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Janez Potocnik
Environment Commissioner
The European Commission
ENV-DRINKING-WATER@ec.europa.eu

10 October 2014

Dear Mr Potocnik

Consultation on EU drinking water policy

Citizens Advice Scotland (“CAS”), its 61 member bureaux, consumer helpline and Extra Help Unit form Scotland’s largest independent advice network. Citizens Advice Bureaux (“CAB”) advice services are delivered using over 250 service points throughout Scotland, from the islands to city centres, and through our helplines. Together, the Citizens Advice Service in Scotland helped 300,000 people with nearly 1 million issues in 2013/14.

On 1 April 2014, the roles and responsibilities of Consumer Futures were transferred by the UK Government to the Citizens Advice Service, encompassing CAS and our sister organisation Citizens Advice (England and Wales). CAS now represents the interests of citizens and consumers in essential regulated markets including energy, post and, in Scotland, water. Our aim within the water industry is to challenge and shape policy to ensure it reflects the needs of consumers. CAS, therefore, welcomes the opportunity to respond to the consultation on EU drinking water policy.

We take the view that this consultation will potentially provide the EU with a more informed understanding of citizens’ and stakeholders’ views on the need for, and type of, action including legislation, that they believe will help to improve the supply of safe, high quality drinking water across the EU.

CAS further welcome the fact that the consultation is in response to the EU’s



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European Citizens' Initiative "Right2Water", and that this first ever, successful participatory democracy instrument at EU level focuses on improving the supply of safe, good quality drinking water across the EU.

CAS generally welcomes the EU's commitment to increase the supply of safe, good quality drinking water across the EU, and its actions and initiatives in this area. We also welcome the fact that the EU's action to promote safer, better, and more accessible, water is based on quality, physical accessibility and affordability, an approach which CAS supports.

We recently, for example, responded to the Scottish Government's consultation on the Principles of Charging for water and sewerage charges. In our response CAS stated that the Scottish Government should explicitly include 'affordability' as a specific principle of charging within its Principles of Charging rather than just referring to 'affordability' in the general introduction to the Principles of Charging. CAS believes this would help to strengthen the commitment to work towards water and sewerage charges that are affordable for all consumers, rather than attempting to define affordability through broad based principles that do not necessarily support all households. We also highlighted that this would be consistent with EU policy, which is based on the principle that the affordability of water services is critical.

CAS notes that the European Commission has three months to respond to the consultation. We believe the European Commission should accept Right2Water's recommendation that the Commission: *"propose legislation implementing the human right to water and sanitation, as recognized by the United Nations, and promoting the provision of water and sanitation as essential public services for all"*.

CAS considers that the EU's commitment to reinforce implementation of its water quality legislation, and to advocate for prioritising universal access to safe drinking water and sanitation in future Sustainable Development Goals, can make an important contribution to improving the supply of safe, high quality drinking water across the EU. We also believe that the EU's proposed action to improve urban waste water and drinking water data management, to explore benchmarking for water quality and water services, to hold EU-wide, public consultations on the Water Quality Directive, to improve transparency in the water industry, and to stimulate innovative approaches for development assistance can make significant contributions in this key area.

Further areas which CAS believes the EU should consider, in the context of potential action to improve access to safe, high quality drinking water, include the quality of drinking water provided by private water supplies, and the security of such supplies. We also believe that, in terms of consumer information, it is important that the information provided is accessible and easy to understand. CAS also considers that careful thought must be given to the mechanisms and

media for providing such information, given that not everyone will have access to digital media and communications.

CAS would be grateful if you could please send us details of any future consultations relating to the water industry, including the forthcoming stakeholder dialogue focusing on transparency in the water sector.

Yours sincerely

Sarah Beattie-Smith
Consumer Futures Scotland Manager