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Keith Hunt,  
Water Regulations Directorate,  
Northern Ireland Authority for Utility Regulations,  
Queens House,  
14 Queen Street,  
Belfast, BT1 6ED

November 2009

Dear Mr Hunt,

**Water and Sewerage Service Price Control 2010-2013- Draft determination summary report**

The Ulster Farmers' Union, with c. 12 500 members, represents a major component of the Rural Community in Northern Ireland; therefore we feel it is highly appropriate that we respond to this document. We trust that the comments listed below will be taken into consideration.

The Ulster Farmers' Union feel PC10 is focused at improving efficiencies for domestic customers and reflects little on improving services to business customers, who are helping to finance NIW. We do agree with the suggestion that all non-domestic customers will hopefully see reduced tariffs over the PC10 period. We feel certain, current charges are unjustifiable- standing charges on unused connections and increase in cost of getting a new water connection so we would question if this is value for money.

We welcome reducing incidents of interruption to supply as a priority. This has always been a concern for the UFU, particularly as this could jeopardise animal welfare and cause serious operational problems. It would be useful to invest in systems that would provide back-up supplies to those affected, particularly businesses.

The UFU would also welcome the priority to reduce water pollution incidents. However we would highlight that previous key performance indicators set in relation to this issue, have not been achieved.

During the past decade, huge investments have been made on farms, to improve efficiencies and environmental standards, particularly in terms of water quality. This has been necessary to comply with various legislation such as the Water Framework Directive (WFD) and Nitrates Directive.

The UFU welcome the priority to reduce risk of pollution from unsatisfactory discharges from sewerage networks. However, we consider all sewerage discharge to be unsatisfactory. We feel the current water and sewerage infrastructure in NI is not robust enough to cope with demand, as illustrated by various recent incidents, resulting from system failures during episodes of high rainfall. In most cases NI farmers have invested in systems that far exceed compliance with that required from Europe, as part of the WFD. Therefore we feel that NIW should not just be seeking to improve quality of sewerage discharges 'in line with European requirements' but should be seeking to exceed requirements. The UFU would also question if 'openly monitoring and reporting' of sewer flooding and pollutions incidents would significantly reduce them. If the systems are already increasingly stretched during periods of heavy rain, how would monitoring prevent this occurring again?

We continue to stress that without universal metering of supplies, where every household is charged in relation to the actual amount consumed, there is no encouragement for the responsible use of water. Universal metering would ultimately encourage water efficiency and preservation, indirectly reducing costs associated with water demand, treatment and infrastructure.

NIW should consider offering best practise advice on efficient water use to domestic customers. A considerable amount can be learnt from business customers who have implemented systems to conserve water use.

The UFU would also add the sustainable use of water bodies will only happen if apparent unsustainable practices are seriously tackled. More serious investment needs to be made in tackling leakage, its fast detection and repair.

If you require any clarification on any points raised please do not hesitate to get in touch.

Yours Sincerely



Gregg Shannon

UFU Legislation Committee Chairman