



**The Royal Society for the Prevention of Accidents**  
Leisure Safety Team

Consultation response

**The Department for Environment, Food and Rural Affairs**  
**Implementation of the revised Bathing Water Directive**

Peter Cornall  
February 2008

**RoSPA Response to revised Bathing Water Directive consultation:**

The Royal Society for the Prevention of Accidents is an accident and injury prevention organisation. Our mission is to 'save live and reduce injuries'. RoSPA currently sits on the UK Blue Flag jury and amongst the Leisure Departments work we carry out public safety audits of beaches and provide expertise in the development of beach safety information.

**Question 1:** Bearing in mind the cost and benefit implications, do you think that England and Wales should aim to do more than the minimum that the rBWD requires (scenario 2 (note: includes proposals in scenario 1A/B)) by 2015?

*Yes. Safe public access to the coast, beaches and subsequently bathing waters is extremely important in England and Wales. As a nation we should be doing more to encourage use of the coast and sea for recreation and promoting tourism. Environmentally we need to be more aware of the water quality around our coast and inland waters.*

**Question 2:** If England and Wales are to go beyond the minimum requirements of the rBWD should the focus mainly be on increasing/maintaining the number of 'excellent' bathing waters with the potential for achieving a Blue Flag (scenario 2)? If not, which types of bathing waters should be targeted?

*Yes. Primarily we should do our utmost to protect the excellent and good water quality bathing waters, as these have been those promoted as the best places to swim and in simplistic terms the safest places to swim.*

**Question 3:** Should the Government and the Environment Agency continue the development of the prediction and discounting system with a view to using it at a limited number of bathing waters to help achieve the minimum standards required by the rBWD (scenario 1B) by 2015?

*Yes. As many water sites have variable water quality, that is usually worsened by known factors, increased use and more informed use and exposure to varying water quality of bathing waters could be possible if the prediction systems could be improved. We need beach visitors to be risk aware not risk adverse and beach operators need the tools to present information that allows an informed choice and maximises the opportunities for access to bathing waters when there is no significant health risk.*

**Question 4:** If the prediction and discounting system can be used to help meet the minimum requirements of the rBWD, who should help meet these costs? (Please list those who should be expected to help fund the system).

*Primarily the polluters, but if the performance of those empowered with enforcement and prosecution is so poor that it has little deterrent on those that transgress then they should be financially accountable to some extent as well.*

**Question 5:** If the prediction and discounting system can be used to enable a bathing water to obtain a higher than 'sufficient' classification, for example, to achieve the classification needed for a Blue Flag award, who should help meet these costs? (Please list those who should be expected to help fund the system).

*Those that can identified as being responsible for polluting the bathing waters should pay ostensibly but beach operators who derive a benefit from increased beach use should contribute to the costs of active beach management and controlling exposure to variable water quality.*

**Question 6:** Do you agree that by 2012 the vast majority of beach operators will have included the bathing water quality information on their beach signage, for example, during routine sign replacement and updating, at minimal cost? If not, why not? (Beach operators – could you please list the bathing waters you control and indicate whether your bathing waters currently have beach signage).

*Yes. If they are informed of what they need to do as soon as possible and pressure is applied to ensure that they do.*

**Question 7:** Do you support our proposals to develop the information on signs to provide bathers with advice to help them avoid bathing during 'poor' water quality? If not, why not?

*Yes. We need to create an environment whereby beach users can make informed choices about their exposure to poor water quality, evidence from the MCS suggests a large number of people do suffer ill health as a result of exposure to poor water quality each year.*

**Question 8:** Are you content with the Government's proposal not to consult again on amendments which will need to be made to the Regulations post March 2010, which will require local authorities and

private controllers to use the signs or symbols proposed by the Commission and adopted by the EU through the Directive's committee procedure? If not, why not?

*Yes. Provided that they are developed inline with current best practice and comply with relevant UK and European standards.*

**Question 9:** The Government's proposals assume that the rBWD will apply to the existing list of bathing waters. Do you think that any waters need to be added to, or removed from the current list of bathing waters? If yes, please give reasons.

*More should be added. Pressure to swim at primarily inland water sites will increase for a variety of factors, so the stock of inland water bathing sites will need to be increased. Compliance with the rBWD should make it easier for site operators to allow such activity.*

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