Thank you for the invitation to comment on the committee’s report into CSOs, particularly recommendations 3, 4 and 5. We are also grateful for the opportunity to have given evidence to the inquiry itself.

We welcome the committee’s report and, in principle, support recommendations 3, 4 and 5. Good data and transparency are the foundations for ongoing improvements.

Our one caveat is that any future regulations should include appropriate flexibility. Affordable real-time monitoring systems depend on telephone signals and other supporting infrastructure. A ‘comply or explain’ provision in any future regulations could provide the appropriate short term flexibility needed.

Our broader point is that the focus on public policy should be on removing harm to rivers, for which Reasons for not achieving Good status (RNAGS) is a proxy. Focussing primarily on inputs could lead to inefficiencies and the undermining of broader environmental goals.

NRW data shows that in the area of Wales HD serves we are responsible for up to seven percent of RNAGS. Agriculture is responsible for 27 percent and mining for 25 percent. With the investments we’re already making, we expect our share of the problem to be down to 3.5 percent by 2025. We are developing plans to take this to zero.

With best wishes

James Jesic