

Consumer Scotland

Draft Workplan for Energy, Post and Water

Overview

General Comments

Thank you for the opportunity to comment on Consumer Scotland's draft workplan. We are supportive of the proposed cross sector and water sector areas of focus outlined in the workplan and we look forward to continuing our productive working partnership in exploring these issues.

Detailed Response

1	Question: Are these appropriate cross sector consumer issues to focus on in our work to improve outcomes for consumers in Scotland?
In the cross-sector issue of net zero, there is also a role that Consumer Scotland can play in shaping and understanding the impact of policies that are driving organisations to deliver the outcomes desired by the Scottish Government, using the insights it gains through its customer engagement.	
2	Question: Would you recommend the addition or removal of any cross-sector issues of focus?
We note the wider consideration of ethical regulation frameworks within the water wholesale sector, but this could also be an area of focus across sectors, including sharing of ethical regulation approaches.	
3	Question: Are these the appropriate energy issues to focus on in our work?
No response	
4	Question: Would you recommend the addition or removal of any energy issues?
No response	
5	Question: Are these appropriate post issues to focus on in our work?
No response	
6	Question: Would you recommend the addition or removal of any post issues?
No response	
7	Question: Are these appropriate water issues to focus on in our work?
<ul style="list-style-type: none"> • These proposed areas are key for the Scottish water industry to work on together and will benefit from Consumer Scotland's focus and insights. 	

- To ensure clarity of what is expected, with reference to the title, “Adapting the use of water and wastewater in homes to tackle climate change” page 19-20: The text clearly calls this out as water use and the use of the wastewater system rather than use of wastewater. The title alone suggests looking to adapt how people use wastewater rather than the wastewater system. Some readers may think that it is starting to refer to effluent reuse within a property.
- From a wholesale perspective we are supportive of objective to embed a fair and ethical framework of regulation and practice that delivers better outcomes for non-household customers. Citizen Advice Scotland's involvement in chairing the COVID measures working group and Senior Stakeholder Group has been particularly helpful.

8	Question: Would you recommend the addition or removal of any water issues?
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We have no suggestions on additions or removals on the work plan, rather some suggestions on how these issues are being approached

- The remit of the workplan areas “Adapting to cope with flooding caused by climate change” and “Adapting the use of water and wastewater in homes to tackle climate change” is focused on customer engagement. It would be beneficial for Consumer Scotland to identify the opportunities where it could inform policy development e.g. building legislation, and where it could engage more widely with other parties e.g. home builders, local authorities with a view to enabling and encouraging the right behaviours from customers as well as organisations.
- There is some potential duplication between the outcomes of the areas “Adapting the use of water and wastewater in homes to tackle climate change” and “Adapting to cope with flooding caused by climate change”. Some clarity is needed to tease out the distinct objectives for these areas, otherwise they could be combined.

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