for the designation of a minimum of two inland bathing waters, in each water company area, for each year of any price review period.
- Setting statutory targets for the number of watercourses with designated bathing water status classified as 'good' or 'excellent'.
- Reduction in physical indicators of outfall pollution (ragging, plastics, foaming, pathogens, foul smells, grit, etc.)
- Presence of emerging threats such as antibiotic resistant bacteria and emerging viruses.
- Indicators should be all year round not just during bathing season to reflect the recreational use of waterways.
- Legislation that holds the same standards for both inland and coastal waters.

1.2 It is important to have open and transparent reporting of the above indicators within the Annual Water Company Environmental Performance Report published by the Environment Agency.

Question 2: How could drainage and sewage management plans, introduced by the Environment Bill, play a role in reduced sewer discharges?

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

3.1 There has been some welcome recent progress with the recent announcement of the Storm Overflow Task Force Group's ambition to eliminate harm from storm overflows.

3.2 Swim England also welcomes the commitment from the water industry to increase transparency around storm overflows with the year round provision of real time data on sewage discharges into bathing water.

3.3 Despite this, CSO's continue to be both a public health and environmental issue and there is the need for the same monitoring and reporting of those discharges into our rivers, the majority of which do not have bathing water status. The failure to provide real-time, transparent information all year-round on our rivers is a risk to human health, with a huge number of water users not having access to the necessary information to allow them to stay safe.

3.4 Water pollution puts water users at risk of illness through exposure to harmful viruses and antimicrobial resistant bacteria, particularly swimmers who are immersed in the water. Given increasing numbers of people are using the rivers throughout the year, as well as growing recognition of the physical and mental health benefits of using the water, it is vital they are protected.

3.5 Swimmers wishing to swim in recreational zones that are not classified as designated 'bathing waters' are unable to make an informed decision on where to swim without improved data.

3.6 While some progress has been made to install Electronic Data Monitoring (EDM) systems on some CSO's, EDM's must be fitted on all CSO outlets by 2026. EDM data should be published on a quarterly basis to ensure transparency in performance of CSO assets. This should include the number, frequency, volume and flow for all coastal and river wastewater discharges.

3.7 Discharge information should also be made available all year round for waters classified as 'Bathing Water Status' which are currently coastal and lake locations.

3.8 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)). The very system which is meant to provide recreational users with information features an opt out clause for short term pollution events. These events are a threat to health and whilst such temporary pollution incidents are legally required to be notified to the public both online and on site, the provision creates a lack of transparency within the system. This must be addressed by reducing the discounted percentage allowance.

3.9 Technology should be installed by all water companies to continuously monitor all discharges of treated and untreated sewage from assets and the data published publicly with an enhanced real-time water quality testing regime. This will assist water users making informed decisions about their activity.

3.10 Regulatory Bodies such as the Environment Agency must be funded and resourced properly to enable them to conduct the required monitoring and enforcement. From 2013-2019, the number of water quality samples taken by the Environment Agency fell by 45%, with the number of sampling points falling nearly 40%. Between 2009-2019, Environment Agency funding fell 63%.

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?

4.1 Plastic pollution naturally negatively impacts on river water quality. Larger pieces can cause drainage issues and are a threat to wildlife. Micro-plastics and nano-plastics reduce water quality and pose public health concerns for water users as well as wildlife and the broader river ecosystem.

4.2 Swim England supports more research into the impact of micro-plastics in waterways and greater monitoring of their presence in our waterways.

4.3 Efforts should be made to reduce the amount of plastics in society, particularly the use of micro plastics in flushable products.

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

5.1 WWF's ['Flushed Away' report](#) highlighted that "The public want rivers safe to swim in and think regulators and companies should do more to tackle pollution" but revealed that "public awareness of these issues is low – half 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. Once informed, 80% think that it is never acceptable to release raw sewage into rivers, and 87% think the public must be told when this happens." Therefore action to raise awareness of the issue of water quality would be beneficial.

5.2 Proactive steps consumers can take to help improve the situation should be promoted, these should include:

- Keeping sewers flowing and our rivers and beaches clear of sanitary litter by not flushing inappropriate items.
- Saving water by using water wisely in the home and requesting a water meter (where appropriate).
- Avoiding too much paving in gardens and using permeable materials for any hard surfaces to ensure as much rainfall as possible soaks into the ground.
- Installing a water butt and disconnecting drain pipes from the sewer (e.g. into a soak-away instead)

5.3 By improving access to the UK's rivers, particularly for recreational activities, the Government can help facilitate an even greater bond between people and our rivers, making them more invested in their protection. Outdoor Swimmer's 2020 "Trends in Outdoor Swimming Report" to be released later this month will reveal that "swimming in natural waters changes how people feel about them" with the vast majority of outdoor swimmers stating that being an outdoor swimmer has made them more concerned about water pollution."

5.4 As well as encouraging changes to consumer behaviour, which may be a long term project, the government should lead the way through legislation, monitoring and enforcement to improve the quality of our rivers and waterways for the benefit of the economy, environment and all those who enjoy being active in or on the water.

Question 6: What is the required investment level needed to minimise storm overflows vs the scope for sustainable drainage and nature-based solutions?

Question 7: How effective are the planning policy and standards around sustainable drainage systems to reduce urban diffuse pollution in England?

Question 8: Should local authorities and highways agencies be given a duty to prevent pollution to watercourses without prior treatment?

Question 9: How effective is Ofwat's remit and regulation of water companies? Does it facilitate sufficient investment in improvements to water quality, including sustainable drainage systems and nature-based solutions such as constructed wetlands?

Question 10: Is adequate investment being made in adapting water treatment systems to future climate change?

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

11.1 It is clear that significant investment is going to be required to improve the quality of the water in our rivers to meet higher standards. Such investment would however be an important step in achieving the government's stated aims of enhancing "[people's engagement with the natural environment](#)."

11.2 The investment would also produce significant benefits, for instance in savings to the health and social care system. Swimming has been proven to save the NHS and social care system more than £357 million a year and outdoor swimming offers additional benefits beyond those achieved swimming indoors.

11.2 Within its 25 Year Plan for the Environment, the Government has committed itself 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, cannot be overlooked.

11.3 Areas afforded the designation of 'bathing water status' under the Bathing Water Regulations 2013 are the only places in the UK where open water bacteria levels are monitored and the data published. These bacteria pose the greatest risk to swimmers' health and therefore the designation is absolutely crucial in protecting public health and to help drive investment in improving water quality.

11.4 Designating inland bathing waters could help drive tourism to these areas, with the associated economic benefits for the local economy.

11.5 The recent designation of the River Wharfe at Ilkley, with water quality monitoring to begin in May 2021, is an exciting development and offers the opportunity to act as a catalyst for additional inland areas to be designated as a bathing water, helping many more people (particularly those who do not live near the coast) access the water.

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