

Car Wash Campaign Group

DEFRA Consultation: Proposed Changes to Powers to Restrict Non-Essential Uses of Water

The Car Wash Campaign Group (CWCG- see Annex 1) represents all aspects of the legitimate car wash industry, from manufacturers to retailers. The CWCG's members understand that drought is a serious problem in the UK and that on occasion it is necessary to restrict both domestic and commercial uses of water. However, the CWCG are disappointed that this consultation does not seek to consult on whether the existing drought regulations are effective.

The Car Wash Campaign Group has two major concerns:

- Current drought regulations are a disincentive to investment in modern, efficient car washing technology. They also undermine the manufacturers' ability to innovate.
- Automatic car washes offer an environmentally safe and water efficient way to wash your car all year round. The threat of a ban significantly reduces the viability of the businesses.

Below we have responded to the questions which are relevant to the Car Wash Campaign Group.

Q6: Do you agree with broad division of control over water use restriction?

The CWCG agrees that the Secretary of State should have control over water restrictions that affect the commercial sector. A car wash is a vital part of a forecourt business, accounting for roughly 20% of profits. The forecourt sector is currently experiencing a severe decline, with the number of forecourts reduced by 17% since 2000. Therefore, we feel that the Secretary of State is best suited to decide when and if to grant a drought order.

Q7: Have you any views on these proposed modifications to the provisions currently in the Drought Direction?

The proposed modification of the drought regulations does not address the counter-productive nature of the current system. Currently, regulations act as a disincentive for investment in water efficient technologies. As explained above, the forecourt industry is currently under pressure, and many cannot afford the risk in investing in newer, more efficient technologies. This risk is magnified by the threat of a drought order sidelining the machine for months. If car wash operators are not able to invest in machines without this risk, there is little incentive for car wash manufactures to innovate and create even more water efficient machines.

The new drought regulations need to offer incentives for car wash operators; namely placing no restriction on efficient car wash units. Ultimately, this will lead

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to more water efficient machines on the forecourt, being used all year, accumulatively saving water when compared to washing with a hosepipe. We need to encourage people to make the sensible choice when washing their car all year round and the benefits of automatic car washes over hosepipes should be considered in drought regulations.

The benefits of using an automatic car wash for the quality of water should also be acknowledged and reflected in drought regulations. Automated car washes provide an environmentally responsible way to wash a vehicle. For forecourts to install automatic car washes or even a hand car washing service in a designated bay, they have to comply with a multitude of environmental and planning regulations, such as ensuring their drainage flows into the foul sewer, where it can be properly treated. However, unregulated hand car washes do not conform and have a severe impact on the environment, because all run-offs flow straight into a surface drain or soaks into the ground (see Annex 2). In other countries the environmental importance of using an automated car wash is recognised and promoted. In Germany you can only wash your car in designated areas and there are also restrictions in France and Brisbane, Australia.

We are concerned that the proposed regulations ignore the environmental benefits of using automated car washes and send out the wrong message to consumers. This will lead to more people preferring to use hose-pipes to wash their cars at home or use an unregulated hand car wash operator all year round, believing these to be the preferable options, and this will result in a greater negative impact on the environment.

Automated car washes provide an environmentally beneficially service, which have a positive impact on improving water quality. And considered over an entire year, it is much more beneficial for water levels to have highly efficient car wash units on forecourts than banning them for a short period of time. Penalising them in times of drought is counter-productive. Drought regulations need to promote water efficient usage, and the current situation, and the proposed changes, do not offer this.

Q13: Have you any comments on the extent of the flexibility of the discretionary use ban powers proposals.

Q16: What are your views on the concept of time based restrictions?

Q17: Do you support the production of an industry code of practice? Are there other matters the code could cover?

We welcome that the Government is encouraging the water industry to use more concessions. The CWCG believes that concessions from drought regulations could be used very effectively in encouraging innovation and investment in the industry. However, we are concerned that discretions have not been used

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previously. We believe that strong guidance from the Government is required, to ensure that water companies feel confident when setting restrictions.

The Group agrees with the creation of the Water Industry Code of Practice to promote consistency. Otherwise, you could have a car wash unit that it is possible to use in most water company areas, but banned in just one. Widely differing concessions would have a huge impact on the ability of car wash operators to compete with each other. Car Wash manufacturers would also be impacted. The CWCG would strongly recommend a minimum water usage, below which all machines are exempt from restrictions, to be incorporated into the COP. However, it is important that this is not set too low so as to not discourage investment. It must be a fair reflection of current car wash technology, and we would welcome further discussions with DEFRA and the water industry on what this level should be.

If drought restrictions have to be brought in to cover all automatic car washes, time based concessions could be a successful way to allow forecourt retailers to use their car washes.

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Annex 1: The Car Wash Campaign Group is the campaigning voice of all aspects of the car wash industry. Membership includes car wash manufacturers and forecourt retailers. David Charman from Parkfoot Garage is the CWCG's spokesperson. The Association of Convenience Stores is the Group's Secretariat.

For questions concerning this submission, please contact Jennifer Brown on 01252 515001 or jenny.brown@acs.org

Annex 2: Diagram comparing the environmental impact of regulated and non-regulated car washes:

