

From: "Martin Christmas"
Sent: Fri, 17 Apr 2026 14:37:33 +0000
To: "PFA Honorary Secretary" <hon.sec@pickeringfishery.co.uk>
Cc: "Sue Longstone" <sue.longstone@environment-agency.gov.uk>
Subject: 9th April 2026 PFA meeting follow up
Attachments: LIT 16946 - How the Environment Agency permit water discharges.pdf, LIT 11227 - Incidents and their classification common incident classification scheme (CICS).pdf

Martin,

I have pulled together some of the information you asked about when we met with Sue last week.

Advice on control of *Ranunculus* sp.

I ran your "ladder" idea for lifting ranunculus clear of the water past Richard Jennings. He seemed to think that was an acceptable way to chemically treat the plant. I asked about terminology and he suggested "problem plant" rather than non-native, for a species that has not got an established county record but is native to the UK and is causing a nuisance. Non-native referring to plants from outside the UK with no county records. Apparently on the Hull headwaters it has been referred to as Feren's weed after Thomas Feren's MP who was instrumental in its introduction there.

CICS

I am not sure if you have the latest version of our common incident classification scheme. I have attached it in case you don't, but please note the "uncontrolled when printed"; i.e. it won't reflect any changes to the reference document made after printing.

I just wanted to highlight that impacts to fish (not just salmonids) are only part of the incident classification process. Absence of salmonid species does not preclude the watercourse from suffering a Category 1 or 2 pollution if the assessment meets the criteria for water quality (for example as measured with field instruments) or any of the other sub sections listed on page 48.

Note the special mention of Bullhead and its conservation status in the fish section.

I am in no way suggesting that streams with an absence of salmonids where the habitat suggests they should present should be tolerated, and as fishing club its right you focus on the species of importance to your members. However, the current CICS does provide a standardised way of classifying a range of environmental impacts and doesn't just rely on salmonid fish kills.

Assessing location of discharges

With regard to the location of Pickering STW outfalls I have attached our internal guidance for assessing water discharges. Obviously, this wasn't in place in the 1930's but gives an overview of how we assess applications at the moment. See attachment.

Relevance of Cat 3 incidents to the EPA

The EPA Total Incident metric is a standardized measure used by environmental and economic regulators to determine how many pollution events a water company causes relative to the size of its network. It directly influences financial penalties through two

main regulatory channels: Ofwat's performance incentives and the Environment Agency's (EA) enforcement powers.

1. Understanding the Metric

- Categories 1 to 3: The metric counts everything from "minor" (Category 3) to "major" (Category 1) incidents.
- Normalisation: Because companies vary in size, the total number of incidents is divided by every 10,000 km of sewer the company manages.
- Rating Thresholds: Performance is graded as Green (on track), Amber (below target), or Red (significantly below target):
 - Green:

incidents per 10,000 km.

- Red:

incidents per 10,000 km.

2. How it Triggers Financial Penalties

The financial impact is calculated based on how far a company misses its specific "Performance Commitment Level" (PCL).

House of Lords Library +1

- Ofwat Underperformance Payments (ODIs):
 - Failure to meet the PCL results in an automatic "underperformance payment" (a fine).
 - Draft determinations for 2025–2030 suggest penalties of approximately £366,000 for every Category 3 incident and £2.1 million for every Category 1 or 2 (serious) incident.
- Environment Agency Civil Penalties:
 - The EA can issue Variable Monetary Penalties (VMPs) for individual incidents.
 - Recent legislative changes have removed the previous £250,000 cap, allowing for unlimited financial penalties for serious pollution.
- Star Rating Impact:
 - A company's total score across all EPA metrics determines its 1 to 4-star rating.
 - Poor ratings (1 or 2 stars) can lead to restricted dividend payments to shareholders and blocked executive bonuses.

3. Case Example: Yorkshire Water

In 2024, Yorkshire Water recorded 13 serious pollution incidents (Category 1 and 2), one of the highest in the sector. This performance, combined with a "Red" status on the total incidents metric, contributed to their recent £40 million redress package agreed upon with Ofwat.

[Yorkshire Water EPA data report 2024 - GOV.UK](#)

Transferring West Drain into Oxfolds

Still following this up with the water resources people.

Hope that helps

Martin Christmas

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Verdana is a dyslexia friendly font



Pronouns: he/him ([why is this here?](#))

My Name is - Martin Christmas

Phonetically - 'mɑ:tɪn 'krɪsməs