BRISTOL WATER

Pollution Incident Reduction Plan

March 2026

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Chair's statement

Pennon operates water and wastewater services across the South West and the Isles of Scilly, Bristol and Sutton and East Surrey regions and we recognise the responsibility that comes with this role. Protecting the environment and minimising the impact of our operations is a core part of our purpose as a business.

Pollution incidents across Bristol Water operations in 2025 increased by 12 to 32 compared to 2024. Therefore, we recognise that we must do more.

This Pollution Incident Reduction Plan sets out the actions we are taking to reduce the frequency and severity of pollution incidents. This includes increased use of monitoring and data, improvements to asset maintenance and renewal, and strengthening frontline response capability. Our focus is on reducing environmental risk and improving outcomes.

As the current Executive Chair, with responsibility for the conduct of the whole of the business, I confirm my approval of this Pollution Incident Reduction Plan and the actions set out within it.

I look forward to welcoming our new CEO, Keith Haslett, in April 2026. Keith will assume executive responsibility for delivery of this plan on joining the business, working closely with the Board.

David Sproul
Pennon Group Chair

Foreword

At Bristol Water, we recognise that protecting and enhancing the environment is not just a responsibility – it is a privilege and a promise. Our Pollution Incident Reduction Plan (PIRP) is a clear expression of that promise: to take decisive, transparent, and collaborative action to reduce pollution incidents and safeguard the natural ecosystems that sustain our communities.

This plan has been shaped through meaningful engagement throughout the process with the Environment Agency (EA) and a wide range of stakeholders, including our Watershare+ Panel. Their insights and expectations have guided us in creating a plan that is both ambitious and practical, rooted in regulatory best practice and informed by the principles of the Guidance for reporting and assessing water industry regulation of incidents (WIRI). By embedding resilience and innovation at its core, the PIRP reflects our determination to deliver lasting environmental improvements.

We have followed EA guidance throughout, ensuring that every element of this plan aligns with the highest standards of compliance and accountability. But this is more than a compliance exercise – it is a commitment to continuous improvement, to learning from experience, and to working in partnership with regulators, communities, and customers to achieve shared goals.

This first PIRP for water only companies falls in the second year of the current Asset Management Period (AMP) and will be updated annually to reflect progress, lessons learned, and evolving priorities. This iterative approach ensures that our actions remain relevant, responsive, and effective in driving down pollution incidents year on year.

Our approach has been underpinned by rigorous assurance. The PIRP has been scrutinised and endorsed by our Board. To meet the requirement for CEO-level assurance, the plan is fully assured by our Executive Chair, supported by the Operating Committee, providing confidence that the actions set out here are credible, deliverable, and backed at the highest level of our organisation.

Reducing pollution incidents is a challenge we embrace wholeheartedly. It demands focus, investment, and collaboration – but above all, it demands a shared belief that a cleaner, healthier environment is possible. This plan is our roadmap to that future. Together, we will act decisively to protect our rivers, waterways and landscapes for generations to come.

Executive summary

As we enter the second year of the regulatory period 2025-2030, our commitment to protecting the environment and reducing pollution incidents remains unwavering.

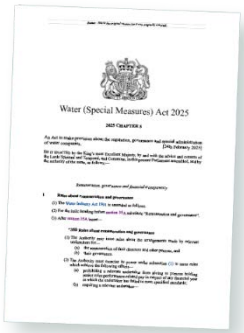
Last year marked the start of a new era for the water sector, with the passing of the Water (Special Measures) Act 2025[1], which introduced mandatory annual PIRPs and strengthened expectations for transparency and accountability. This legislation has reshaped how we plan, deliver, and report environmental improvements, requiring companies to demonstrate clear progress and embed continuous learning into their operations.

We have embraced these changes, aligning our approach with the EA's guidance on PIRPs and its new WIRI framework, which sets out more rigorous standards for incident reporting, Root Cause Analysis (RCA), and corrective action. These developments reflect a growing recognition that customers and stakeholders expect not only cleaner rivers and seas but also protection for homes, land, and amenities from pollution events.

The sector is moving towards a more holistic view of environmental performance, and we welcome this shift.

In 2026 our focus is on scaling up these efforts to do more for the communities we serve. We are delivering the Water Industry National Environment Programme (WINEP) in partnership with the EA, integrating PIRP actions with our capital maintenance programme to upgrade ageing infrastructure, and strengthening our incident management processes in line with WIRI guidance, ensuring events are investigated and lessons learnt are applied across the business.

Our PIRP has been produced in line with the expectations as set out in the Act, with a focus on transparent reporting and credible planning. Whilst we are required to align with Ofwat's pollutions performance commitment, the Act does not set out an obligation for us to achieve precise targets. To manage expectations and mitigate risk, commitments must include confidence levels and context, such as external factors like rainfall and network conditions. Our approach is clear and forthright: specifying with confidence the initiatives we will deliver, while acknowledging the uncertainty surrounding resultant outputs and outcomes.


Water (Special Measures) Act 2025

Pennon Group also owns and operates South West Water and SES water, which have their own separate PIRPs available here:

seswater.co.uk

southwestwater.co.uk

1 Water (Special Measures) Act 2025

About our region

Bristol Water has supplied drinking water since 1846 and currently serve a population of 1.3 million people and 33,000 businesses in an area of 2,400 square kilometres. We supply around 280 million litres of water to customers every day.

Our area of supply extends from Thornbury and Tetbury in the north to Street and Glastonbury in the south, and from Weston-Super-Mare in the west to Frome in the east. Within this, we also have three major reservoirs – Chew, Blagdon and Cheddar – alongside a number of boreholes drawing water from our catchments. In addition to serving customers across this region, we also provide a bulk supply of water to Bath Sewerage services in much of our supply area are provided by Wessex Water.

Nearly half of the water we supply to customers is sourced from outside our area of supply, including from the River Severn. Water is treated at a number of Water Treatment Works (WTW) before being distributed through an extensive network of pumping stations, service reservoirs and mains, ensuring the reliable delivery of high-quality drinking water to customers' properties.

Across the business, we operate 17 treatment works. Our largest site, Purton in Gloucestershire, has the capability to produce 150 million litres of drinking water each day. Around 85% of the water we treat comes from surface water sources, primarily the Mendip reservoirs and the Gloucester and Sharpness Canal, supported by a total of seven raw water reservoirs.

Our raw and treated water networks extend for approximately 6,980 kilometres and include 113 potable reservoirs with a combined storage capacity of 515 million litres, as well as 111 potable water pumping stations and 15 raw water stations. The largest service reservoir, holds 115 million litres of water and plays a critical role in maintaining security of supply across the region.

Our 2025-2030 Business Plan

How we developed our plan

Our 2025-2030 Business Plan was built through a structured and evidence-based process designed to ensure that our priorities reflect the expectations of customers, the requirements of regulators, and the needs of the environment. In developing the plan, we drew on:

- **Customer views** – insights from research, engagement and feedback on service priorities, environmental expectations and affordability.
- **Legal obligations** – statutory duties relating to environmental protection, drinking water quality and resilience.
- **Regulatory requirements** – including Ofwat's PR24 framework, the EA's expectations, and the Drinking Water Inspectorate's standards.
- **Past performance and operational evidence** – analysis of historical performance, asset needs, risk profiles and lessons learned.

This process shaped our PR24 Business Plan ensuring that long-term strategic needs and near-term operational improvements were aligned.

Business Plan
2025-2030

What the process delivered

The PR24 process produced a clear set of outputs that define our commitments for 2025-2030:

- **Completing major upgrades to two major WTW supplying the wider Bristol area**
- **Replacing 34km of cast iron mains**
- **Replacing 9,000 lead pipes serving properties**
- **Reducing water demand by reducing leakage in a region which already has comparatively low rates of leakage**
- **Installing 180,000 smart meters**

Understanding and responding to pollution

Identifying and understanding the sources of pollution is crucial for effective water management. Pollution can be caused by our assets - but also other sectors through agricultural and road runoff, mining and industrial discharges, and urban stormwater.

Pollution cannot always be attributable to a sector. Diffuse pollution can originate from widespread sources such as runoff from urban areas or when contaminants released into the air (from vehicles, plants, factories, etc) settle back onto the ground and water bodies. This is a significant challenge to all parties that care about water quality and will require wide ranging innovative solutions.

Pollution from water operations

During normal operations our assets do not make discharges that impact on the environment and would be designated as a pollution event. However, there are occasions, such as network pipes failing or treatment works processes being out of specification, that result in non-permitted discharges to the environment.

Responding to a pollution incident

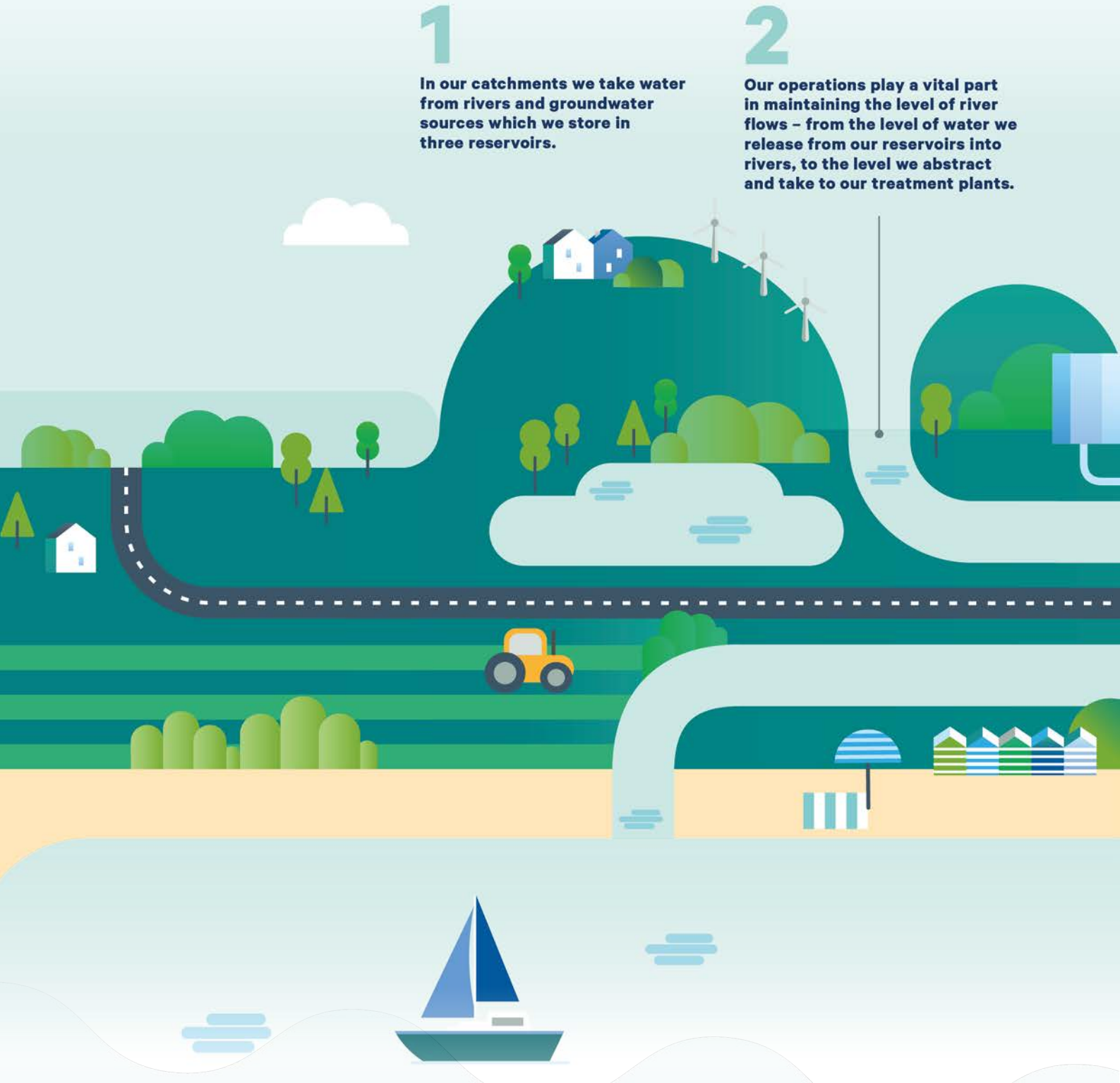
Pollutions are mainly caused by pipes failing or equipment malfunction resulting in discharges to rivers or streams. Our highly trained teams respond quickly to any issues, maintaining services to customers whilst also taking action to reduce impact on the environment.

The management of events is one of the highest priority activities our operational teams undertake. Incidents vary in severity, ranging from those with a significant impact on the environment through to those with little measurable impact.

Our incident response procedures prioritise minimising environmental impact, reporting to the EA and then collecting evidence to clearly assess the extent of any environmental impact. Frontline teams will quickly assess a situation and request additional resource or specialist equipment to manage impact and ensure a discharge is stopped as soon as possible.

If an incident is significant or occurs over an extended period, we will work closely with the EA and provide regular updates to key stakeholders throughout the event.

Working with the water cycle



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Water is treated at one of our 17 treatment works across the region. Every day we treat around 280 million litres of water, that's enough to fill 100 Olympic size swimming pools every day.

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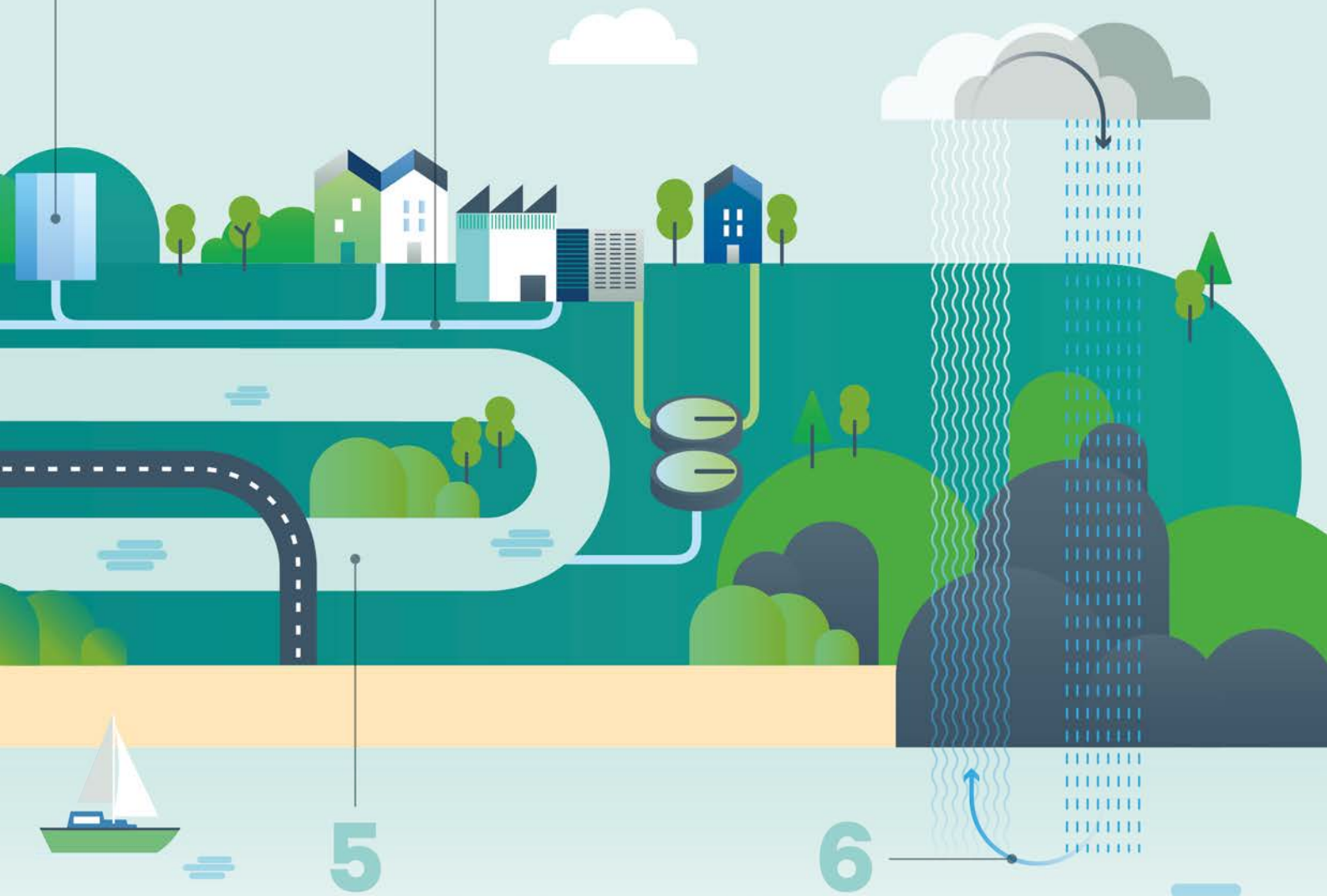
Once the water is safe to drink, we transport this to customers' homes and businesses through our 6,600km of water pipes.



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Waste water services in our region are provided by Wessex Water.

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Water evaporates from the sea and falls onto our catchments as rainfall and the cycle repeats.

Guidance changes and pollution impact

Recently the EA has introduced new guidance on pollution incident reporting called 'Water Industry Regulation of Incidents' (WIRI), intended to improve clarity, and incorporate new technology that provides better visibility of environmental risks. We have ensured that we understand the changes and comply with EA expectations for pollution management processes and reporting requirements.

When we report a potential pollution to the EA, we provide details of the event along with any Impact evidence gathered by our teams. The EA categorise the impact from 1 (most serious) to 4 (no impact). Any pollution categorised as 1-3 will be included in the Environmental Performance Assessment (EPA) published annually by the EA.

Categories of pollution incidents

Category 1
Major incident
This is a serious pollution incident with a significant impact on the environment, people, or property.
It requires an immediate and substantial response to mitigate the effects.

Category 2
Significant incident
This type of incident has a significant impact but is less severe than a Category 1 incident. This category also includes incidents that significantly affect he amenity value of the water environment, such as bathing waters – known as Amenity Category 2.

Category 3
Minor incident
This is a short duration pollution event with a minor impact on the water environment

Category 4
No impact
This category remains an option for clean water incidents, but only where the discharge has been proven to have no impact on the water environment.

Pollution incidents – investigating root cause

All Category 1-3 pollutions will be subject to RCA which will identify both the immediate and root cause of the event. An immediate cause of an event is the direct cause, for example the failure of a piece of equipment. The root cause is the systemic reason(s) that led to the situation where that failure occurred, for example the age or maintenance of the equipment in question.

Investigations into events, including establishing a root cause, are undertaken by trained staff using the "5 Whys" methodology. This approach allows us to fully understand the root causes of incidents and implement corrective actions to prevent recurrence.

As part of our PIRP work programme we will strengthen our ability to analyse incidents in detail to make sure we consistently identify root causes and take suitable actions to protect the environment.

Incidents are reviewed by Senior Management and "Deep Dives" are completed for more serious events, demonstrating a collective commitment to reducing pollutions.

The RCA for clean water incidents encompasses the actions taken in response once a failure is identified, including impact mitigations undertaken by the teams onsite. In the case of a pipe burst we respond quickly to ensure continuity of service to our customers. As part of that response our teams will assess any environmental risk and implement control measures to reduce impact which can include:

- Neutralization of chlorine using de-chlorination tablets
- Slowing the flow of water allows suspended solids to settle out
- Use of silt removal equipment for events where significant amounts of silt have been mobilised

The RCA will also look to establish the pollution pathway, from source to receptor which helps to pinpoint where future interventions should be targeted. For example, when a distribution network pipe fails the flows could enter a surface drain, flowing to a watercourse some distance away and being reported to the EA by a third party.

Our current performance

Our Water Business manages clean water assets serving customers throughout the Bristol region. Across our clean water operations our performance has fallen short of expectations. In response we are enhancing our commitment to pollution reduction, reviewing and learning from events to reduce the risk of future incidents.

We are prioritising a preventative approach, to reduce the risk of harm to the environment whilst delivering value for money to both customers and the environment. This means prioritising maintenance of our assets to make them more resilient.

No matter how much we reduce risk, there will still be times when assets fail, for example when pipes burst which can result in a discharge reaching a water body. When we become aware of any issues with our assets highly skilled teams respond rapidly to both maintain service to customers whilst also reducing the risk of any impact to the environment.

2025 summary

Single serious pollution incident in 2025

31 minor pollution incidents

91% of pollutions self-reported to the EA

90% discharge permit compliance

Monitoring performance

Performance in the water sector is rigorously measured and monitored by regulatory bodies, who ensure that water companies meet high standards of service, environmental protection, and operational efficiency.

Water Company Performance Report

Ofwat, the economic regulator for the water sector in England and Wales, publishes the Water Company Performance Report (WCPR) annually.

This report evaluates the performance of the 16 largest water and wastewater companies across several key metrics - this includes environmental measures including efforts to reduce pollution and enhance water quality.

Ofwat sets stretching performance commitments for companies, which are designed to drive improvements and ensure companies deliver value for money to customers.

Measures in the WCPR

- **Environmental and operational measures:** Progress against target to reduce pollutions, supply interruptions and to enhance water quality.
- **Customer service:** Assessing customer satisfaction, complaint resolution, and support for vulnerable customers.
- **Asset health:** Evaluating the overall performance, compliance and condition of the assets – by measuring burst pipes and treatment works failures– essential to ensure long-term reliability and resilience of supply.

EPA assessment

The EA publishes an annual Environmental Performance Assessment (EPA) which includes measures assessing the environmental impact of water companies. Previously this has only applied to companies that provide water and sewage services but has now been extended to include water only companies such as Bristol.

The water company EPA has fewer metrics but still includes key environmental performance measures; abstraction and impounding licence compliance, total pollutions, serious pollutions, self-reporting of pollution events, WTW numeric permit compliance, WINEP and the Water Environment and Security of Supply Delivery metric (WESSD).

Water Industry Regulation Incidents (WIRI) guidance

The EA is responsible for regulating water quality in England. As part of this activity, they have a duty to respond to, assess and classify incidents resulting from pollution events that impact on water quality.

Internal guidance is provided by the EA and used by water companies to understand expectations and assessment processes for pollution incidents linked to their assets. This guidance has previously been known as 16_02.

In 2023 the EA commenced a review of the 16_02 reporting, recording and incident management processes for water company incidents. The update was driven by the EA's push for stricter transparency and accountability in pollution reporting, aligning with wider regulatory reforms under the Water (Special Measures) Act and Ofwat's performance commitments. The aim is to ensure all pollution events, regardless of perceived environmental impact, are captured consistently across the industry.

Environment Agency's Environmental Performance Assessment

The EPA evaluates water companies on several key metrics to ensure they meet environmental standards:

- **Pollution incidents:** Tracking the number and severity of pollution incidents caused by water companies.
- **Total wastewater pollutions (Cat 1-3):** Monitoring all pollution incidents from minor to major.
- **Total water and wastewater pollutions (Cat 1-2):** Focusing on significant and major pollution incidents.
- **Self-reporting levels:** Assessing the extent to which companies self-report pollution incidents, which is crucial for early intervention and mitigation.
- **Compliance with numeric environmental permits:** Measuring how companies adhere to the conditions of their environmental permits at wastewater treatment works and water treatment works.
- **Water resources:** Assessing to what extent a water company can meet water demand, especially during drought conditions. It measures the balance between the available water supply and the demand for water, considering factors like climate change, population growth, and environmental protection. This helps identify the risks around water shortages and guides water companies in planning and implementing measures to ensure a resilient water supply.
- **WINEP delivery:** Evaluating the delivery of the Water Industry National Environment Programme, which includes actions and investments to meet environmental and regulatory requirements.

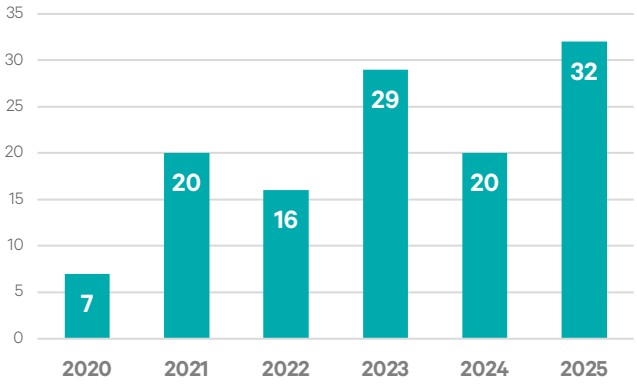
Key performance metrics

Pollutions are reported by companies to the EA and are categorised according to impact on land, air and / or water. Assessment is based on a number of factors, including the actual or potential ecological, amenity, fisheries or water resource impact from an event. This data has been published for water and sewage companies since 2011 and will be published for water only companies from 2027

Pollution performance 2020 to 2025

The chart below displays BWL pollutions (Category 1 to 3) per year from 2020 to 2025.

Bristol Water Cat 1-3 pollutions 2020 to 2025



The chart shows that the number of events has been increasing over time and 2025 is the highest to date. This highlights the need for our PIRP initiatives designed to identify and address the root causes of pollutions from our assets in 2026.

Treatment Works compliance

We receive permits from the EA, which allow us to discharge process effluent, with strict limits on the volume of these discharges and their contents. We routinely sample discharges to ensure we meet these parameters.

WTW are permitted to discharge process effluents with specified limits for volume, constituents and other parameters such as pH. There are two ways that discharges are checked for compliance with the permit:

- For water and sewage companies sampling is undertaken by separate teams within the company under the operator self-monitoring (OSM) regime, with results being provided to the EA
- In Water only companies Regulatory sampling and testing is undertaken by the EA and the results are then reported back to the company.

The figure below shows the frequency at which we failed to comply with our permits for the years 2020 to 2025. As can be seen we recorded single permit exceedances in 2020, 2024 and 2025 and in response we have established a company-wide compliance programme with Executive oversight.

There are regular oversight meetings where performance Is reviewed, and compliance scheme delivery is tracked.

Bristol Water WTW permit non-compliance 2020 to 2025

Section 1.
Pollution incident frequency, seriousness and their causes

Our pollution performance in 2025[2]

Water pollution incidents

We are committed to minimising our impact on the environment. Our immediate focus is on reducing the risk of harm caused by discharges from our treatment works. Overall, we have high levels of self-reporting incidents, demonstrating our commitment to transparency and regulatory compliance.

Total events Category 1-3

In 2025 we recorded a total of 32 category 1-3 pollution incidents. There were 31 incidents assessed by the EA as minor impact (category 3) of which 29 were attributed to the distribution network, one to a raw water main and one to a WTW.

There was a single serious (category 2) event attributed to a treatment works.

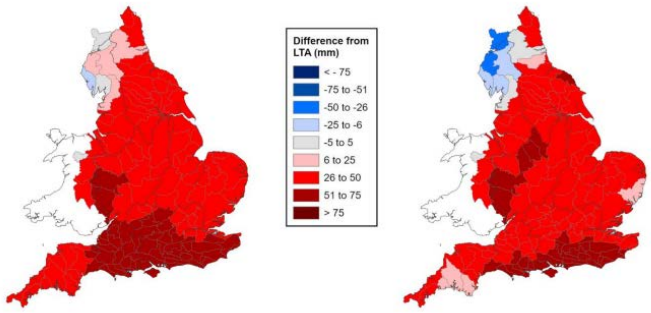
Factors impacting performance

While the south west of England saw higher rainfall in 2025 than many other areas in the UK, other areas including the Bristol region received significantly less than the long-term average (LTA).

Dry, sunny weather over an extended period causes a reduction in soil moisture levels leading to shrinkage and ground movement. Higher temperatures also cause materials to expand, affecting pipes and joints in the network. Both these factors make it more likely pipes will leak or even burst and so increase the risk of a pollution occurring.

We experienced exceptionally dry weather in 2025 and this helps to explain the peak of seven network events reported in August.

Soil moisture deficit May – June 2025



Source: Met Office, Crown copyright, 2025

The warmer conditions coupled with low rainfall also affected the wider environment in several ways, including reducing oxygen levels in streams and rivers. There are several factors that contribute to this reduction:

- Lower river levels generally result in slower flows and less agitation of the water surface, reducing the entrainment of oxygen from the air above
- In warmer water oxygen is less soluble and also diffuses more readily from the surface
- Plant and algae growth accelerates with increased levels of sunlight. This helps boost oxygen levels during the day but at night plants switch to respiration for their energy needs, using up oxygen from the water
- Bacteria consume oxygen as they feed on organic matter such as dead plants, algae and agricultural run-off.

Fish living in waterbodies experiencing unusually high temperatures will already be stressed, compounding the effects of lower oxygen levels. Larger fish require more oxygen so the older individuals of certain species can be disproportionately affected by these kinds of conditions.

There are other risks that are increased by low river levels including the impact from industrial or agricultural discharges. The reduced volume of water provides less dilution capacity so the concentration of any pollutants present could remain raised over an extended area.

2 Data presented and used in this section is based on the latest pollution incident data held by the EA for 2025. Therefore some discrepancies may be present between information presented here and the final EA tracker for 2025.

Pollution performance by asset type

Distribution network

Drinking water leaves our treatment works and enters the distribution network. This is a series of pipes, tanks and pumps connected to pretty much every home and business across our operating areas. The network is designed to be resilient, consistently delivering clean water to customers across the region.

Assets including service reservoirs, pump stations and pressure reducing valves work seamlessly together to smooth out the variable demand, maintaining a consistent pressure even during peak usage times.

The backbone of the system are the trunk mains which carry huge volumes of water from our treatment works out to towns and cities. Water then passes into lots of smaller pipes running around a town, called the distribution network.

Houses and businesses are connected to the distribution main by a communication pipe (usually owned by the water company) and a supply pipe inside the boundary which is generally the responsibility of the property owner.

We have dedicated network technicians working to maintain and repair the distribution network across our region. Our 24/7 Control Room monitors treatment works output, reservoir levels, and telemetry alarms, amongst other activities, and makes decisions on the strategic transfer of water whilst adhering to an overall strategy set by the Water Resources team.

Sometimes issues do occur, at a treatment works or out in the distribution network, which could affect water supply and / or impact on the environment. The configuration of our network helps reduce this risk as most areas can be supplied from different points, meaning the problem can be isolated without affecting service to customers.

If a pipe does burst, there will be a discharge of potable water and possibly mobilisation of silt from the surrounding area which could enter a watercourse. Our teams understand these environmental risks and will employ suitable reactive measures to contain flows, capture suspended solids and neutralise chlorine to minimise any potential impact on the waterbody.

Our performance

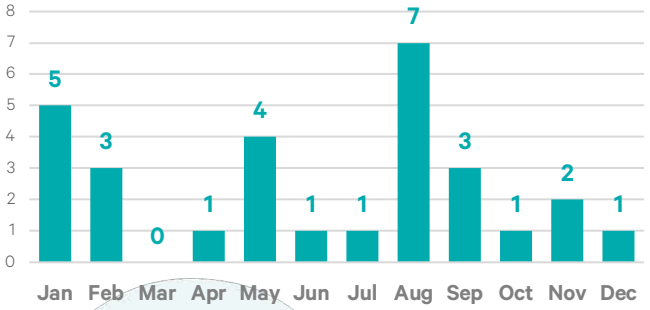
The table below shows the pollutions attributed to distribution network assets by month and the impact category assigned. All events were categorised as a category 3 (minor impact) by the EA.

Bristol distribution network frequency and seriousness of pollutions in 2025

Month	Cat 1	Cat 2	Cat 3
January	0	0	5
February	0	0	3
March	0	0	0
April	0	0	1
May	0	0	4
June	0	0	1
July	0	0	1
August	0	0	7
September	0	0	3
October	0	0	1
November	0	0	2
December	0	0	1
Total	**0**	**0**	**29**

The graph below shows the frequency of pollutions per month, illustrating the clustering of events during the dry summer period. August saw the highest number of pollutions in a single month with seven recorded.

Bristol frequency of pollution incidents in 2025

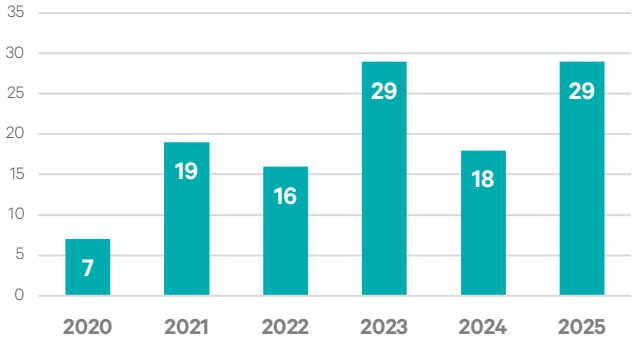


As can be seen in the figure below the number of category 1-3 pollutions increased in 2023, which can be partially explained by a training and awarness campaign that took place at this time. This helped to increase our self reporting of incidents to 97%.

Our self reporting in 2025 was slightly lower at 91% and our 2026 PIRP intiatives will include measures to increase self reporting of incidents.

In 2024 there was a decrease in the number of network pollutions to 18, but we have seen an increase in 2025 to 29 (minor) events in 2025 with a self reporting rate of 93% (for network events). This means that 26 of the events were self reported, with three reported to the EA by a third party.

Bristol distribution network pollution incident number 2020 to 2025



Root cause

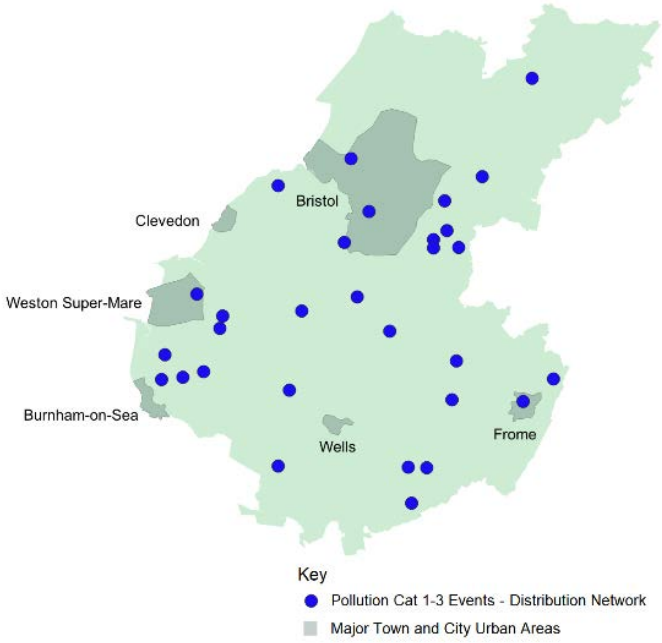
All distribution network pollutions in 2025 have been allocated the same immediate cause; failure of pipe material allowing sufficient flow to escape for the discharge to be considered a 'burst', as opposed to a lower flow categorised as 'leak'. As can be seen in the table below the root cause attributed to all 29 events is 'age and deterioration'.

Root cause of distribution network pollution incidents

Root cause	Immediate cause	Cat 3 pollution incidents (number)	Cat 3 pollution incidents (%)
Age and deterioration	Pipe failure	29	100%

It is certainly the case that a proportion of events are due to the weakening of pipe material over time, however, there are also other factors which contribute to the failure event. We recognise that the current RCA process is not sufficiently granular to identify these factors and consequently opportunities to prevent pollutions may be missed.

Location of water network pollutions in 2025



These additional causes could be outside of our control, for example ground movement caused by sudden swings in temperature or extended periods of very dry weather. The older parts of the network, constructed of rigid materials such as cast iron, are more susceptible to changing ground conditions than newer sections which are more resilient due to improvements in pipe technology.

There are other factors which can contribute to pipe failures and are within our control, such as the standing pressure in pipes and rapid changes that can be caused by valve operations.

There is a PIRP initiative, outlined in section 2, specifically designed to enhance our RCA processes. This will enable identification of other factors contributing to pollutions from network assets so targeted corrective actions can be taken.

‘Other’ assets

There was a single pollution incident caused by the failure of a previous repair on a large raw (untreated) water main. When the repair failed the pipe material fractured and a significant volume of water escaped, mobilising silt which entered a watercourse. The impact was short lived, and the pollution was categorised as minor by the EA.

As the asset was a raw water main and does not fit into the ‘water treatment works’ or ‘water distribution system’ EA asset categories it has been allocated to the ‘other’ asset group.

Bristol 'other asset' frequency and seriousness of pollutions in 2025

Month	Cat 1	Cat 2	Cat 3
January	0	0	0
February	0	0	0
March	0	0	0
April	0	0	0
May	0	0	1
June	0	0	0
July	0	0	0
August	0	0	0
September	0	0	0
October	0	0	0
November	0	0	0
December	0	0	0
Total	**0**	**0**	**1**

Root cause of 'other asset' pollution incidents

Root cause	Immediate cause	Cat 3 pollution incidents (number)	Cat 3 pollution incidents (%)
Age of repair	Repair failure	1	100%

The root cause of the event was the age of the pipe, combined with the period of time that the repair had been in place.

Water Treatment Works

A drinking WTW is where we clean raw water, so it becomes safe to drink. Most of the water we supply comes from surface water sources, with only about 15% abstracted from aquifers underground.

We have seventeen treatment works across the Bristol region operating 24 hours a day, 365 days a year to produce the clean, safe water our 1.3 million customers rely on every single day.

At the works, water passes through several treatment stages to remove debris, smaller particles, chemicals, taste and colour. Finally, the water is disinfected to make sure it is safe before it is stored and supplied to homes and businesses.

Treatment processes vary depending on the raw water source, number of customers served, and treatment works design. There are also commonalities across sites, for example any discharge to the environment has to be operated under a permit issued by the EA.

Sites with numeric permit conditions have to ensure any discharges do not exceed specific limits to be compliant. Occasionally the effluent from a works may breach the limit for a parameter which would be recorded as a site non-compliance.

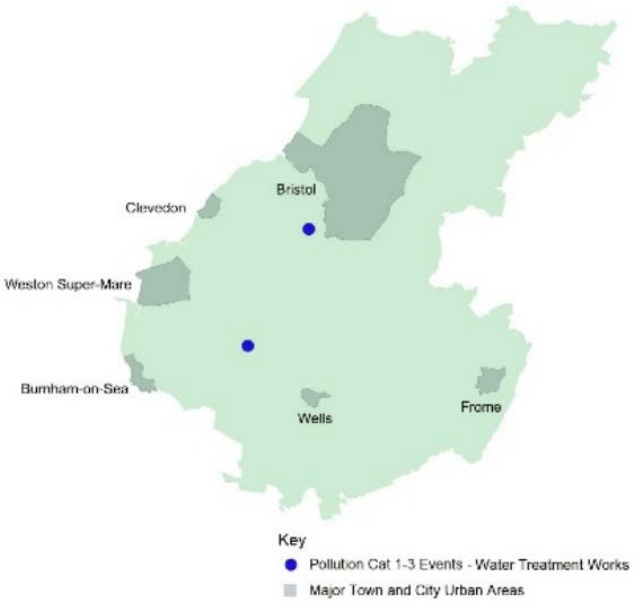
All compliance failures are reviewed and corrective actions implemented to prevent recurrence. There can be other instances where a site has an unpermitted discharge, for example if a spillage occurs which enters a surface water drain which then connects to a watercourse.

The table below lists the pollutions from treatment works assets by month and the impact category assigned. We have had two pollution events attributed to treatment works in 2025, one in April at Barrow works (Cat 3) and one in August at Cheddar treatment works (Cat 2).

Bristol frequency and seriousness of Water Treatment Works pollutions in 2025

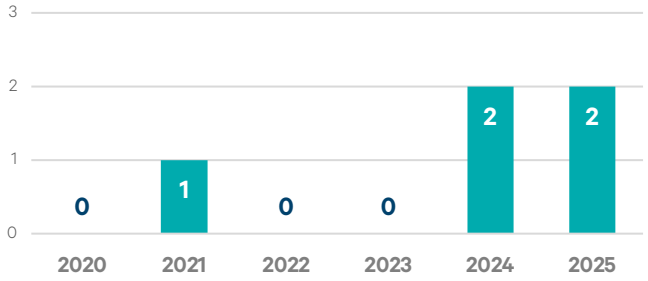
Month	Cat 1	Cat 2	Cat 3
January	0	0	0
February	0	0	0
March	0	0	0
April	0	0	1
May	0	0	0
June	0	0	0
July	0	0	0
August	0	1	0
September	0	0	0
October	0	0	0
November	0	0	0
December	0	0	0
Total	**0**	**1**	**1**

Location of Water Treatment Works pollutions in 2025



As can be seen in the figure below there are low total numbers of Cat 1-3 pollution events attributed to WTW with five events over the past six years. However, three of the five events have been deemed to have a serious impact on the receiving watercourse (Cat 2) and occurred in 2024 and 2025. All three of the events were related to chemical controls and consequently this is a key focus area for relevant PIRP initiatives.

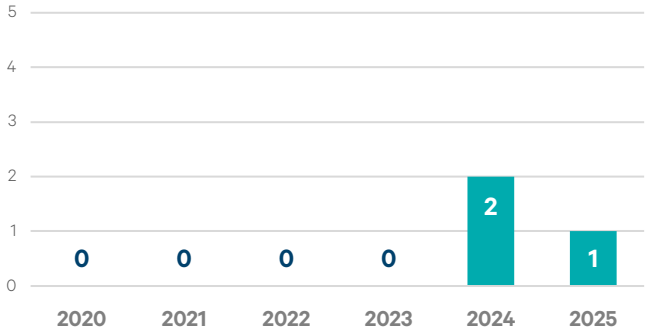
Bristol Water Treatment Works pollution incident number 2020 to 2025



Serious pollution incidents

There was one serious pollution Incident attributed to one of our treatment works in 2025. The event occurred at Cheddar Treatment Works and has been fully reported to the EA. As their assessment of the incident is ongoing, we are unable to provide additional information at this stage

Bristol serious pollution 2020 to 2025



Root cause of pollution incidents

All Category 1-3 pollutions are subject to RCA (as described in the 'understanding and responding to pollution' section above). Through this process we identify both the immediate and root cause of the event. An immediate cause of an event is the direct cause, for example the failure of a piece of equipment. The root cause is the systemic reason(s) that led to the situation where that failure occurred, for example the age or maintenance of the equipment in question.

We have had a single Cat 3 event at Barrow treatment works (NIRs number 2381276). This was a minor exceedance of chlorine limits picked up during routine sampling and reported as a precaution. The sample result was not confirmed as routine sampling cross checks were not completed, but as a precaution the incident was self-reported to the EA. There have been actions taken to prevent recurrence including reiterating the sample cross check process to the site technicians and undertaking a review of the sampler discharge dechlorination equipment.

Root cause of Water Treatment Works pollution incident

Root cause	Immediate cause
Insufficient dechlorination / sample issue	Discharge from instruments and analysers

Section 2.
The steps taken to maintain the system

Environmental sustainability

Our Business Plan for 2025–2030 is heavily focused on environmental sustainability. We are committed to protecting and enhancing natural habitats, reducing pollution, and promoting biodiversity - supported by record levels of investment in our asset base and innovative green solutions.

The primary measures of environmental impact addressed in the PIRP are pollutions and permit compliance. Recognising shortfalls in these areas we will accelerate improvements as part of our broader commitment to safeguarding the natural environment. We are committed to transparency and will report regularly on our progress to ensure accountability and continuous improvement.

The Ofwat performance commitment levels (PCL) for our environmental outcomes are in the table below. We include our targets but acknowledge that these targets are ambitious in nature, and complicated by the recent changes to the WIRI guidance.

It must also be noted that Ofwat consulted on, and are in the process of updating, three of our PR24 Business Plan Performance Commitment Levels, in response to the new WIRI Guidance. At the time of publication, the final incentive design has not been confirmed, and we therefore do not have re-baselined PCLs following the new WIRI Guidance.

To manage these expectations and mitigate risk, our commitments include projected savings modelled as ranges and context and consider external factors like rainfall and network conditions. Our approach therefore specifies the initiatives and what we plan to deliver whilst acknowledging the uncertainty surrounding the impact of each measure (i.e. number of Category 1-3 incident prevented) and broader environmental outcomes.

The impact on pollution numbers caused by the changes in the EA reporting guidance (WIRI) will not be fully understood before the PIRP statutory publication date. Our assessment of the guidance is that there is not expected to be an increase in the number of events attributed to drinking water assets. Consequently, the number range in the initiative tables column ‘estimated pollutions prevented’ is the same for both the WIRI and previous EA guidance.

	2025/26	2026/27	2027/28	2028/29	2029/30
Serious pollution incidents (Cat 1 and 2)	0	0	0	0	0
Treatment works compliance	100.00%	100.00%	100.00%	100.00%	100.00%
Biodiversity	0	0	0	0.08	0.73

Our delivery programme

Our PIRP is structured as a five-year programme within the current AMP. Our primary focus is on delivering existing and new commitments effectively to ensure they achieve the intended environmental benefits. Overall, we expect that the additional measures, alongside our existing commitments, will support sustained improved performance and contribute towards our Ofwat pollution performance commitments.

We have held internal stakeholder workshops to review pollution incident performance and identify opportunities for improvement. Where measures have been identified that strengthen performance without compromising delivery of existing commitments, these have been incorporated into the plan.

The measures included have been mapped directly to the root causes of incidents we have caused, with a particular focus on reducing serious pollution incidents. At a national level we expect these measures to be effective in addressing recent pollution incident performance associated with chemical management and operational controls, focusing on early intervention at higher risk locations.

While these measures should significantly reduce the likelihood and severity of incidents, some performance issues identified cannot be fully resolved within a single year. Additionally, some initiatives record 0 direct pollution savings within the calendar year, however these activities contribute to and enable future reductions, delivering longer term benefits. These risks are being addressed through longer term investment plans.

All asset types

Our strategy

In developing our PIRP we reviewed our existing and future activity across the whole of Water Services National. This has resulted in the development of a cultural programme called **Clean, Green, Safe** covering the key tenants underpinning business performance. This will be achieved by reinforcing our culture of environmental responsibility and continuous improvement, ensuring everyone is committed to reducing the risk of environmental harm.

- **Clean** – consistent supply of high-quality water to our customers.
- **Green** – making sure we always operate in an environmentally responsible way.
- **Safe** – making sure our employees and all other people who have reason to interact with our business are protected from harm.

Cultural focus

We understand that to deliver on our performance ambitions we need to ensure our actions are consistent with the values outlined in 'Clean, Green, Safe'. Part of the water services performance enhancement model has been the establishment of a dedicated change management function, who will be supporting the PIRP initiatives including the cultural workstream.

Strong governance is vital for success, and our new structure is deigned to expedite decision making whilst also ensuring the choices made will deliver the desired performance improvements. The new change management structure provides:

- **Strategic change programmes and projects** – appropriate governance and oversight provided by Executive Leadership.
- **Performance and business improvement** – taking an agile approach to encourage change at pace with oversight and challenge provided by Executive and Senior Leadership.

Operating model

The Clean Green Safe programme will be composed of key workstreams, underpinned by a revised governance structure. We will align environmental purpose with our strategy, with measures linked to both environmental and cultural performance indicators.

The current operating model will be enhanced to ensure that there is consistency of approach across Water Service National (WSN) while still providing sufficient autonomy for the separate businesses to act in the best interests of their local environments. This will be achieved by providing greater clarity on roles, responsibilities, and ownership for environmental outcomes.

Communication

A key ingredient of success is regular, open, and transparent conversations about what is going well and where we could improve. Existing ways of raising awareness and engaging with our teams will be augmented with training and coaching. We are making changes to improve how we communicate with our colleagues, refining existing methods and establishing new forums designed to encourage listening, national collaboration, and continuous improvement.

Capability, training and behaviours

To deliver and maintain our desired level of performance we must ensure people have the right skills, knowledge and behaviours to be clean, green and safe in all their work. While we already have established competency frameworks these will be reviewed with both general and role specific packages being enhanced where appropriate. The training will be aligned to the key activities defined in the operating model to ensure that there is line of sight from those accountable to the individuals responsible for the activities that drive performance.

Process, systems, and digital

As with many large organisations not all of our processes and systems are as integrated as we would like. To address this issue there will be a workstream dedicated to improving systems, data and workflows. This work will include standardising policies and procedures, exploring potential automation of asset monitoring, single platforms to increase productivity and standardised processes for frontline staff.

Stakeholder, regulator, and community engagement

We will continue to build trust and transparency with communities, regulators, and partners. This will be achieved by an open, transparent incident reporting approach, sharing accessible performance data and strategy delivery progress. Additionally, we will continue to build on existing foundations to enhance community engagement via schools, citizen science projects and volunteering.

Pollution incidents – Root Cause Analysis (RCA)

The Water Services National RCA methodology is to ensure a thorough and consistent approach to all investigations where a failure, non-conformity or unexpected outcome has occurred.

It is necessary to ensure that the business understands the true cause of a failure and the risk, both immediate and long term, the business may hold. It enables short, mid, and long-term actions to be identified, scoped, and delivered. Any confirmed pollution incidents will be investigated by trained staff to establish the root cause, using the “5 Whys” methodology. This approach allows us to fully understand the root causes of incidents and implement suitable corrective actions to prevent recurrence.

We plan to undertake a full review of our process, working to improve our ability to analyse incidents in detail, identify true root cause and implement corrective actions. Our approach targets the creation of a learning organisation that rapidly identifies, escalates and learns from incidents. This will be achieved through key actions including a standardised incident escalation criteria with defined timelines and responsibilities.

Specific asset upgrades

Our strategy ensures the robustness and environmental compliance of our assets by strategically allocating resources to minimise pollution risks and enhance infrastructure resilience. For our WTW one way asset health is enhanced is the site ‘MOT’ programme. This comprises a thorough inspection of the whole treatment site followed by targeted investment designed to increase resilience. The equipment for both storing and using chemicals is included in these inspections, which is outlined in more detail under the ‘chemical barriers’ initiative in the following tables.

Programmes of asset maintenance

Our maintenance programme is designed to increase asset reliability and long-term performance. This includes proactive and preventative maintenance strategies and the use of techniques such as condition-based monitoring. These methods enable timely intervention which should reduce failures, extend asset life, and maintain compliance with environmental standards.

Measures taken to maintain all asset types in 2025

Measure	Description of actions	Scale of action(s)	Estimated (pollutions prevented)	Root cause addressed	Recent pollution incident performance issues identified in the DWMP	Delivery status
Company cultural or behavioural change	1. Creation of new organisational design with centralised management, reporting and business change functions	WSN Executive / senior management structure and organisation design	1-2	General	Pollution risk	In progress
Staff training (business-wide)	1. Mandatory training is in place for all employees covering both general and task specific activity. 2. Further specialist training is provided as required by role	100% of frontline employees receive role specific training	1-2	Human error	Pollution risk	Pre-existing
Root Cause Analysis techniques	1. There is an established event management process which includes an element of RCA 2. RCA are conducted for events but there are not mandated incident types / impact thresholds that would trigger a root cause investigation	100% of events meeting a certain severity threshold will be subject to RCA	0	Root cause	Pollution risk	Pre-existing
Total estimated impact on pollution numbers			**2-4**			

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Planned additional measures for all asset types in 2026

Additional measures	Description of actions	Scale of actions in next calendar year	Estimated impact in next calendar year	Root caused addressed	Recent pollution performance issues identified in the DWMP	Start date	Completion date
Company cultural or behavioural change	1. Development and delivery of the Water Service National (WSN) 'Clean, Green and Safe' programme 1. Deliver the above programme to appropriate WSN teams in order to raise awareness in three key areas: > **Clean:** a focus on water quality; > **Green:** the importance of ensuring high standards of environmental protection are maintained during all of our operations; > **Safe:** prioritising health and safety of our people and community. 2. Review and confirm governance structures for environmental performance across WSN 3. Review existing pollution prevention procedures and ensure consistency across WSN operations 4. Integrate environmental protection KPI's into relevant team charters	Phase 1 of clean green safe will be delivered to at least 75% of WSN in 2026 Priority Consultants and contractors will be included in the delivery phase	1-2	General	Pollution risk	Jan-26	Dec - 26
Staff training (business-wide)	Deliver mandatory training programmes as required for each job role. Existing training relating to environmental protection will be enhanced as part of the Clean, Green & Safe programme. Scope of enhanced training to Include: 5. Standard Induction of employees to include reference to our environmental protection obligations and processes 6. Overview of current regulation and guidance	At least 75% of frontline teams will receive environmental overview / training in 2026	1-2	Human Error	Pollution risk	Jan-26	Dec - 26
Improve Root Cause Analysis techniques	1. Review and enhance the existing process to reflect best practice within the group 2. Deliver training to relevant staff across WSN to ensure consistent application of the revised process	RCA procedure will be updated and training provided. Increased number of events will be subject to RCA	0	General	Pollution risk	Jan-26	Jun-26

Additional measures	Description of actions	Scale of actions in next calendar year	Estimated impact in next calendar year	Root caused addressed	Recent pollution performance issues identified in the DWMP	Start date	Completion date
Enhanced incident response	1. Review of existing response processes 2. Review pollution response equipment available to relevant teams 3. Undertake internal assurance across a sample of pollution event responses to ensure continuous improvement opportunities are identified and actioned 4. Update policies, procedures and equipment as required from the above	Response process will be fully reviewed and updated in 2026. Training will be provided to all employees who manage the incident response process	2-4	Incident response	Pollution risk	Jan-26	Dec - 26
Total estimated impact on pollution numbers			**4-8**				

Resources and production – Reservoirs and Treatment Works

Our WTW play a crucial role in providing the clean, safe drinking water that you, our customers, rely on every day. These sites are designed to be both flexible and resilient, able to handle changes in water quality and even cope with extreme weather when it occurs.

Across all our treatment sites, we regularly carry out thorough inspections—similar to an 'MOT' for your car – so we can target investment where it will most improve reliability and performance.

While our highly skilled technicians already receive in-depth training for compliance and environmental protection, we will be reviewing our training to see where we can make things even better, strengthening both our processes and our staff development across the water production team.

We recognise that control of chemicals has not been as robust as it should, so we will be reviewing all stages in our process from delivery, to storage, use and then disposal. Where needed, action will be taken to improve assets, increase understanding of risk and strengthen control measures to reduce the pollution risk from our sites.

Making sure we operate to the highest standards is very important to us. That is why we have a robust system of assurance, including regular first-line checks by our own staff and in-depth audits by specialist teams. These controls ensure that processes are followed and are effective at appropriately managing risk. In 2026, we will be reviewing how often we audit, what we check, and how quickly any issues are put right. This will help us create an even stronger system, which will increase visibility of performance including key measures such as site compliance and chemical management.

The reservoirs that feed our treatment works store millions of litres of water and are strictly regulated for safety by the EA. One important safety rule is that we must be able to quickly drain water if there is an issue with a dam or other structure. This is done by opening a 'scour' valve, which lets a large amount of water flow quickly into the river below the dam. To make sure these valves will work if needed, we have a legal duty to conduct regular tests. When the valve is opened the water will increase the flow in the river downstream and there may be some discoloration from silt disturbance. When conducting tests, we always follow regulatory guidance, including monitoring and reporting any potential impact to the EA. Going forward we will continue to work closely with the local EA teams to reduce the risk of harm from these mandatory discharges.

One of the workstreams during 2026 will be reviewing all assets and discharges across the water businesses to ensure that the correct permits are in place and up to date. Initially, we will be establishing the knowledge, skills and resource levels required to deliver this work. After this we recognise that there will need to be a multiyear project to work through the permitting estate and make the necessary changes with the EA.

Measures taken to maintain Treatment Works in 2025

Measure	Description of actions	Scale of action(s)	Estimated impact (pollutions prevented)	Root cause addressed	Recent pollution incident performance issues identified in DWMP	Delivery status
Staff training (asset type specific)	1. There is an established water treatment training programme 2. The combination of progression scheme and training feed into the competent operator scheme certification.	100% of technicians receive task specific training	1-3	Human error	Pollution risk	Pre-existing
Site chemical barrier implementation	1. Site reviews and upgrades have been completed in accordance with a DWI notice as a programme of 'MOTs' 2. The MOT is a full site survey and identifies investment need across the entire asset base.	70% of sites have MOT inspections completed	1-3	Chemical controls	Pollution risk	Delivered in year

Measure	Description of actions	Scale of action(s)	Estimated impact (pollutions prevented)	Root cause addressed	Recent pollution incident performance issues identified in DWMP	Delivery status
	3. This includes maintenance of existing chemical barriers / controls and installation of additional protection based on assessment of risk					
Site audit programme	1. Site audits are undertaken by the managers which include environmental risks and controls 2. Second line assurance is provided by the Pennon Risk and Compliance function 3. All sites are visited on a prearranged schedule with corrective actions tracked to completion	100% of sites have first line assurance completed, 2nd line assurance of works is on fixed rotation	2-3	Chemical controls	Pollution risk	Pre-existing
Scour valve management	1. Reservoirs (resources) 2. Scour valve maintenance and regular operation is undertaken by the M&E team and the reservoir specialists. 3. Contact is made with the EA when this work is planned as part the mitigation against harming the environment 4. Scour valve process is established and includes contact with the EA before operations are conducted 5. Tests are monitored and any impact is reported in accordance with guidance	Scour valve process established c.50% Valves are tested P.A	1-2	NA	Pollution risk	Pre-existing
Total estimated impact on pollution numbers			**5-11**			

Planned additional measures for Treatment Works in 2026

Additional measures	Description of actions	Scale of actions in next calendar year	Estimated impact in next calendar year	Root caused addressed	Recent pollution performance issues identified in the DWMP	Start date	Completion date
Staff training (asset type specific)	1. Employee progression scheme requires competency to be demonstrated before sign off 2. Review training and competency to align with the 'Clean, Green, Safe' principles 3. Review water treatment technician progression schemes across the group to align environmental protection measures incorporated	100% of training to be reviewed At least 75% of technicians to receive CGS overview specific to asset type	1-2	Human error	Pollution risk	Jan-26	Dec - 26
Site audit programme	1. Implement a risk-based audit programme focussed on existing chemical storage and containment facilities, including actionable alarms associated with asset failure / pollution risk 2. Undertake a review of existing chemical delivery procedures and processes 3. Review existing site drainage plans	100% of 1st line assurance to be subject to 2nd line checks 100% site drainage plan status to be confirmed	1-2	Chemical management	Pollution risk	Jan-26	Dec - 26
Site chemical barrier implementation	1. Implement a risk-based investment programme as identified in the audit / inspection activity	Completed environmental risk assessments for all main water treatment works	1-2	Asset failure	Pollution risk	Jan-26	Dec - 26
Permitting	1. Work with the EA as part of the "Run to Waste" (RTW) programme to review discharges and permitting estate. This applies to assets as defined in the EA project covering RTW exemptions, standard rules permit and low risk bespoke EPR permits	Establish permitting approach across WSN and resourcing requirements. Baseline current permit estate	Permitting review is not directly linked to pollution reduction	Compliance	Pollution risk	Jan-26	Dec - 26

Management of clean water discharges	1. Review process & controls for RTW discharges and clean water mains to ensure that risks of uncontrolled discharges into the environment are minimised	100% of RTW processes to be reviewed 100% relevant employees to receive update on RTW procedures	Planned clean water discharges did not cause any pollutions in 2025	Discharge management	Pollution risk	Jan-26	Dec - 26
Total estimated impact on pollution numbers			**3-6**				

Case study

Increasing controls at Littleton WTW

We have remote monitoring in place across our treatment works with data outputs collated centrally and presented on dashboards. These dashboards provide a comprehensive view of various parameters and enable corrective actions to be taken before an issue occurs, such as a breach of a permit limit.

A review carried out at Littleton treatment works identified via the performance dashboards that the site was on occasion nearing the discharge volume limit of 300m^3 per day. To ensure that the site remained permit compliant the site pump configuration was investigated, which identified a need to upgrade part of the control system. This investment has increased the monitoring capability onsite and enabled automation of operation based on volume, meaning pumps will stop before the total daily volume is reached.

Distribution network

Our detailed interventions

Ensuring your water supply is safe and reliable is our top priority and by keeping our water distribution network stable we can help prevent failures and reduce the risk of pollution. One of the ways we achieve this is by maintaining consistent water pressure across the network, which both helps to prevent pipe bursts and reduces water lost through leaks.

We use a 'calm' network management approach, which means our experienced technicians use specialist equipment like pressure-reducing valves and air valves to keep everything running smoothly. We also carry out proactive work, such as regular replacement of at-risk assets, to further minimise the risk of failure.

All our technicians receive comprehensive training at our dedicated Network Training Centre in Exeter. This training centre includes a fully simulated network where staff learn how to safely operate and maintain assets. We are always seeking ways to improve, and we will be introducing new training courses with a greater focus on environmental protection for everyone in our water business teams.

We understand how important it is for customers to have an uninterrupted water supply so if a burst does occur our teams respond swiftly to restore service. When this happens, we also take special care to protect local rivers and streams, for example, by preventing water flows from reaching them, using hay bales to trap mud, or using special tablets to remove chlorine from treated water before it reaches a watercourse.

Our teams are on call 24/7 ready to repair bursts across the clean water network whilst meeting our high standards for safety, quality, and environmental protection. This ensures that our customers receive the best service possible and the risk of harm to the environment is minimised.

Replacing or upgrading old water pipes helps reduce leaks, improve water clarity, and lowers the risk of failures. This ensures you receive a better service and helps to prevent pollution incidents linked to our network. We have committed funding to replace the highest-risk mains by 2030, and progress is monitored by our regulator, Ofwat.

We carefully assess where to invest in pipe replacement to get the best value, taking into account multiple factors such as burst history, the risk of supply interruptions, leakage levels, and the risk of pollution if a pipe were to fail. This ensures we make the most positive impact on your service and the environment.

Measures taken to maintain distribution network in 2025

Measure	Description of actions	Scale of actions	Estimated (pollutions prevented)	Root cause addressed	Recent pollution incident performance issues identified in the DWMP	Delivery status
Staff training (asset type specific)	There are training programmes in place across WSN including general and role / asset specific. Network technicians receive full training in the distribution network and will undertake the calm network course at the dedicated network training centre at Pynes WTW in Exeter Network technicians currently receive role specific training which includes environmental risks, including silt mobilisation and potable (chlorinated) water entering watercourses. The risk of pollution from bursts occurring is reduced by using network management techniques, this includes calm network training which has been delivered to all SWB technicians.	100% technicians receive calm network operation training	1-3	Human Error	Pollution risk	Pre-existing

Measure	Description of actions	Scale of actions	Estimated (pollutions prevented)	Root cause addressed	Recent pollution incident performance issues identified in the DWMP	Delivery status
Remedial capital asset improvements	Investment in the distribution network covering planned replacement / rehabilitation and reactive repairs.	As defined by risk analysis across asset base	1-2	Age and deterioration	Pollution risk	Delivered in year
Pressure calming	Pressure calming is utilised where possible across the network to reduce the level of leakage. The reduction in pressure also lowers the risk of pipe failure and the rate of discharge if a pipe does fail. Pressure calming includes a programme of pressure reducing valve servicing and maintenance, so they deliver the expected benefits. Air valve installation and maintenance forms part of the pressure management strategy	Network / modelling assessment being progressed for pressure management	1-2	Pipe failure due to high pressure	Pollution risk	In progress
Contractor controls	Specialist contractors undertake repairs on the network and have robust measures in place to prevent pollution Pollution control equipment is available to network inspectors and repair gangs	100% technicians receive training on environmental protection measures	1-3	Potable water run off	Pollution risk	In progress
Total estimated impact on pollution numbers			**4-10**			

Planned additional measures to distribution network in 2026

Additional measures	Description of actions	Scale of actions in next calendar year	Estimated impact in next calendar year	Root caused addressed	Recent pollution performance issues identified in the DWMP	Start date	Completion date
Staff training (asset type specific)	There are plans for a new 'Own it' training programme started in 2026. This will cover all aspects of network operation as part of the CGS programme Calm network training at the network training centre will be extended across WSN including technicians in the Bristol and SES regions	50% technicians will go through 'own it' in 2026	1-2	Human error	Serious pollution incidents	Jan-26	Dec - 26
Remedial capital asset improvements	Planned rehabilitation is split out over the years 2025 to 2030. Water mains will be rehabilitated on a risk reduction basis including leakage, discoloration, loss of service and environmental protection	Mains replacement / rehab is risk based and complexity / cost dictates the Km completed	1-2	Age and deterioration	Serious pollution incidents	Jan-26	2030
Pressure calming	Development and delivery of a programme of pressure reducing valve servicing and maintenance. This will ensure that the valves are working effectively and so deliver the expected benefits from pressure calming – reduced leakage, lower risk of busts etc.	100% network valves will be assessed in 2026 Maintenance will be completed on a risk basis, underpinned by modelling outputs	1-2	Pipe failure due to high pressure	Serious pollution incidents	Jan-26	Dec - 26
Contractor controls	Contracts with providers for network incident response including KPI's will be reviewed. Current and future expectations for Environmental protection will be included in the discussions	100% of network contractor KPI will be reviewed	1-3	Potable water run off	Serious pollution incidents	Jan-26	Jun-26
Total estimated impact on pollution numbers			**4-9**				

Case study

Network incident management process enhancement

Recently we undertook a review of Bristol Water processes for managing network events such as leaks and bursts, specifically in relation to impact and reporting to the EA.

A procedure was developed for 'unplanned discharges' with the objective of ensuring that any potential pollution was identified and self-reported in a timely manner. The procedure also outlines steps that should be taken to mitigate impact on the local environment.

Collaboration

The procedure was developed in collaboration with the EA which enabled us to develop documentation that reflected regulatory reporting requirements as well as strengthening relationships with local regulatory contacts.

Evidence gathering

We recognise that gathering evidence during an event is valuable to both the EA for assessing impact and internally so we can continue to improve our pollution response. We have standardised the data collection method which is triggered where a potential pollution risk from a burst or leak has been identified.

This ensures that key information is gathered routinely including photographs, evidence of pollution mitigation actions and an assessment of any potential impact on the environment. The information is then provided to the EA as part of the event feedback process, highlighting the cause of the event, how we reduced impact on the environment and actions taken to stop the pollution and prevent a recurrence.

Continual improvement

Since the unplanned discharge procedure was first developed, we have undertaken regular reviews learning from actual events and making improvements where necessary. A good example of this is cross-functional collaboration across different functions in the business. Scientific Services who sit in the Water Quality team have supported our Network colleagues by providing training on watercourse sampling, including liaising with contracted Lab Services to expedite the analysis of samples and publishing results for use in regulatory reports.

Benefits

The development and refinement of this procedure has been beneficial in a number of ways including:

- Improved field operator ownership. Identifying and mitigating environmental impact when a leak or burst has caused watercourse ingress is actively completed by Inspectors and reported quickly to our Incident Officer. This is evidenced by our positive self-reporting figures, from 2023-2025 we have continually been well above the 80% self-reporting target set out within WISER expectations.
- The development of documentation that supports procedure implementation such as our data collection form has enabled the development of consistent submission of impact evidence to the EA. In 2025, Bristol Water submitted an impact report for all of the events across our Network, which demonstrates both engagement from the operational teams and awareness of the possible impact on the environment from our operations.
- Enhanced site practices, including prioritising repairs of burst and leaks that may be impacting the environment. We have also focused on trying to reduce recurrence by using different repair strategies where circumstances allow.

Case study

Service reservoir discharge compliance

We have established a senior management led compliance task force to oversee projects across our asset base designed to reduce the risk of permit exceedances.

There is a service reservoir at Maesbury which is permitted to discharge sample water as long as the chlorine has been neutralised so there is 'no trace present'. As part of the site compliance review it was identified that dechlorination was taking place in an existing chamber which was not optimal for consistent removal or efficient removal.

To address this a cross functional team was established to develop a suitable solution, which was agreed as a dedicated dechlorination chamber. This was specifically designed to increase the contact time which both reduces the amount of chemical required in the process and provides a more consistent removal of chlorine from the discharge. This installation has been successful, and we are working across sites to see where a similar solution could provide benefit.

Case study

Distribution network training

The provision of clean and safe drinking water to our customers means that our operational teams face many challenges, including the control and management of our distribution network.

To ensure that our people can carry out their roles safely whilst reducing the risk of impacting customer services or the environment it is imperative they are provided with high quality and effective training.

To deliver this training WSN made a significant investment constructing a state-of-the-art network training facility at Pynes in Exeter. Additionally, the centre provides opportunities for technical innovation and collaboration with other stakeholders across the water industry

The purpose-built training rig is designed to develop understanding of Calm Network methodologies and how transient surge within the water distribution network can cause considerable damage. The facility demonstrates how these can be avoided or reduced by operatives, technicians, and other non-water industry network users by modifying traditional distribution network valve and hydrant operational practices.

Delivering network training to technicians across WSN is the primary focus of the centre, with the rig providing hands-on experience of how their actions can affect the system operation. We have also extended this training out to Partner contractors and suppliers who interact with our network plus other water utility companies who seek to utilise the benefits of this excellent facility.

The current course offering covers multiple aspects of the distribution network and is helping to protect assets, service to customers and the environment. The courses include:

- **Networks Awareness** – Basic understanding of Water Treatment and Distribution
- **Calm Network Operations** – The safe and controlled operation of valves and hydrants to avoid risk of transient surges and potential environmental impact.
- **Basic Pressure Management and Control Valves** – Understanding the importance of pressure management within a network, how a PRV works to provide that control and basic fault finding and resolution.
- **Instrumentation Training** – Training Water Treatment Technicians on how to use the monitoring instruments. Focusing on process control and water quality analysis, providing real-time control over the chemical dosing system.

How measures drive pollution performance

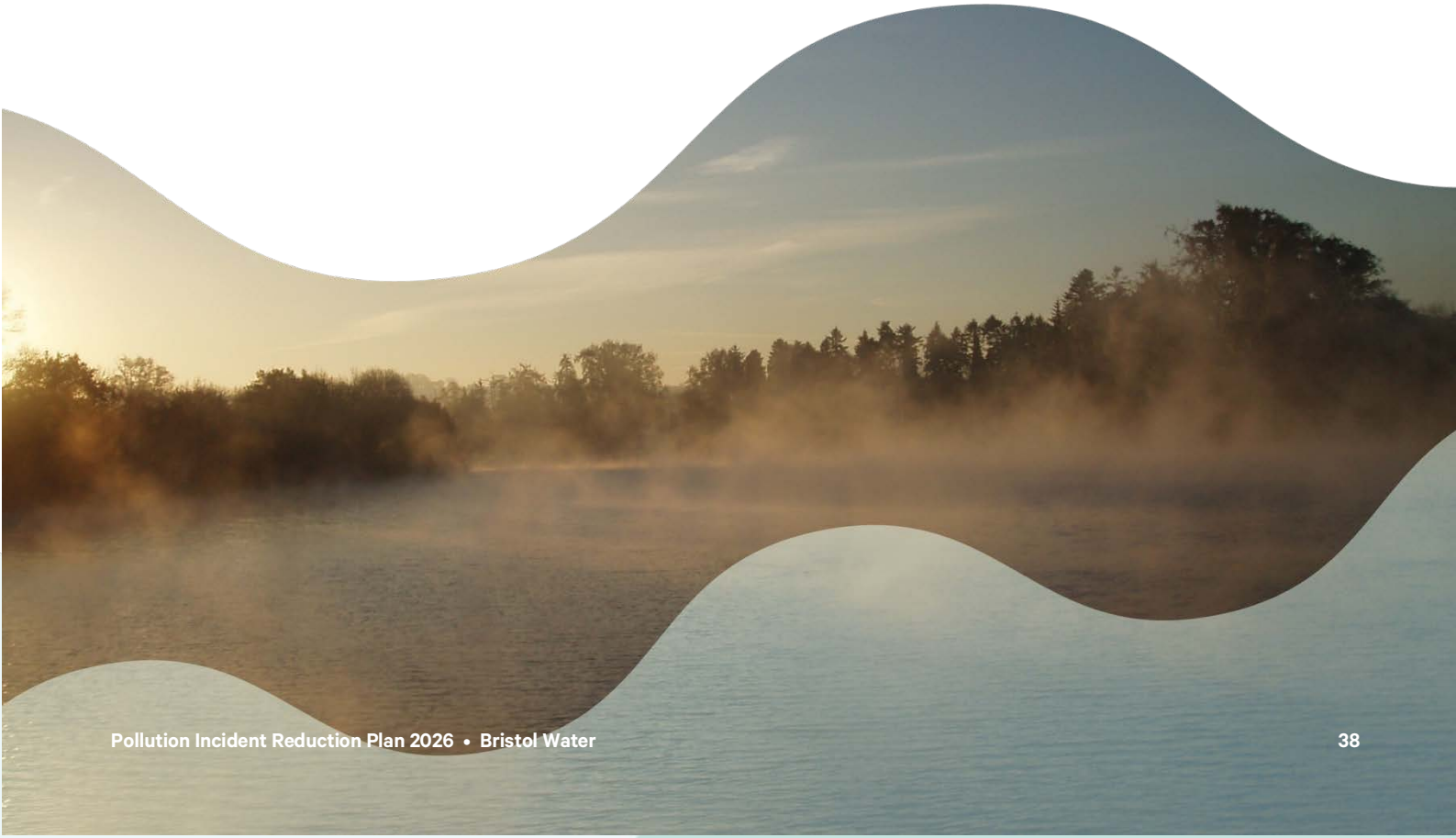
The measures set out in this plan are designed to tackle the root causes of pollution incidents and deliver sustained improvements in environmental performance. By promoting a clean, green, safe culture along with enhanced proactive maintenance and targeted asset upgrades we are confident that pollution risk will be reduced across our clean water assets.

Expected impact on pollution reduction

Based on our assessment of performance in 2025 we estimate that pollutions avoided were in the range of 11 to 23 and our planned interventions in 2026 will provide a benefit of between 11 to 25. Interventions will be targeted at the root causes of pollution events, and we are confident that that our approach will reduce the risk of harm to the environment. This is the first year of the PIRP and as our initiatives mature, we will be able to improve the accuracy of the pollution reduction estimation.

Confidence and uncertainty

Whilst we are confident these measures will deliver meaningful improvements, external factors may influence the number of events in Bristol Water. We are committed to working closely with the EA, continuing to provide transparent reporting and working to quantify more accurately the impact of our interventions.



Governance

Our Pollution Incident Reduction Plan is governed through a robust framework to ensure its effectiveness and continuous improvement.

Our pollutions plan forms a key part of our clean water activities. It has and continues to be one of our strategic priorities and this plan has been developed within our Water Services Business Unit, led and approved by the appointed Managing Director.

The approach we have taken in developing our plan and key elements of this have been considered at the Executive and Board level and we will continue to report our pollutions performance as well as progress against the plan to the Executive and the Board.

Our governance approach is adaptive, allowing us to learn from delivery experiences and lessons learned. This enables us to maximise the improvements we make and ensure that our efforts are aligned with our overall environmental goals. Regular updates and transparent reporting are integral to our governance strategy, ensuring accountability and fostering trust among stakeholders.

To further strengthen our governance, the Executive, and through to the Board, will continue to review progress, address challenges and identify opportunities for improvement. Additionally, we will continue to engage with other water companies, experts and stakeholders to gain valuable feedback and ensure our plan remains aligned with best practices and regulatory requirements.

By maintaining a dynamic and inclusive governance structure, we are committed to enhancing the natural environment for future generations.

The whole of the Bristol Water team are focused on achieving these improvements to the environment that we all love and share.

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