

Marine Conservation Society position statement on:

Bathing Water Quality

Date of statement: May 2021

Geographical extent: UK

Clean bathing waters protect public health, support tourism and provide opportunities for recreation at the coast, with research showing that spending time by the sea has many positive effects on health and well-being.¹ MCS believes that all beaches and inland waters that are popular for recreation should be designated as bathing waters and appropriate measures should be taken to ensure that they have 'Excellent' or 'Good' water quality status.

In the UK over 600 coastal sites have been designated as bathing waters due to their popularity for swimming. This means that during the bathing season water samples are monitored for bacteria which show the presence of pollution from sewage and animal waste. In England and Wales, the bathing season is 15th May to 30th September and in Scotland and Northern Ireland it is 1st June to 15th September. At the end of every bathing season each bathing water is classified using sampling data from the four previous bathing seasons as either, 'Excellent', 'Good', 'Sufficient' or 'Poor'.

MCS recommends that water users choose a beach, or inland bathing water, rated as 'Excellent' or 'Good', since these standards are considered to represent a low risk of illness.² Since water quality can change daily MCS supports the use of daily pollution forecasts, both online and at the beach. Polluted coastal waters can cause water users to suffer from illnesses such as gastroenteritis and ear, nose and throat infections.² Bathing water quality below the good standard poses a minimum of a 5-10% chance of resulting in gastrointestinal illness.² 'Poor' waters are deemed to represent an unacceptable risk to the health of water users.² and are required to display a sign at the beach entrance to 'Advise against bathing'.

Since the introduction of the Bathing Water Directive (BWD) in 1976, there has been a massive improvement in UK bathing water quality, largely through improvements to continuous waste water discharges. However, issues remain at some bathing waters, particularly after heavy rain. Pollution may come from different sources, with the three main sources being: water draining from agricultural land and towns during heavy rain; sewage pollution from combined sewer overflows (CSOs); and misconnections, where homes and businesses drain waste water into surface water pipes instead of the foul sewer.

The EU Bathing Water Directive (BWD) is being reviewed in 2021 to ensure that it continues to protect public health and we urge UK governments to do the same with domestic legislation. The World Health Organisation (WHO) has produced a series of factsheets to summarise new research on bathing water pollution and public health,³ which MCS inputted to through workshops as an observer to the European Commission BWD Expert Group. MCS supports the findings of the WHO³ and will lobby to ensure that the recommendations within the factsheets are considered by UK governments. Although the WHO acknowledged that the current restriction to 'bathers' may need to be widened to consider other recreational activities in the future, MCS believe that this recommendation should be taken forward as a matter of urgency due to the high levels of additional water sports conducted at UK beaches.

We ask for the following key actions to be taken by governments of the UK, regulators and businesses to reduce sources of pollution and ensure that all bathing waters meet the 'Sufficient' standard, whilst ultimately working to achieve, and maintain, 'Good' or 'Excellent'.



Governments and environmental regulators

- To put action plans in place at all bathing waters identifying sources of pollution and measures needed to ensure that 100% meet sufficient standards, with a target of 95% meeting Good or Excellent. This should include working with the all relevant stakeholders (land owners, water companies, businesses, home owners, beach users, etc.) to ensure that pollution sources are rectified, using regulatory powers where necessary.
- To inform water users of the risks of pollution (using appropriate signage) and raise awareness of where this pollution comes from and how they can help to reduce it.
- To proactively ensure that all popular beaches and inland waters are identified and maintained as designated bathing waters.
- To require all combined sewer overflows (or storm overflows) to be monitored and for this information to be published annually, along with permit and performance indicators.
- To ensure that all combined sewer overflows (or storm overflows) are meeting their permit requirements and to use enforcement powers when they are failing to do so. To ensure that CSOs are prioritised for investment when they are impacting on protected areas (including bathing waters, shellfish waters and Marine Protected Areas).
- To review current bathing water legislation to ensure that it takes into account the latest research on bathing water monitoring, health effects and pollution mitigation (including on emerging pollutants), alongside advice from the WHO, including:
 - that the two current parameters (intestinal enterococci and E. coli) should be retained
 - an increase of the annual minimum number of samples from four to twenty
 - that the definition of a bather needs should be widened to include all recreational users of the water and immediate area
 - that bathing waters which are used all year round should continue to be monitored outside of what is considered the traditional bathing season
 - that research should continue into future viral and/or pathogen indicators, and antimicrobial resistance
 - that research and monitoring on microplastics and chemical contaminants, under other legislation, such as the Marine Strategy Framework Directive, should be aligned to take into consideration any potential health risks for water users.

Water companies

- To monitor all combined sewer overflows (or storm overflows). Monitoring information to be made publicly available annually, and real-time event information to be made available for all bathing waters and other important recreational areas.
- To prioritise investment to improve all high spilling CSOs. The performance of all CSOs should be continually reviewed to identify any operational issues and to ensure that they are meeting their permit requirements and are only operating under extreme rainfall conditions. Operational issues should be investigated and rectified as soon as they are identified as part of general asset maintenance.

The public

- To not flush any products, other than toilet paper and those labelled as 'Fine to Flush' down the toilet.
- To not dispose of fats, oils or greases down the sink or drain.
- To always clean up after their dog, take their litter home with them and not to feed gulls.
- To report pollution incidents to their local council, water company and the Environment Agency.

References:

[1] https://www.exeter.ac.uk/news/featurednews/title_754908_en.html

[2] https://www.who.int/water_sanitation_health/publications/srwei/en/

[3] [WHO recommendations on scientific, analytical and epidemiological developments relevant to the parameters for bathing water quality in the Bathing Water Directive \(2006/7/EC\)](#)



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