Dear Minister, December 19th, 2014

Re Bad Water Debt Regulations

Community Housing Cymru supports the recent Bad Water Debt Regulations introduced by the Water and Sewerage Information Regulations 2014, which is permitted by Section 144C of the Water Industry Act 1991 as amended by Section 45 of the Flood and Water Management Act 2010. However, we are requesting that you consider changing the proposed introduction date of 1st January 2015 to the 1st April 2015 to allow our membership to better prepare and more importantly communicate the consequences of the regulations.

The original consultation and summary responses[[1]](#footnote-1) noted that CHC made the following recommendations:

* We recommend that a full consultation is undertaken with landlords to establish the impact of the implementation of the proposals on their businesses and associated costs.
* We recommend that a better understanding is gained around necessary adjustments to IT systems and the associated costs.
* Appropriate and detailed guidance must be issued to landlords.

Welsh Government gave the following response to CHC’s recommendation:

*Community Housing Cymru requested that a full consultation is undertaken with landlords, to establish the impact of the implementation of the proposals on their businesses and associated costs. They also recommended that the RIA be expanded to gain a better understanding around necessary adjustments to IT systems and the associated costs. They asked that appropriate and detailed guidance be issued to landlords.*

*Welsh Government response: The Welsh Government considers that a regulatory approach will have the most impact in tackling the issue of non-payment of water charges at non-owner occupied properties. However, we will review the timing of this approach and consider the introduction of a transition period to enable engagement with landlords. We will work with water companies and landlord associations to ensure that the process for submitting information is as simple and quick as possible.*

Given that the regulations were made in the National Assembly for Wales on December 4th and the little time our members have had to gear up for these new regulations, we would be grateful for a consideration of this proposed new implementation date.

Yours sincerely,



Stuart Ropke, Chief Executive of the Community Housing Cymru Group

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1. http://wales.gov.uk/docs/desh/consultation/140826-bad-debt-in-the-water-industry-summary-of-responses-en.pdf [↑](#footnote-ref-1)