

Waterwise response to

Defra stakeholder review on proposed 'Government Buying Standards'  
specifications for water using products

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Stakeholder Review Response Form

PART ONE – About you

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Confidentiality: If you would like your response or personal details to be treated confidentially, please explain why:

PART TWO – Your comments

1. Do you think the proposed specifications are:

- sufficiently ambitious?
- too ambitious?
- not ambitious enough?

*Please justify your answer:*

Waterwise wholeheartedly endorses the move to mandatory standards for water-using products for government procurement, which we have been advocating for some time. The proposals represent positive change and should help drive both water-efficient procurement and market transformation.

Water efficiency can help cut the deficit and contribute to the Coalition Government's spending cuts. In July, the (soon-to-be-abolished) Sustainable Development Commission published their annual update of government progress in meeting its SOGE (Sustainable Operations on the Government Estate) targets – this report covered 2006 to 2009, and sets out measures for the future. It calculated that government has saved £25.5m in water bills through water efficiency measures between 2006 and 2009, including £13m in 2008 – 2009. It also suggested that a £3m SALIX (spend-to-save) fund for the public sector would yield 20% cuts in water savings and payback within 1 year, and that a

further 10% reduction in water use would yield a further annual £5m in savings. Because any savings would be year-on-year, the earlier they can be achieved, the earlier savings can start to be made.

Water-efficient procurement by government will also help drive the market – increasing the uptake of water-efficient products in existing homes.

Waterwise agrees with the analysis of “principal-agent failure”, or counter-incentives of procurement policy-owners and enforcers. Waterwise welcomed the move to put procurement indicators into the objectives of Permanent Secretaries, but mandatory standards will help drive effective enforcement yet further.

However, Waterwise would like the Best Practice levels to be included as mandatory, rather than the average. This would ensure greater bill savings and carbon and water savings within government, and maximising the market transformation.

2. Do you believe the market for water-using products has the capacity to adjust to the proposed changes? Please make reference to specific aspects such as flowrates for taps and showers, litre use for toilets, waterless urinals, etc. in your response.

Yes  No

*Please elaborate:*

Many of the products named in the document are already being produced in the mass market at the flow rates and capacities described. Most non-domestic showers are now produced with a maximum flow rate of 9l per minute and the majority of toilets being produced currently with a dual flush effective volume of 4.5l – however, Waterwise research and experience suggests that siphon-flush cisterns (single flush) are less likely to reach this low volume. There are a number of models on the market that will meet these criteria and others would be likely to follow suit. Waterwise would advise that waterless urinals aren't used where there are a high volume of users as they can in this context cause issues with the plumbing and surrounding environment.

All other items listed are currently being produced on the market at the levels described by a number of manufacturers; there would be no issue in the market transforming to meet the changes described.

3. Are there any other technological trends or factors that should be taken into account when revising specifications for this product group, both now or in the future e.g. specific planned legislation; anticipated changes in consumer demand such as product eco-design and durability; anticipated supply constraints such as material shortages / production cost increases; expected change in market competition?

Yes  No

*If 'yes', please elaborate:*

4. We would like to gather your views on the proposed option of introducing new mandatory Government Buying Standards specifications (as described in Option 2), which are more detailed than the existing Green Public Procurement criteria particularly for taps and showers. These specifications have been developed using existing national criteria and are relevant to new water using products used in either new build or refurbishment projects. In particular, we are keen to hear your views on:
- a. What are the issues around making these criteria mandatory specifications?

Waterwise wholeheartedly endorses the move to mandatory standards for water-using products for government procurement, which we have been advocating for some time. The proposals represent positive change and should help drive both water-efficient procurement and market transformation.

In addition to the arguments for mandating water efficiency in government procurement standards which are set out in the consultation document - of saving money on government water and energy bills and in the context of water-stressed areas – this move will help drive the market in water-efficient products and increase the water efficiency of existing homes, as well as link with other moves welcomed by stakeholders and set out in the Walker Report on Charging for Household Water and Sewerage (December 2009), for example on a single water-efficiency label. There are also drivers for water efficiency beyond water-stressed areas – many areas not currently defined as water-stressed do have levels of abstraction which are classified by the Environment Agency as damaging, for example, and even areas in the UK not traditionally seen as water-stressed (such as the North West of England, and Dmfries and Galloway), have suffered water shortages in recent months.

- b. Which of the two options (1 or 2) is the most likely to work and why?

On the basis of the limited detail on the two options set out in the document, Waterwise would favour the second, as the first would not be specific enough on flow rates, and therefore would not deliver water savings effectively.

*Please elaborate with reference to the letters above:*

5. Do you have any information you can provide that can help illustrate the potential financial impact of these proposals on suppliers or procurers set out in section 10 of the Impact Assessment?
- How will proposals affect the relative price of products? If so, by how much (for example 1-2%, 3-5%, 5%-10%, etc)?
  - If you are a supplier, will you incur significant costs that you will be unable to pass on to the consumer / supply chain as a result of these proposals?
  - How will small to medium sized enterprises in the sector be affected?

*Please describe your evidence with reference to the points highlighted and any assumptions or sources used:*

6. Are the Government standards presented in a clear and accessible way in this review and Annexes?

Yes  No

*If 'no', please explain why:*

The information on the two options could have usefully been more detailed.

7. Please detail below any further comments you may have in relation to the proposed specifications for water-using products.

Waterwise would like the Best Practice levels to be included as mandatory, rather than the average. This would ensure greater bill savings and carbon and water savings within government, and maximising the market transformation.