

South West Water

Response to UKTAG draft recommendations: Phosphorus standards for rivers

Three consultation questions were given, with our proposed responses in red. We have added an additional comment to support the point about uncertainty in the models and the need for conclusive evidence to justify water company investment:

1. Should the recommended new default standards be adopted as the basis for assessing status, decisions on whether or not to allow new discharges and identifying the likely scale of improvements that may be needed at existing discharges? **Yes.**
2. Should adjusted standards be used to assess status and take decisions relating to discharge control? **Yes.**
3. Should default standards be adopted as the basis for assessing status and decisions relating to new discharges and adjusted standards used, where applicable, when planning improvements at existing discharges? **Yes, but the decision on requiring investment in point source phosphorus reduction should be measured against non-point source loads; in many cases it will be an unacceptable and wasteful use of resources to change a point source load, for example, where it may be just 8% in a catchment's total load, when no action is taken to address the other 92%.**

UKTAG explains in connection to these three consultation questions: 'because of the noise in the relationship between phosphorus and biological response, UKTAG continues to recommend that expensive action to reduce phosphorus concentrations at a site should be considered only where there is supporting evidence of adverse biological impacts'. **South West Water agrees with this reservation to avoid unjustified expenditure. Our view is that a whole catchment view must be taken, informed by thorough, effective and conclusive scientific investigations, to ensure that resources are invested first in options which will resolve the cause of the most significant problems.**

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