



**Scottish Association
of Citizens Advice Bureaux**

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25 September 2014

Dear Bob

Draft Principles of Charging

Many thanks for your letter to Margaret Lynch, CAS's Chief Executive dated 9 September 2014.

CAS, its 61 member bureaux, consumer helpline and Extra Help Unit form Scotland's largest independent advice network. 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 1st April 2014, the roles and responsibilities of Consumer Futures were transferred 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, as part of our new role as a statutory consultee and consumer representative organisation, to this consultation on the draft Principles of Charging

CAS is strongly of the view that the inclusion of 'affordability' within the Principles of Charging would provide a commitment to work towards water and sewerage charges that are affordable for all consumers. Against this background, CAS would view it as critical that affordability remains a Principle of Charging, and that this is explicitly referenced in the Principles of Charging document.



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Dominic Notarangelo



The Scottish Association of Citizens Advice Bureaux – Citizens Advice Scotland
(Scottish charity number SC016637)

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Including affordability as a distinct principle within the Principles of Charging would also remain consistent with the *European Commission ‘Communication from the Commission on the European Citizens’ Initiative ‘Water and sanitation are a human right! Water is a public good, not a commodity!’* which states ‘EU policy is based on the principle that affordability of water services is critical.’

We note that you would like comments on the 2015-21 Directions and we will write to you under separate cover.

Yours sincerely

Sarah Beattie-Smith
Consumer Futures Scotland Manager



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6 October 2014

Dear Bob

The Scottish Water (Objectives: 2015-21) Directions 2014

Many thanks for your letter to Margaret Lynch, CAS's Chief Executive dated 9 September 2014.

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CAS welcomes the commitment to support improvements in Scotland's rural water and sewerage provision. As a member of the rural provision sub group along with representatives from key industry organisations we welcome Scottish Water's ongoing involvement in this area, sharing its knowledge and expertise. In particular we welcome a commitment to engaging further with consumers to ascertain the degree to which they wish to be connected to public supplies.



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We welcome the commitment to improve health aspects of Scotland's drinking water by seeking ways to reduce and / or eliminate lead in water. CAS is, along with other key industry stakeholders, keen to support the development of a strategy that will support this objective, as part of the Lead in Water Action Group.

We note the commitment in section 11 (2)(a) '*assess flood risk from sewerage systems and update the latest assessment as required*' and would welcome further discussion with the Scottish Government on the degree to which this will address long standing issues associated with external sewerage flooding, for which there has been no previous funding provision.

I would be very grateful if you could please send future copies of Scottish Government consultations to me as well as to Margaret Lynch.

Yours sincerely

Sarah Beattie-Smith
Consumer Futures Scotland Manager