

**Independent Water Networks Limited (IWNL) Pollution Incident Reduction Plan (PIRP) – 1<sup>st</sup> April 2026**

**Chief Executive declaration**

**I hereby attest that I have personally reviewed and approved the IWNL PIRP, 2025.**

**Signed:**



**Dated: 27/03/2026**

**Title: Chief Executive Officer, BUUK**

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Section 3 of the Water (Special Measures) Act 2025 (the Act) specifies that “Each **relevant** undertaker must, before 1 April in each calendar year, prepare and publish a pollution incident reduction plan”. Section 205A (4) of the Act states that a PIRP must address in particular:

- a) the frequency with which pollution incidents have occurred during the preceding calendar year,
- b) the seriousness of those incidents and their causes,
- c) the steps the undertaker has taken to maintain any structure or apparatus comprised in its system which has been the cause of any such incidents,
- d) the measures the undertaker intends to take or continue for the purpose of reducing the occurrence of pollution incidents,
- e) the impact that the undertaker considers the measures will have in furthering that purpose,
- f) the likely sequence and timing for implementing those measures, and
- g) any other matters specified by the Minister in directions.

The following sections of this report present data relevant to each of the individual points set out in Section 205A(4) of the Act, replicated above.

In reading this report, it is important to be aware of the context in which IWNL operates. In this respect, IWNL is an independent new appointee (NAV) that provides last-mile water and wastewater network connections, primarily to new housing developments. Our networks are discrete and self-contained, which means that we do not have any direct discharges to the environment. Our only point of discharge is the one that connects our NAV assets to the incumbent network, and this is underpinned by a contractual agreement (a bulk discharge agreement (BDA)) with the relevant incumbent water company. Most NAVs do not own any wastewater treatment assets and therefore do not face any risk of sewerage overflows.

**TABLE 1: FREQUENCY AND SERIOUSNESS OF POLLUTION INCIDENTS FROM ALL WASTE ASSET TYPES IN 2025**

MONTH	CATEGORY 1 POLLUTION INCIDENTS	CATEGORY 2 POLLUTION INCIDENTS	CATEGORY 3 POLLUTION INCIDENTS
JANUARY	0	0	0
FEBRUARY	0	0	0
MARCH	0	0	0
APRIL	0	0	0
MAY	0	0	0
JUNE	0	0	0
JULY	0	0	0
AUGUST	0	0	0
SEPTEMBER	0	0	0
OCTOBER	0	0	0
NOVEMBER	0	0	0
DECEMBER	0	0	0

Table 1 above demonstrates that, during the year 2025, IWNL did not have any reportable pollution incidents in any of the three categories of the Environment Agency (EA). The categories from Table 1 are defined as:

- Category 1 – major, serious, persistent or extensive impact or effect on the environment, people and / or property or on our operations
- Category 2 – significant impact or effect on the environment, people and / or property or on our operations
- Category 3 – minor or minimal impact or effect on the environment, people and/or property or on our operations

Further information on each of these categories is available from outlined in [The Common Incident Classification Scheme \(CICS\)](#).

**TABLE 2: CAUSE OF SERIOUS POLLUTION INCIDENTS FROM ALL WASTE ASSET TYPES IN 2025**

EVENT NUMBER	REPORTED DATE AND TIME	LOCATION	SERIOUSNESS	ROOT CAUSE
NO INCIDENTS TO REPORT	N/A	N/A	N/A	N/A

As IWNL did not experience any pollution incidents during 2025 (as reported in Table 1 above) we do not have any data to report in terms of the cause of any incidents, as shown in Table 2 above.

**TABLE 3: CAUSES OF CATEGORY 3 POLLUTION INCIDENTS FROM ALL WASTEWATER ASSET TYPES IN 2025**

ROOT CAUSE	NUMBER OF CATEGORY 3 POLLUTION INCIDENTS	PROPORTION OF CATEGORY 3 POLLUTION INCIDENTS (%)
NO INCIDENTS TO REPORT	N/A	N/A

As IWNL did not experience any pollution incidents during 2025 (as reported in Table 1 above) we do not have any data to report in terms of the cause of any incidents, as shown in Table 3 above.

**TABLE 4: MEASURES TAKEN TO MAINTAIN ALL WASTEWATER ASSET TYPES IN 2025**

MEASURE	DESCRIPTION OF ACTION(S)	SCALE OF ACTION(S)	IMPACT OF THE MEASURE (CATEGORY 1 - 3 INCIDENTS PREVENTED)	ROOT CAUSE(S) ADDRESSED BY THE MEASURE	RECENT POLLUTION INCIDENT PERFORMANCE ISSUES IDENTIFIED IN THE DWMP	DELIVERY STATUS OF THE MEASURE
Implementation of proactive cleaning and maintenance	Implement routine jetting and cleaning of foul water sewers to remove silt, debris, and early blockages before they escalate.	N/A	N/A	N/A	N/A	N/A
IWNL have maintenance plans in place for its wastewater assets	All of our assets are relatively new. Regular wastewater pump station cleaning and maintenance carried out to ensure correct asset performance and resilience.	N/A	N/A	N/A	N/A	N/A
<b>Our gravity network has a condition based maintenance schedule in place. Any identified faults are promptly rectified.</b>						

Table 4 above highlights the measures we have taken to maintain IWNL’s network, which include regular cleaning in line with our defined maintenance plan. Any issues are promptly found and rectified, before they create a pollution incident.

**TABLE 5: PLANNED ADDITIONAL MEASURES FOR ALL WASTEWATER ASSETS IN 2025**

Additional measures	Description of action(s)	Scale of action(s) in the next calendar year	Expected impact of the measure in the next calendar year (category 1 to 3 incidents prevented)	Root cause(s) addressed by the measure	Recent pollution incident performance issues identified in your DWMP	Implementation start date of the measure	Implementation completion date of the measure
Customer engagement	Provide guidance through targeted communication on proper disposal behaviours (e.g., avoiding fats, oils, wipes)	N/A	N/A	N/A	N/A	N/A	N/A
<b>IWNL have maintenance plans in place for its wastewater assets</b>							
<b>We have experienced zero incidents. We have a robust maintenance program to ensure correct asset performance and resilience.</b>							

Table 5 above highlights the additional measures IWNL took in 2025 to maintain a report of zero pollution incidents. Our main measure was to provide guidance to our customers of what should, and what should not, be put down the sinks or flushed down the toilets of their homes.

**TABLE 6: SUCCESS OR FAILURE IN IMPLEMENTING THE MEASURES PLANNED IN 2025 FOR ALL WASTEWATER ASSETS**

Measures	Description of action(s)	Scale of action(s)	Planned implementation start date of the measure	Extent of implementation planned or achieved at the end of the previous calendar year		Position of implementation at the end of previous calendar year	Explanation	How to avoid repeat failure
Customer engagement	Provide guidance through targeted communication on proper disposal behaviours (e.g. avoiding fats, oils, wipes)	N/A	N/A	N/A		N/A	N/A	N/A
<b>IWNL have maintenance plans in place for its wastewater assets.</b>								
<b>We have experienced zero incidents. We have a robust maintenance program to ensure correct asset performance and resilience.</b>								

Table 6 above is intended to illustrate the success or failure of the measures we had planned to reduce pollution incidents in 2025. As we did not have any pollution incidents in the preceding year, it has not had a material impact on our performance.