

Seamus Logan MP
House of Commons
(via email)

28 October 2025

Dear Mr Logan,

Thank you for your email of 5 September to the Acting National Statistician¹ regarding comments by the former Secretary of State for Environment, Food and Rural Affairs, that drew comparisons between England and Scotland's water industry regulation.

I respond on behalf of the UK Statistics Authority's Regulation Committee, which oversees the independent regulator, the Office for Statistics Regulation (OSR)². Whereas normally the Chair of the Authority would respond to your concern, she has instead asked me to respond in her place, to avoid the risk of a perceived conflict of interest with another role³.

Judgements about regulation of the water industry and broader environmental policy are rightly for you and your colleagues in the UK Parliament and devolved assemblies to consider. However, we have looked at some of the statements made as part of our role enforcing the Code of Practice for Statistics⁴; a full list of these is enclosed in Annex A.

In brief, we consider that these statements lacked enough transparency about their sources to be verified, and that the broad evidence did not support them. Without appropriate discussion of the limitations of some of the more specific figures quoted, they run the risk of misleading the public.

As you point out, the then-Secretary of State said several times that water pollution and water quality are worse in Scotland than in England. He made these claims repeatedly in the House of Commons, as well as in broadcast interviews and online.

¹ [Recent Usage of ONS Data by The Rt Hon Steve Reed MP](#), Seamus Logan MP (Published by UK Statistics Authority)

² [Regulation Committee](#), UK Statistics Authority

³ [Interventions Policy](#), UK Statistics Authority

⁴ [Code of Practice](#), UK Statistics Authority

We also note his letter of 24 July to Stephen Flynn MP published on X, which cites a range of statistics in response to the dispute over his claims^{5,6}.

The table of figures appended to the letter is not relevant to water pollution and water quality, but in the body of his letter he further claimed, without providing a source, that in 2023-24, there were 35.8 pollution incidents per 10,000km of sewerage network in Scotland, and 35.4 in England and Wales combined.

The Department for Environment, Food and Rural Affairs told us that its source for Scotland was an analysis of Scottish Water's annual report⁷, and for England and Wales, Ofwat's water company performance report⁸, wherein pollution incident rates are broken down by company. The sector average given for both England and Wales combined is 35.42. These water companies' territories do not neatly match national boundaries, so it is not simple to calculate pollution incidents in England alone.

Underlying regulatory data on pollution incidents are not yet available for Wales or Scotland, although an Environmental Standards Scotland report⁹ claims Scottish Water has a lower incident rate (36) than English water companies (41), when including incidents from water supply assets. However, there are many differences in monitoring and reporting of pollution incidents data, so the Independent Water Commission (IWC) cautions against making these comparisons between countries. It is important to provide this context when referring to them in public debate.

The IWC concluded its review of the water sector on 21 July, and in its final report¹⁰ there are several sets of statistics directly relevant to water quality and other environmental data. It would have greatly improved public understanding to draw upon these figures, given their relevance, quality, and importance to the Government's stated ambitions¹¹. The figures show broadly that Scotland has a similar or better share of bathing and surface water sites that meet good or excellent standards for water quality. The OSR has published a further analysis of this topic, which I enclose in Annex B.

The Authority expects that ministers take care to avoid using data that is overly selective or missing appropriate context. Based on the statements made without discussion of their context, sources, and limitations, there is the potential for people to be misled about English and Scottish water quality and infrastructure. As former

⁵ <https://x.com/SteveReedMP/status/1948728494973661243>

⁶ <https://x.com/SteveReedMP/status/1948731939063525540>

⁷ p9 and p28 2023/24 [Annual Report and Accounts: Performance and Prospects](#), Scottish Water

⁸ p24 [Water company performance 2023-24](#), Ofwat

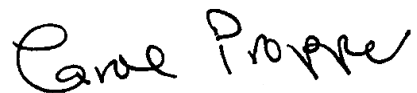
⁹ 13.9, p51 [Storm overflows – an assessment of spills, their impact on the water environment and the effectiveness of legislation and policy](#), Environmental Standards Scotland, September 2024

¹⁰ pp297-300 [Final Report](#), Independent Water Commission

¹¹ [Environment Secretary Steve Reed: Response to the Independent Water Commission's final report](#), 21 July 2025

Chairs have said, omitting this kind of information can damage public trust in the data, so we encourage those speaking on behalf of Government to ensure statistical statements are presented clearly and transparently, in a way that supports public understanding.

Yours sincerely,

A handwritten signature in black ink that reads "Carol Propper". The signature is written in a cursive, flowing style.

Professor Dame Carol Propper
Chair of the Regulation Committee

ANNEX A

- “[...] you were just hearing about Scottish Water, they’re nationalised, pollution in rivers in Scotland is worse than in England”
[Sunday with Laura Kuenssberg, BBC One](#), 20 July
- “In Scotland they have a nationalised water company, but pollution levels in Scotland are worse than they are in England”
[Channel 4 News](#), 21 July
- “Scotland has a nationalised water company... and water pollution is worse than in England as a result”
[House of Commons](#), 21 July and republished [online at X.com](#)
- “... under the nationalised model in Scotland, pollution is worse, not better.”
[House of Commons](#), 21 July
- “Official statistics [...] show several areas where Scotland’s water quality underperforms relative to England.”
[Letter to Stephen Flynn MP](#), 24 July
- “There were 35.8 incidents per 10,000km of sewer in Scotland versus 35.4 incidents per 10,000km of sewer in England and Wales reported in 2023-24.”
[Letter to Stephen Flynn MP](#), 24 July
- “OFFICIAL: The SNP are managing water pollution in Scotland even worse than the Tories did in England”
[@SteveReedMP on X.com](#), 25 July
- “Levels of pollution in England are bad enough, but under the SNP in Scotland they are even worse”
[House of Commons](#), 4 September
- “I have published the data and I stand by it: pollution under the SNP in Scotland is even worse than it was under the Tories in England.”
[House of Commons](#), 4 September

ANNEX B

OSR statement on statistics concerning aspects of water in Scotland and England

This statement provides information about statistics concerning aspects of water in Scotland and England that were presented in July 2025 in:

- A letter and accompanying table sent on 24 July from Steve Reed MP – the Secretary of State for Environment, Food and Rural Affairs at the time – to Stephen Flynn MP ([published on X](#) on 25 July). The Secretary of State sent this letter to Stephen Flynn in support of statements made in [the House of Commons on 21 July](#), which compared Scotland and England in terms of water pollution, and in the context of nationalised and privatised water company ownership models.
- The [Independent Water Commission \(IWC\)'s final report](#) (published on 21 July). This report contains water quality statistics that were directly relevant to the debate, which were flagged in a [22 July letter](#) to the Secretary of State from Gillian Martin MSP, Cabinet Secretary for Climate Action and Energy.

This statement focuses on statistics relating to the following aspects of water:

- Sewerage pollution incidents
- Storm overflow monitoring
- Household water usage
- Water leakage (proportion of supply)
- Water leakage (litres)
- Water meter coverage
- Surface water quality
- Bathing water quality

Sewerage pollution incidents

Statement: “There were 35.8 incidents per 10,000km of sewer in Scotland versus 35.4 incidents per 10,000km of sewer in England and Wales reported in 2023-24.”
[24 July letter]

OSR view: While the 24 July letter did not provide a source for this statistic, we were able to identify how the figures for Scotland and for England and Wales were produced. However, several caveats limit the quality of this statistic, particularly for comparing between countries. The substantial caveats – together with the small difference between the estimates – led to our view that this statistic is not of a sufficient quality to use as a basis for robust conclusions. We conclude that there is

not suitable evidence to allow for a meaningful comparison of the number of sewerage pollution incidents in Scotland and in England and Wales in 2023-24.

The statistic above was presented in the 24 July letter, although the letter did not provide a source for the statistic. Defra informed us that the figure for England and Wales was taken from [Ofwat's Water company performance report 2023-24](#) (p24), and the figure for Scotland was calculated using figures from [Scottish Water's 2023-24 report](#) (p3 and p28).

While we were able to identify and recalculate the sewerage pollution incidents statistic from these sources, there are several caveats to consider when comparing countries on this basis. We summarise these caveats below:

- The IWC report did not include comparisons of pollution incidents because of challenges in comparing nations due to differences in monitoring and reporting such incidents. As indicated in the storm overflow monitoring statistic presented in the 24 July letter (see next section), England and Scotland differ substantially in terms of the proportion of monitoring coverage. An [Environmental Standards Scotland \(ESS\) report](#) also highlights that the figures for England and Wales are reported by calendar year, while figures for Scotland are presented by financial year. We also identified that the sewer length data used in the calculations were from [2018 for England \(table 5.2.9.\)](#), and from the end of the [2023-24 financial year for Scotland \(table D6\)](#).
- The statistic presents a figure for England and Wales combined, although England and Wales have different models of water company ownership. As the 24 July letter was produced in the context of nationalised and privatised water company ownership models – comparing Scotland and England, respectively – it could be viewed as inappropriate to include data for Wales in this statistic. A figure for England could have been calculated from the [individual water company data reports](#) published by the Environment Agency. However, there are other difficulties to consider in distinguishing England and Wales in this way, as companies in Wales serve small parts of England, and companies in England serve small parts of Wales.
- The figure for England and Wales appears to only include incidents from sewerage assets, and not from water supply assets. However, the figure for Scotland appears to include incidents from sewerage and water supply assets. As the [Scottish Water report \(p28\)](#) suggests that not all ('most') incidents occurred in the sewerage assets, it is possible that the figure for Scotland is an overestimate. The ESS report highlights the need for more transparent and detailed data for Scotland concerning these incidents, which

would enable incidents from sewerage and water supply assets to be considered separately.

Storm overflow monitoring

Statement: “Storm overflow monitoring coverage in Scotland was 28% in 2024, while England has 100% coverage.” [24 July letter]

OSR view: The finding that England has 100% coverage, and a much higher proportion of storm overflow monitoring than Scotland, is supported. However, the extent of the difference is difficult to determine, as the figure for Scotland is approximate.

[A 2023 Defra and Environment Agency press release](#) is provided as the source for the figure for England and is also referenced in the IWC report to support the same figure. While the letter details the sources and the way in which the figure for Scotland was calculated, [a 2024 ESS report](#) notes that the figure is difficult to determine accurately. As such, the figure for Scotland should be clearly framed as being approximate.

As acknowledged in the 2024 ESS report, England and Scotland have different policies relating to storm overflow monitoring. As such, while the exact proportion of overflows in Scotland that are monitored is unclear, the finding that a higher proportion of overflows are monitored in England than Scotland is highly unlikely to change.

Household water usage

Statement: “Average household water use is also significantly higher in Scotland (178 litres per person per day), compared to England (137 litres in England).” [24 July letter]

OSR view: This statistic appears to be correct, although the source indicates that the figure for England is a combined average for England and Wales. While we identified a discrepancy between sources for the figure for England, there appears to be support for the figure presented in the 24 July letter.

[A Scottish Water strategy article](#) is provided as the source for this statistic, although this article does not provide the origin of the figures. The same article is provided as the reference for the Scottish figure in the IWC report. As stated in the article, the figure for England reflects a combined average for England and Wales (this figure is also presented on p295 of the IWC report). The figures for England and Wales are presented separately on p298 of the IWC’s report, and the figure for England is taken from [Ofwat’s water company performance report 2023-24](#) (p16). However, the figure for England on p298 indicates that water usage is 140 litres per person per

day, while the Ofwat source indicates that English companies had a one-year average usage of 137 litres per person per day. The reason for this discrepancy is unclear, although the Ofwat source supports the figure for England presented in the 24 July letter.

Water leakage (proportion of supply)

Statement: “25% of total water supplied in Scotland is lost to leakage compared to 19% in England (2023-24).” [24 July letter]

OSR view: The sources for these figures were accurately presented. While an alternative figure for England is presented in the IWC’s report, the Environment Agency figure presented in the letter appears to be more comparable to the figure for Scotland.

The IWC report presents an alternative figure for England (23%, p298), although this represents the percentage of water produced that is lost or unbilled (‘non-revenue water’). The IWC report notes that non-revenue water is distinct from the metric used for Scotland. The IWC figure also relates to a different period (2022-23), and the source is not freely accessible.

Water leakage (litres)

Statement: “Leakage, litres of water leaked per person per day (2023/24) – England 49, Scotland 84” [24 July letter]

Statement: “Leakage, litres of water leaked per household per day (2023/24) – England 118, Scotland 183” [24 July letter]

OSR view: The figures for England in these statistics actually relate to England and Wales, which is noted under the 24 July letter’s accompanying table but not in the table itself.

There are inconsistencies with how these statistics are presented in terms of relating to England alone, or England and Wales – the table’s column refers to ‘England’, while the footnotes refer to ‘data for England and Wales’.

Using the sources provided in the 24 July letter, we were able to recalculate both of the statistics (using the combined figure for England and Wales), except for the per person daily water leakage in Scotland, as the source for Scotland’s population size was not clear. As each data source presented the figures for England and Wales separately, we were able to recalculate the leakage figure for England only and found that the pattern of findings did not change substantially.

Water meter coverage

Statement: “Water meter coverage, % of all households (2024) – England 60%, Scotland 3%” [24 July letter]

OSR view: While the broad pattern of findings appears to be supported – there is higher water meter coverage of households in England than in Scotland – both figures are likely to be approximate.

The figure for England is taken from [research and analysis](#) undertaken by the Environment Agency, which states that the figure is approximate (‘around 60%’). The figure for Scotland is calculated from [a Scottish Water article](#). The article states that Scottish Water provides unmetered water supply to 97% of households in Scotland, therefore suggesting that the remaining 3% of households have water meter coverage. However, the article states that the number of households in Scotland on private water supply or supplied through a business (73,000) is approximate.

Surface water quality

Statement: “Surface water quality (achieving good or excellent status) – Scotland 66%, England 16%” [IWC report]

Statement: “Water bodies at poor or bad status – Scotland 14%, England 20%” [IWC report]

Statement: “Surface water quality achieving bad status – Scotland 3%, England 3%” [IWC report]

OSR view: These statistics indicate that a higher proportion of surface water is classified as good or excellent in Scotland than in England. The countries are more similar in terms of the proportion of surface water that is classified as poor or bad. While we identified differences between how the figures for England and Scotland were produced, the patterns of the findings are unlikely to be substantially affected.

These statistics were presented in the IWC report (p125 and p299). The sources for the figures for England were accredited official statistics. Using the sources provided for Scotland, we were able to repeat the calculations. However, we note that [the Scottish Environment Protection Agency \(SEPA\) source](#) provides figures separately for surface water and groundwater, while the IWC report combines these figures. As the figures for England only appear to relate to surface water, we are unclear why the IWC has included groundwater in the calculation of the figure for Scotland. However, we repeated the calculations for surface water alone, and found that the results do not change substantially.

The House of Commons Library published a [research briefing](#) concerning water quality in January 2025, and this briefing draws on more recent data on surface water and groundwater in Scotland (2023). We focus on the IWC report as it

compares the countries across a more similar period using the latest data for England (England 2019, Scotland 2020). However, the more recent data for Scotland indicate a similar pattern of results.

The IWC report highlights factors that could lead to differences in water quality between Scotland and England (and other countries). For example, Scotland has a considerably lower population density than England. This is important as it emphasises that water quality is affected by several factors and cannot be attributed to just one (for example, water pollution incidences).

Bathing water quality

*Statement: “Bathing water quality (good or excellent) – Scotland 87%, England 85%”
[IWC report]*

OSR view: We view this statistic to be appropriate – specifically, that Scotland and England have a broadly comparable proportion of bathing water sites that meet good or excellent standards.

This statistic was presented in the IWC report (p299), and the sources for the figures were accurately presented.

As stated above, several factors contribute to water quality status (for example, population density), so attributing water quality to any one specific factor should be avoided.