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Summary of responses to the consultation on implementing the abstraction elements of the Water Act 2003 - 29 April 2009 to 22 July 2009

Removal and creation of various exemptions from licence control

October 2009



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



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Introduction

Purpose of consultation

On 29 April 2009, Defra and the Welsh Assembly Government jointly published the paper 'Consultation on implementing the abstraction elements of the Water Act 2003'. The full text of the consultation is available at: <http://www.defra.gov.uk/corporate/consult/water-act/index.htm>.

The consultation document set out the views of the UK Government and the Welsh Assembly Government. The views in the consultation were shared and each Government is referred to in this paper as 'the Government'. The relevant regulation and order-making provisions of the Water Resources Act 1991 and the Water Act 2003 ("the 2003 Act") are devolved to Ministers of the Welsh Assembly Government. All references to the Secretary of State in this consultation paper include references to the Welsh Ministers unless otherwise stated. All references to the Agency are to the Environment Agency including the Environment Agency Wales.

The consultation sought views on our proposals in two main areas.

- The transitional provisions that we proposed to apply to the removal of various exemptions from abstraction licence control. (The exemptions were related to purposes of the abstraction, the areas in which the abstraction was undertaken or the status of the abstractor.) Also, the provisions relating to the payment of compensation that may arise from these changes.
- The creation of new exemptions that leave some abstractions outside licence control that would otherwise be brought into the system when we implement the remaining provisions of the 2003 Act.

Parliament approved the changes proposed in the transitional provisions through the 2003 Act, although they have not yet been brought into effect. To implement these changes it would be necessary to make appropriate regulations ('transitional regulations') governing the making and determination of applications for licences in order to bring existing lawful abstractions under licence control. Provisions of the 2003 Act to which the transitional regulations would apply are:

- Section 5 Rights of navigation, harbour and conservancy authorities;
- Section 7 Rights to abstract for drainage purposes;
- Section 10 Removal of exempt area status under section 33 of the Water Resources Act 1991;
- Section 32 Visiting forces; and
- Section 73 Border Rivers.

It was also proposed to provide for some further exemptions from the licensing restrictions under section 33A of the Water Resources Act 1991, inserted by the 2003 Act. In most cases, these exemptions either consolidate existing exemptions or modify and refine exemptions for certain abstractions

that would otherwise be ended by the provisions of the 2003 Act. Exemptions were only proposed, modified or retained where the category of abstraction has no appreciable impact on the environment and regulatory control is unnecessary for the management of water resources as follows:

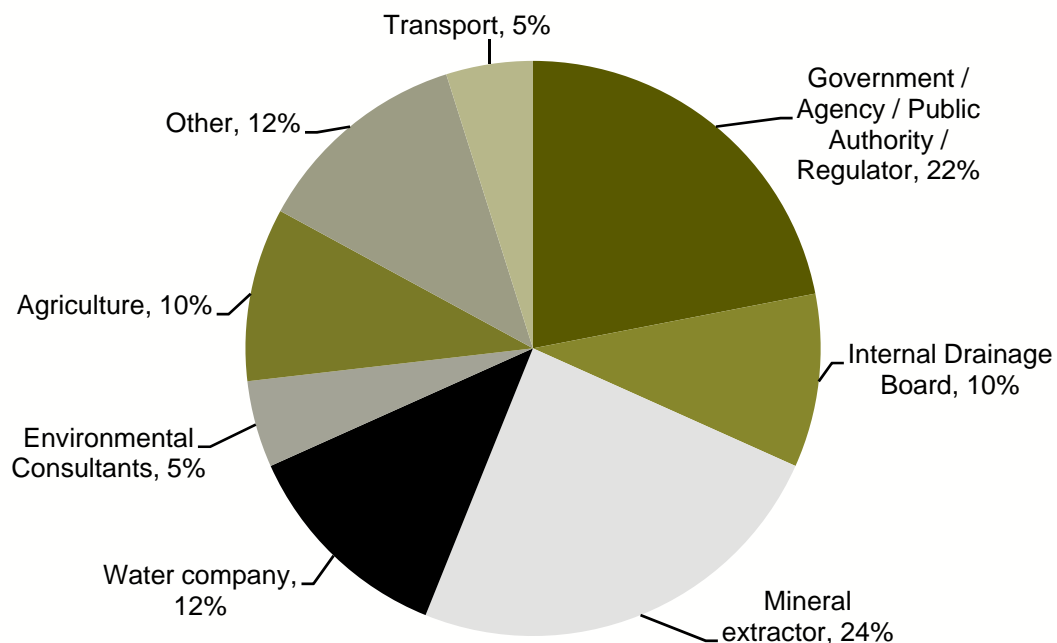
- certain abstractions by ports and harbours;
- certain dredging operations;
- certain abstractions and new impounding works within a water meadow;
- new impounding works constructed by or on behalf of an Internal Drainage Board; and
- saline abstractions from the Cheshire Brinefields.

Consultation period and distribution

The consultation ran for 12 weeks from 29 April to 22 July 2009 and was distributed to the list published at: <http://www.defra.gov.uk/corporate/consult/water-act/consult-list.htm>. It was published on Defra's and the Welsh Assembly Government's websites and publicised in press notices.

Responses

41 responses were received to the consultation from a wide range of sectors as set out below. This included several responses that arrived within a reasonable time after the deadline for responses. A full list of respondents is included in Annex A. Most questions received a low response rate, which is thought to be due to the sector-specific nature of most of the questions i.e. most questions were not relevant to all sectors.



Overview

All responses were considered in this summary and the majority of those who responded to the proposals in the consultation agreed with most of them.

A common concern raised by respondents to the consultation was the implementation timetable and the resource commitment that this would require. Specific concerns were raised about the new regulations being implemented on the proposed start date of the 1 October 2009 and the proposed one year period to submit a licence application to the Environment Agency.

A more general issue raised was the need for more communication to give greater clarity or guidance on what was required by respondents to comply with the arrangements for both the transitional provisions and the further exemptions.

A number of respondents suggested ways to amend the exemptions. This summary indicates the areas in which the suggestions relate, but does not describe each suggestion in full.

Similarly, there were a number of respondents who sought more clarity on specific examples on how the transitional arrangements would apply to specific projects or areas of work. This summary indicates the areas where clarity or guidance was requested, but does not refer to each example.

Summaries are given below of the responses to each question, along with the background information to each question, as set out in the consultation. These indicate the level of agreement and disagreement and the key points that arose. Where a respondent did not specify that a point related to a specific question, it has been allocated to the most appropriate question.

Responses to individual questions

Question 1

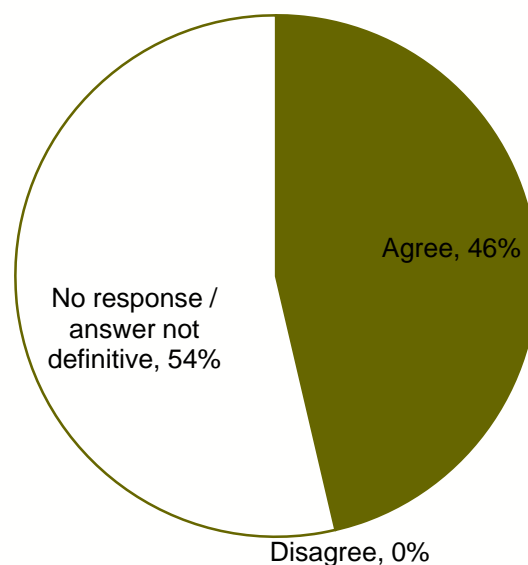
The Agency, as the statutory body responsible for the management of water resources, is best placed to advise and may sometimes need to decide, which type of licence or number of licences an applicant should apply for. When it does so, it will advise an applicant that it proposes to treat an application for a licence as being one of a different type to that sought before it proceeds to determine the application or publish the proposal. In normal situations, the Agency would encourage applicants to discuss their proposal with them before making an application. The large number of applications expected under the transitional provisions may make this impractical.

Where there is a dispute about what type or number of abstraction licences an applicant should apply for, the applicant has a right of appeal to the Secretary of State against the Agency's decision. The time limit for bringing an appeal is 28 days.

In addition to changing the type or number of applications made by the applicant, we also proposed that the Agency should be able to treat an application as a variation of an existing licence where it was appropriate to do so. This would apply where it was clear that the proposal relates to a series of abstractions made periodically from the same source of supply for which a licence was already held by the same person making an application under the transitional provisions for an abstraction that was currently exempt.

Q1 Subject to a right of appeal, should the Agency be able to change the type or number of licences applied for or treat an application as a variation of an existing licence?

There were 21 responses to this question:



A high proportion of respondents to Question 1 agreed that the Agency should be able to change the type or number of licences applied for or treat an application as a variation of an existing licence issues.

A number of comments were made about clarifying the way the Agency would manage this decision process and how the Agency would involve an abstractor in application discussions so that there was transparency in the Agency's decision.

Respondents asked for greater information, clarity and guidance on the type of licences to apply for and the timing of an application.

Some respondents commented that they felt the duration of the appeal process (28 days) against the Agency's decision on the type of licence required was too short.

Also, in response to this question, but not directly related to it, some respondents raised concerns that a transfer licence would not carry the same protected rights as a full abstraction licence.

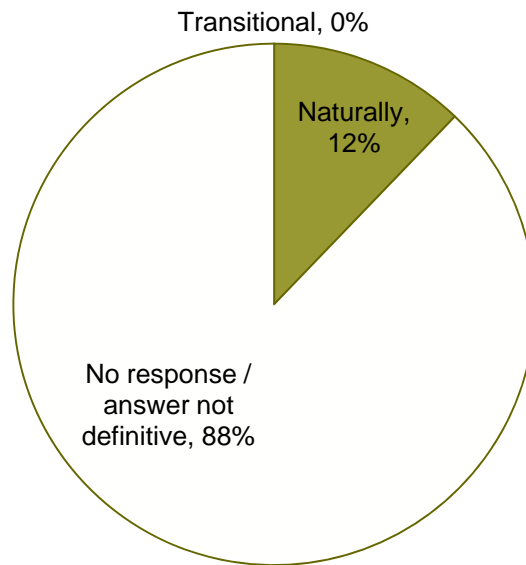
Question 2

Currently, the Agency has no water resources management functions in relation to certain rivers close to the border with Scotland. Section 73 of the 2003 Act would extend the Agency's functions to those rivers. The effect of this change was that abstraction licences would be needed on the English side of the River Tweed, which, because of its definition, included the River Till, and the Rivers Esk and Sark and certain tributaries of theirs. These rivers are referred to as "the Border Rivers". Licences would be needed where abstraction exceeds 20m³ a day, the standard threshold for licence control.

In the absence of any licensing functions being exercised by the Agency in relation to abstractions from the Border Rivers, Natural England had consented certain abstraction projects in these areas under section 28 of the Wildlife and Countryside Act 1981, amended by schedule 9 to the Countryside and Rights of Way Act 2000. These consents mainly affected irrigation schemes and were primarily concerned with the assessment of environmental effects of these operations rather than the management of water resources. Where an abstraction was made from these rivers that exceeds the standard threshold of 20m³ a day, a licence under the Water Resources Act 1991 would be required regardless of whether a consent has been separately given by Natural England. There would be no need for these Natural England consents to continue once normal licence controls were extended to the Border Rivers.

<p>Q2 Should any special transitional provisions be made to deal with these existing consents or should they expire naturally at the end of their time limit?</p>

There were 8 responses to this question:



There was relatively low response to Question 2, possibly because of the specific locality of the question. The responses received supported the option that existing consents should expire naturally.

Respondents raised some qualifications to this option:

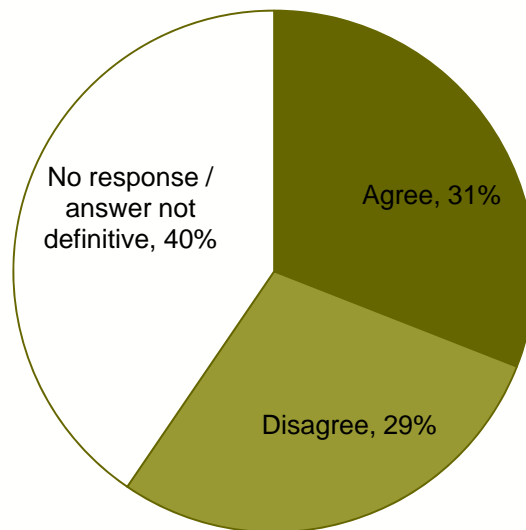
- that there should be suitable conservation screening in place when assessing all new licence applications, to ensure impacts on designated sites including Natura 2000, SSSIs and biodiversity were taken into account before the consents expire; and
- that the Agency should undertake a communication programme in the area affected so that those affected were aware of the removal of the exemption.

Question 3

To be eligible to apply for a licence under the transitional provisions we proposed that applicants for these previously exempt activities must be able to demonstrate that they had actually abstracted water from a source of supply at any time within a period of 4 years preceding the commencement of the removal of exemptions. The proposed period of 4 years was similar to previous transitional provisions under the Water Resources Act 1963 and the Water Act 1989 and was consistent with other provisions of the licensing system.

Q3 Do you agree that 4 years is a reasonable qualifying period? If not, what do you suggest as an alternative and why?

There were 24 responses to this question:



Responses to Question 3 show an almost equal split in opinion on whether 4 years was a reasonable period to qualify for the transitional arrangements with very marginally more support for the 4 year qualifying period. A variety of suggestions were made to vary the 4 year period or exempt certain abstractions from the qualifying period.

In summary, the key issues raised in the responses concerning the 4 year qualifying period were:

- that there were instances where water had not been abstracted within the last 4 years but for which there remained a need for future abstractions and hence a licence, but which would be ineligible under the transitional arrangements. Some respondents mentioned that abstracting water just to qualify would be wasteful;
- a need for clarity on the type of evidence required by the Agency to prove an abstraction had taken place within the 4 year period and the volumes of water abstracted, as it this was quite often difficult to estimate. Suggestions of evidence that should be accepted included intended abstraction plans or 3rd party evidence; and
- the need for clarity as to what would happen where an abstraction started after the qualifying period ended but before the close of the application period.

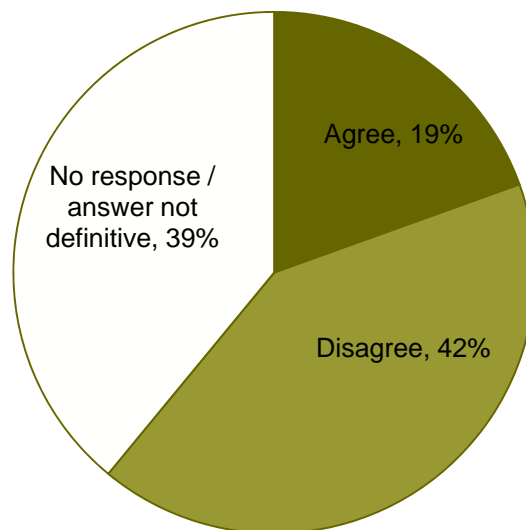
Question 4

The UK Government indicated in *Taking Water Responsibly*, that applicants for licences for abstractions that were previously outside licence control would have a period of two years in which to apply. However, given the delays to the ending of exemptions and the additional time that affected abstractors had to prepare for this change, it was proposed that the application period be one year, rather than two. The one year period would start from the

commencement date of the relevant provisions of the 2003 Act. The Welsh Assembly Government supported this proposal.

Q4 Do you think a one year application period provides abstractors of newly licensable abstractions with sufficient time to submit their applications?

There were 28 responses to this question:



There was a comparatively large response to this question with the majority not in favour of a one year application period. A number of reasons were suggested for the application period being too short, including:

- an applicant may have had too many or complex abstractions to be able to complete applications in time;
- this allowed insufficient time to plan resources and financial budgets may not be available within this short timeframe.

Where responses suggested a different application period, many preferred a return to the original two year period proposed in “Taking Water Responsibly” with others preferring to stagger the application period.

Although not directly related to this question, some responses requested a greater clarity on the types of information required for a valid application and whether information could be provided at a later date, where requested by the Agency. It was also suggested that regulations should require the Agency to acknowledge valid applications.

Question 5

Annual charges would apply to any full licence under the transitional provisions from the date on which it is granted. Annual charges for full licences may vary from time to time and a new scheme may be made after a period of public consultation and approval by the Secretary of State in consultation with Welsh Ministers and with the consent of the Treasury. These charges were made to cover the cost of the Agency's functions to manage water resources and to administer the licensing system including the protection of all full licences that it grants. Annual charges were not made for transfer licences, temporary licences or licences to impound water. The annual charges, which the Agency made, were only designed to recover its costs; there was no element of profit.

Q5 Once a currently exempt abstraction becomes licensable under the 2003 Act and if a full licence is granted, it will be subject to annual charges. Do you have any comments about this or any of the other charges that will be payable for an application under the transitional provisions?

NB – This is an open question, so it has not been possible to summarise the responses by way of a pie chart.

The responses to this question generally accepted that the Agency's abstraction charges should recover the cost of carrying out its duty to manage water resources, as long as the charges were administered transparently and the Agency consulted with abstractors on the charging scheme.

A number of responders raised issues about clarity and guidance on how, or if, charges would be applied for particular types of abstraction. Some responses made suggestions on the scope for reducing or eliminating charges, especially the advertising charge.

It was also suggested that the costs in the consultation's impact assessment, in cases where more environmental assessment was required, did not reflect actual anticipated costs or data on the number of new abstraction licences needed.

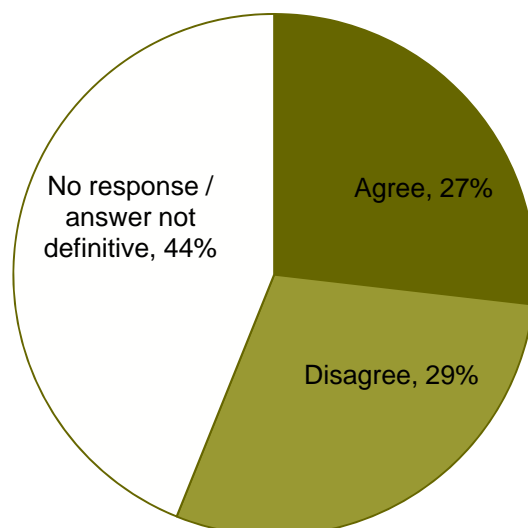
Question 6

The consultation proposed that the Agency must determine all applications after 5 years from the end of the application period. It provided the Agency with enough time to manage the high volume of applications from newly licensable abstractions. We would expect the Agency to prioritise the determination of applications according to the impact of abstraction. To ensure fair assessment of all applications, we no longer proposed that applications for trickle irrigation be determined earlier than those in other groups or categories.

Q6 Do you consider a period of up to 5 years from the end of the application period to be a reasonable time for the Agency to reach a decision on all applications? Should the time for determining a

licence application be shorter or longer?

There were 23 responses to this question:



Respondents were split on agreeing whether the Agency should have a 5 year period to determine applications, with a slight majority saying that the period should be shorter.

Several respondents suggested reducing the period the Agency had to determine applications to 4 years and extending the application period to two years, thereby retaining the overall 6 year period as proposed.

A common reason respondents suggested for reducing the 5 year determination period was the difficulties this could cause to planning because the uncertainty over such a determination period would affect investment. Other respondents wanted the period of determination reduced, or at least not extended, to limit the period in which environmental damage might occur.

Respondents also requested greater clarity about the Agency's determinations process and how it would be managed, for example, whether the Agency would screen then prioritise licence applications and the way in which environmental risk would be factored in.

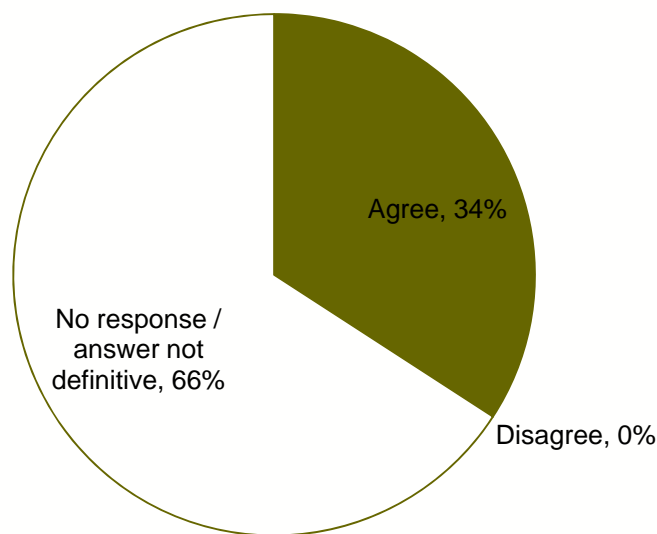
Question 7

Section 33 of the Water Resources Act 1991, which allowed any relevant authorities responsible for administering the licensing system to apply to the Secretary of State to issue an Order for the restrictions on abstractions not to apply, was repealed under subsection 11 of section 10 of the 2003 Act. Despite this repeal, any Order which was in force immediately before the repeal would remain in force until revoked under powers in section 10 of the

2003 Act. A list of the Orders and other similar exemptions currently in force was provided with the consultation. We proposed that when these Orders were revoked then the normal licensing threshold of 20m³ a day would apply in those areas. Those currently abstracting more than this amount would need to apply for an abstraction licence under the transitional provisions.

Q7 Do you agree with the proposal to apply the normal threshold in areas previously exempt from licence control in line with the rest of England and Wales?

There were 14 responses to this question:



All who responded to this question agreed that the normal threshold in England and Wales (20m³ per day) should apply in the areas affected when the Orders were revoked. Respondents also mentioned that the Agency should have a process available to modify this threshold where it was appropriate in the future.

A response, similar to Question 2 on Border Rivers, was that it was important that the Agency should have effective communications with those likely to be affected by the proposals.

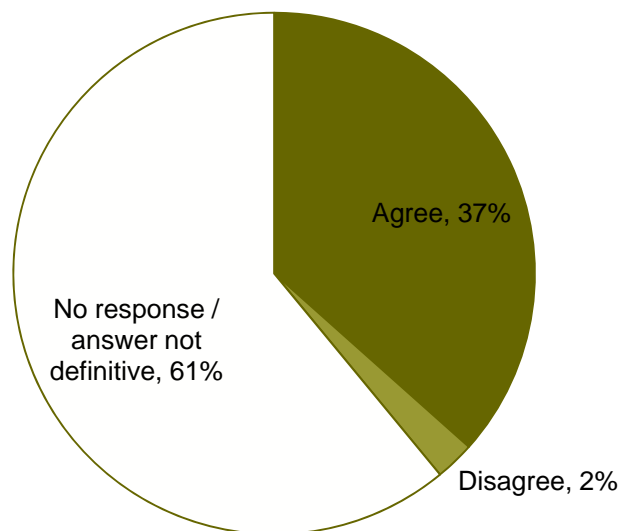
Question 8

Under section 103(3) of the 2003 Act, the Secretary of State could make regulations to provide for the Agency to pay compensation to a previously exempt abstractor who, as a consequence of requiring a licence, suffered any loss or damage should a licence to continue an abstraction be refused or where a licence permitted a more limited abstraction than before. There were also powers in section 10 to provide for compensation to be payable when section 33 Orders were revoked.

To claim compensation, the applicant for the licence must appeal against the Agency's decision, using the normal procedure for appeal in section 43 of the Water Resources Act 1991. Where the appeal was dismissed, and the Agency's decision stood, then the applicant would be entitled to make a claim. We proposed that the deadline for claims in this category should be within 6 years of the determination of an appeal by the Secretary of State or by 1 October 2024, whichever was earlier.

Q8 Do you agree that a period of 6 years following an appeal decision is a reasonable period of time in which to make a claim for compensation?

There were 17 responses to this question:



Most respondents agreed that 6 years after a licence appeal decision was a suitable period for claims of compensation. However, some respondents queried a need for a cut off date to make a compensation claim. They considered the time taken to determine a licence appeal could potentially take many years and that this could take them beyond the 1 October 2024 cut off date.

Question 9

The powers under section 103(4) of the 2003 Act also allow for regulations to provide for the payment of compensation in certain other circumstances. For these provisions to take effect the applicant would need:

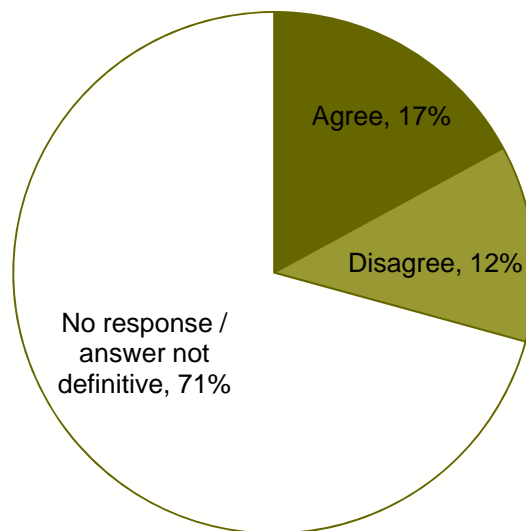
- to demonstrate, to the Agency's satisfaction that they had planned future abstraction before a licence became necessary; and
- to have had their application made under the Water Resources (Abstraction and Impounding) Regulations 2006 (SI 2006/641) or any replacement

regulations declined or curtailed and any appeal against the Agency's decision dismissed.

We proposed that all claims in this category should be made by no later than 1 October 2024. This would give those with long term plans a period of at least 10 years to a convert their plan into a formal application for a licence.

Q9 Do you agree that at least 10 years is a reasonable period of time to convert a plan into an application and then, following an appeal decision, make a claim in this category? Should this period be shorter or longer?

There were 12 responses to this question:



There was a mixture of reaction in the responses to Question 9, with a majority considering that the 10 year period was suitable.

Those in certain sectors, especially mineral extractors, suggested that it was not suitable to have this cut off period, as quite often there were plans to extract minerals for many years. There was often only a need to abstract water late on in the life of a project, such that the cut off date to claim compensation may have passed before the need to abstract water.

Respondents also suggested that, similar to responses to Question 8, the appeal process could cause abstractors to miss the compensation cut off date.

Question 10

We proposed that the Agency would not be liable to pay compensation where the applicant under the transitional provisions was a public authority. As a general principle, public authorities should not expect to seek recompense or

claim compensation from other publicly funded authorities in the proper exercise of their statutory functions.

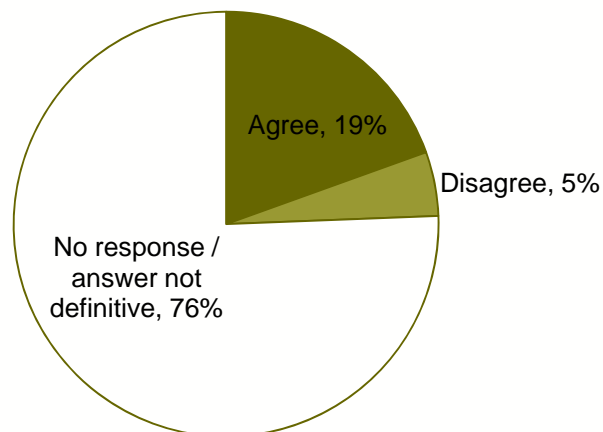
We also proposed that no compensation would be payable where the Secretary of State was of the opinion that the abstraction causes serious damage to any waters, channels or underground strata, or any flora and fauna dependent on them. This exclusion matched the effect of section 27 of the 2003 Act; it would be perverse to compensate one set of abstractors whose abstractions were causing serious damage but not another.

Q10 Do you think it is reasonable that no compensation be paid to abstractors who are public authorities or where the abstraction is causing serious damage to the environment?

This question has been split into two for summary purposes as follows.

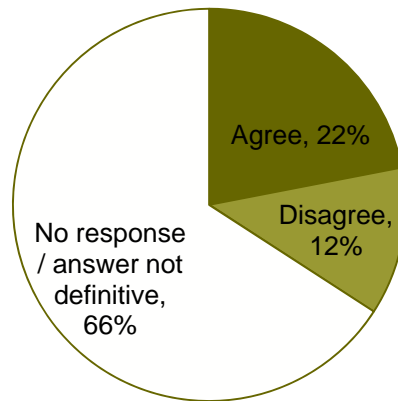
Q10a. Do you think it is reasonable that no compensation be paid to abstractors who are public authorities?

There were 18 responses to this part question:



Q10b. Do you think it is reasonable that no compensation be paid to abstractors where the abstraction is causing serious damage to the environment?

There were 18 responses to this part question:



Most respondents agreed that public authorities should not be compensated. There was some query as to the point of the licensing process at which the definition of public authority should apply and the definition as to what constituted a public authority.

The responses on where an abstraction was causing serious damage was less supported but still more were in favour of the proposal than not. However, several responses wanted to see guidance on the definition of serious damage and how this would be applied.

Others respondents commented that where a practice that was currently legal could not continue as before, it was right that they should be compensated regardless of the circumstance.

A more general issue raised in the consultation about compensation was about the funding arrangements the Agency had in place and whether they were suitable.

Question 11

We proposed that an exemption for ports and harbours should apply as follows:

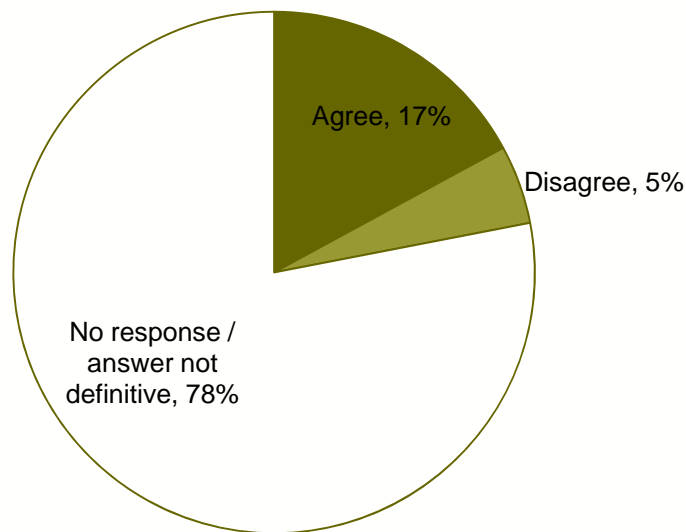
- the exemption would only apply to abstractions made by, or on behalf of, a navigation, harbour or conservancy authority in carrying out its functions as such an authority;
- the purpose of the abstraction was a transfer, without intervening use, of water from any inland waters downstream of the normal tidal limit to a water system in relation to which the authority had functions; and

- the water was abstracted at any time other than in the hour before or in the hour after low tide at the point of abstraction.

The proposed exemption would not apply to any abstraction upstream of the normal tidal limit (i.e. freshwater abstractions).

Q11 Do you support the proposed exemption for ports and harbours?

There were 10 responses to this question:



Most respondents agreed to the proposed exemption to ports and harbours. There was some disagreement with the proposal to restrict the exemption of abstractions in the hour before or in the hour after low tide at the point of abstraction. Although there was acknowledgement that there could be environmental benefit in restricting this abstraction in certain circumstances, it was suggested that there were instances where this restriction would cause constraints on operation with negligible environmental benefit.

It was suggested that a similar exemption should apply to dry docks and the rail network.

Question 12

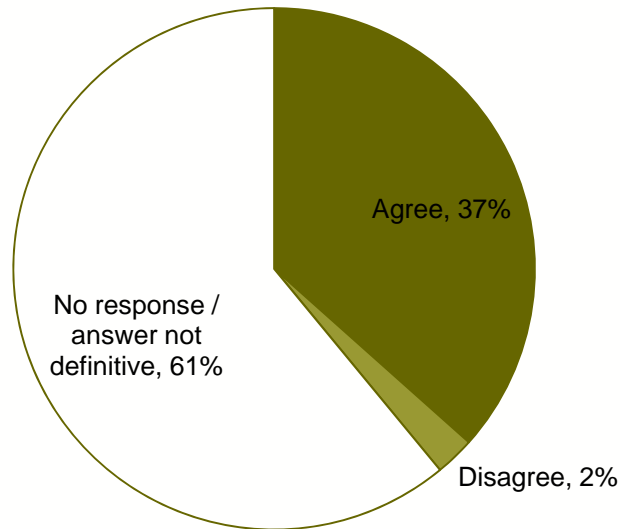
We proposed that an exemption for dredging should apply:

- to any abstraction of water made in the course of dredging in any inland waters upstream or downstream of the normal tidal limit, if that dredging was carried out by, or on behalf of, any “authority” in the exercise of its functions in those inland waters; or

- to any abstraction of water made in the course of dredging carried out by any person in inland waters, but only those downstream of the normal tidal limit.

Q12 Do you agree with the proposed exemption for dredging operations?

There were 16 responses to this question:



Almost all respondents agreed with the proposed exemption for dredging operations. Where there was a lack of agreement from respondents this was around the definition of location and the type of dredging operations that the exemption should cover and possibly expanding the definition to include dredging for other purposes.

Clarification was sought on whether environmental appraisals of dredging activities included an assessment of the archaeology of rivers and lakes.

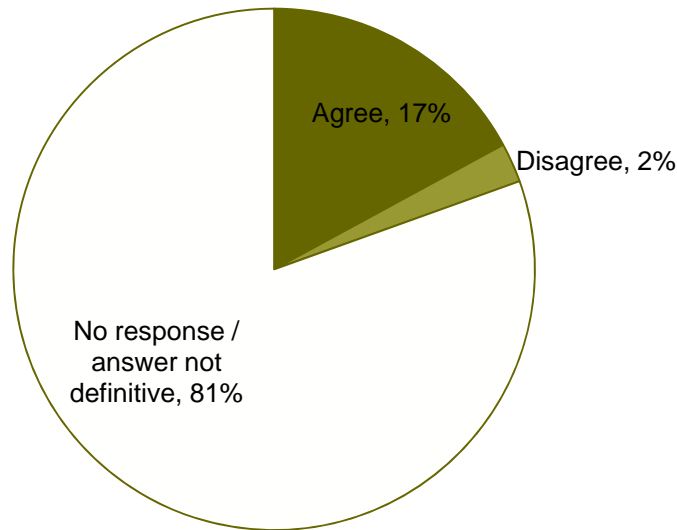
On a more general point, clarity was sought on the definition of a navigation authority's water system.

Question 13

With respect to the proposed exemption on dredging operations an “authority” meant the Environment Agency, any navigation authority, harbour authority, conservancy authority, any internal drainage board or any local authority.

Q13 Does the definition of “authority” cover all public bodies with a statutory duty to undertake dredging?

There were 9 responses to this question:



Those who responded to Question 13 showed general support for the definition of “authority” to cover public bodies with a statutory duty to undertake dredging. However, some responses suggested clarifying and adding to the definition of “authority”.

Question 14

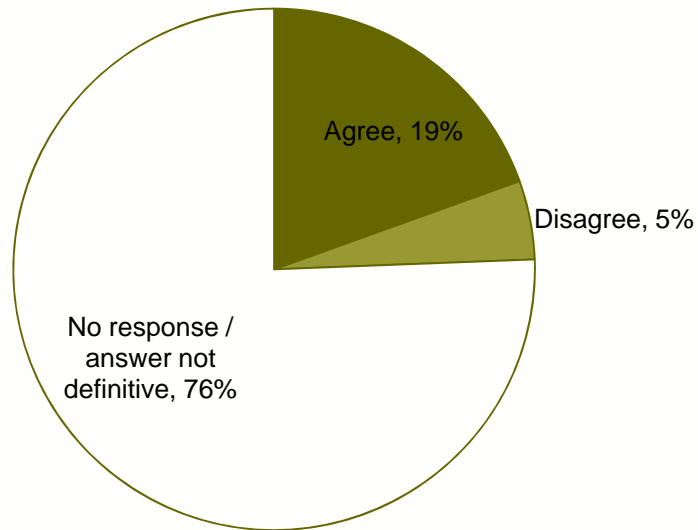
We proposed, subject to consent for the purposes of the Habitats Regulations, exempting from the licensing restrictions the abstraction or impounding of water associated with the management, operation or maintenance of water levels or flows in water meadows.

Should any abstraction licences already exist to which the proposed exemption applies, the regulations would provide for those licences to cease to have effect. In as far as, any impounding licences already existed to which the proposed exemption applies, those licences would continue in force and effect.

The proposed exemption would not apply to the initial abstraction and transfer of water into a water meadow system.

Q14 Do you agree with the proposed exemption for water meadows and that this should be limited to the abstraction or impounding of water within a water meadow where that is necessary solely for the management, operation or maintenance of a water meadow?

There were 10 responses to this question:



Most responses to Question 14 agreed with the proposed exemption for water meadows. A number of respondents requested clarity on the definition of a water meadow and whether the definition included similar wetland systems that should be included in this or another exemption. It was suggested that the exemption should also include the initial transfer of water into the water meadow. Respondents also suggested effective communication with those affected was needed and that guidance would be required.

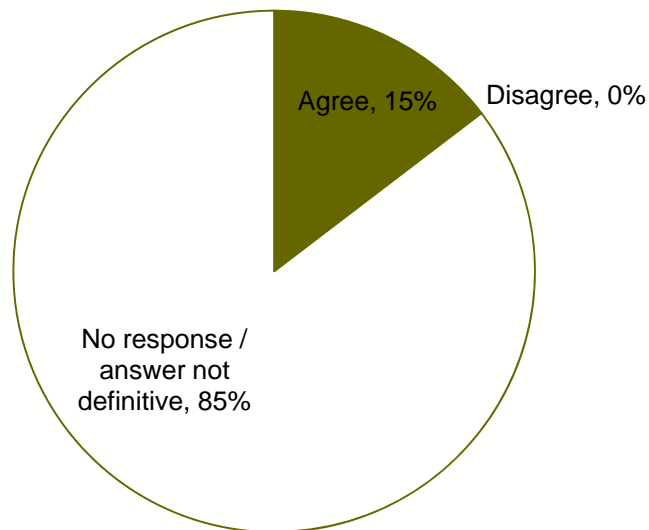
A few respondents expressed concerns that the effective water level management needs of the local environment and water levels may not be properly considered.

Question 15

We proposed that the current exemption from licence control relating to the abstraction of water with a salt content of more than 100,000 mg/l from underground strata in the Cheshire basin be retained and consolidated as part of new regulations governing other exemptions. This exemption would only apply to specified underground strata situated within England.

Q15 Do you agree that the Mersey and Weaver River Authority exemption from licence control relating to the abstraction of water with a high saline content from specified underground strata should continue as at present, albeit in a new legal form?

There were 6 responses to this question:



All those who responded to Question 15 agreed with the exemption without qualification.

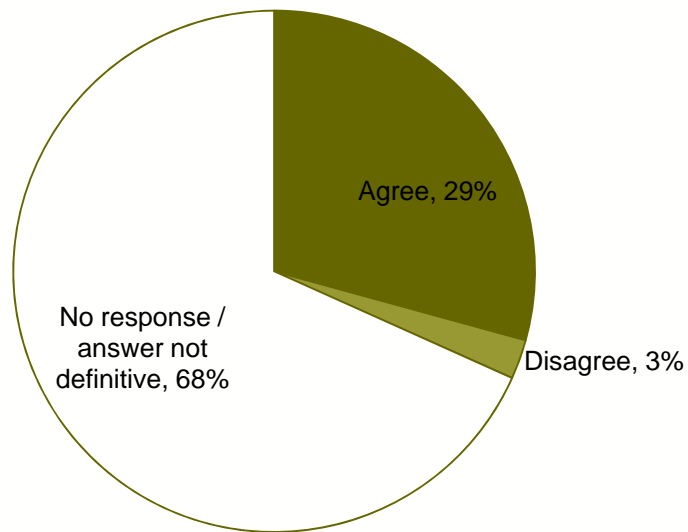
Question 16

We proposed that all new and any alterations to impounding works constructed by or on behalf of Internal Drainage Boards (IDBs) within their areas should be exempt from licence control.

Should any licences to impound water already exist to which this proposed exemption applies, the regulations would provide for such licences to continue in force and effect.

Q16 Do you support the proposal that all new impounding works constructed by or on behalf of Internal Drainage Boards in exercise of their functions and within their appointed areas should be exempt from licence control or, if not, why not?

There were 13 responses to this question:



Generally, respondents were in agreement with the proposed exemption for IDBs. It was suggested that there should be a system to require IDBs to notify the Agency about their work.

Clarity was sought on the level of historic environmental appraisal IDBs undertaken as part of environmental legislation that applies to them.

Next steps

Government will now consider the responses to the consultation and the issues that have been raised. The Government Response will be published prior to the implementation of new regulations.

Annex A

Organisations that responded to the consultation:

Associated British Ports	Transport
Brey Services Ltd	Government / Agency / Public Authority / Regulator
British Aggregates Association	Mineral extractor
British Ceramic Confederation	Mineral extractor
British Waterways	Government / Agency / Public Authority / Regulator
Broad Authority	Government / Agency / Public Authority / Regulator
Caldecott & Wentlooge Levels IDB	Internal Drainage Board
CBI Minerals Group	Mineral extractor
CEMEX	Mineral extractor
Coal Producers	Mineral extractor
EDF Energy	Other
English Heritage	Government / Agency / Public Authority / Regulator
Environment Agency	Government / Agency / Public Authority / Regulator
Farmers Union of Wales	Agriculture
Fish Legal	Other
Hanson	Mineral extractor
Institution of Civil Engineers	Other
Irriplan Limited	Government / Agency / Public Authority

	/ Regulator
JDIH Envireau	Other
Lafarge Aggregates Ltd	Mineral extractor
MJ Carter Associates Limited	Environmental Consultants
MOD Defence Estates	Government / Agency / Public Authority / Regulator
Morgan Est plc	Mineral extractor (civil engineering works)
Natural England	Government / Agency / Public Authority / Regulator
Network Rail	Transport
National Farmers Union	Agriculture
North Level District Internal Drainage Board	Internal Drainage Board
Place UK Ltd	Agriculture
Portsmouth Water	Water company
Royal Society for the Protection of Birds	Other
Sibelco UK	Mineral extractor
SLR Consulting Ltd	Environmental Consultants
Southern Water	Water company
Thames Water	Water company
The Horticulture Trade Association	Agriculture
The Royal Parks	Government / Agency / Public Authority / Regulator
UK Contractors Group	Mineral extractor

Water Management Alliance	Internal Drainage Board
Welland & Deepings Internal Drainage Board	Internal Drainage Board
Welsh Water	Water company
Yorkshire Water	Water company