



## **Freshwater mid-strategy review 2025 – Final Report**

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## RESOURCES FOR CHANGE

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Established in 1997, **Resources for Change** (R4C) is a socially responsible, employee-owned consultancy with an excellent reputation for supporting social, community and environmental projects and organisations. We do this through varied evaluation approaches and through research, as well as large-scale consultation exercises that help to inform, for example, national strategy formation for government and NGOs. As a company motivated to make a difference ourselves, we encourage clients to critically examine progress with their priorities, as well as celebrating what has gone well.

The company has three directors (Mike King, Neil Smith and Deio Jones) and a wider team of experienced employees and associate consultants.

The registered office is Cwrt Isaf Farmhouse, Llangattock, Crickhowell, Powys, NP8 1PH. We have been a virtual company for 15 years, living and working across England, Wales and Scotland.

## 1. INTRODUCTION: CONTEXT AND PURPOSE OF RESEARCH

Esmée Fairbairn Foundation (“the Foundation” or “Esmée”) launched its 2020-2027 Strategic Plan in October 2020. ‘Clean and Healthy Freshwater’ is one of the 9 impact goals in the Plan. The rationale for this is described as follows:

*“One of the biggest challenges to the UK environment is the poor state of freshwater and the amplifying impact of climate change on it. Wildlife in freshwater has declined at a faster rate than in other habitats and is particularly susceptible to climate change. Despite the magnitude of the problem, it is easily overlooked by a public unaware of the implications of poor water stewardship.*

*Many rivers and lakes have water quality below the standard that is considered safe for beaches. There is already competition for available water and that is likely to increase, putting the natural environment at increasing risk whilst pollution from agriculture, industry and waste-water treatment continue to affect many rivers.”*

(Esmée Fairbairn Foundation website)

Esmée identified two long-term outcomes for its work in this area:

- Freshwater supports a resilient economy and thriving natural environment.
- Freshwater-dependent wildlife and habitats have been restored.

In 2021, Esmée commissioned Cardiff University Water Research Institute to gather insights from the sector on priority issues for Esmée’s support. The aim was to determine where Esmée’s resources could add the most value. This led to a proactive focus on several areas of work including citizen science, and place-based partnership projects through their Blue Spaces programme. Over the past 5 years, these areas have been developed as part of a much broader portfolio of supported projects and organisations working in the freshwater space. Currently, there are 48 active grants and social investments across England, Wales, Scotland and Northern Ireland. These support projects in pursuit of two long-term goals:

1. Freshwater supports a resilient economy and thriving natural environment.
2. Freshwater-dependent wildlife and habitats have been restored.

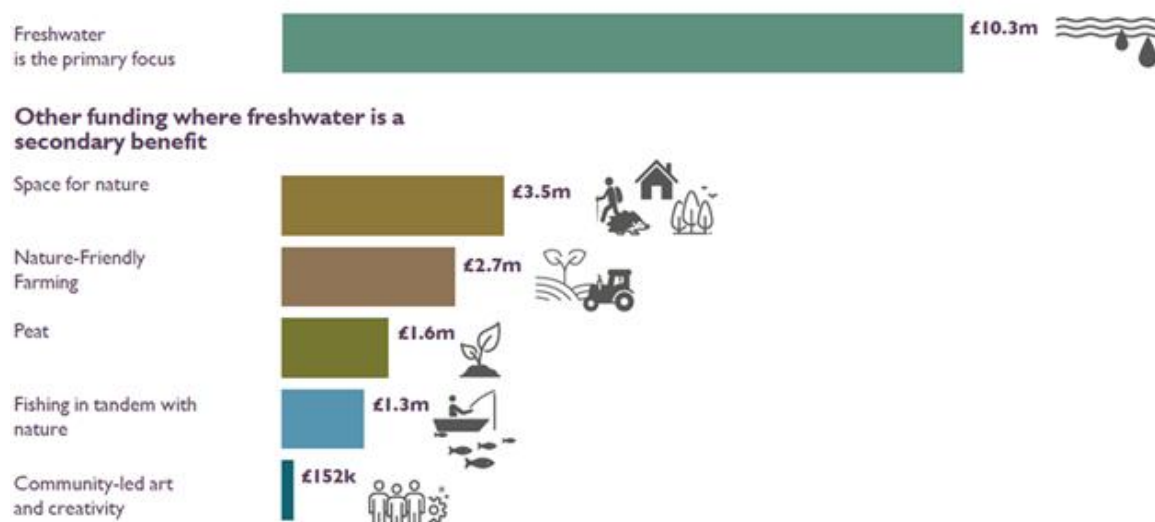
In addition, grantees funded under the Blue Spaces programme support communities to improve their local freshwater and contribute to both of the long-term goals above as well as Esmée’s Creative, Confident Communities outcome around communities having more say in decision making.

Grants have averaged £235,000 and range from £16,000 to £800,000, usually over three years with some for five years. They have been made to a wide range of organisations, from the Angling Trust and Surfers against Sewage, to the Wyre Catchment CIC and Forth Rivers Trust, and to UK Youth for Nature. Much of the funding is provided to meet core revenue costs relating to agreed outcomes for each grantee.

**Figure 1** shows the amount of Esmée’s funding (active as of January 2025) where freshwater is either the primary or secondary focus.

**Figure 1: Esmée’s funding towards freshwater as a primary and secondary focus**

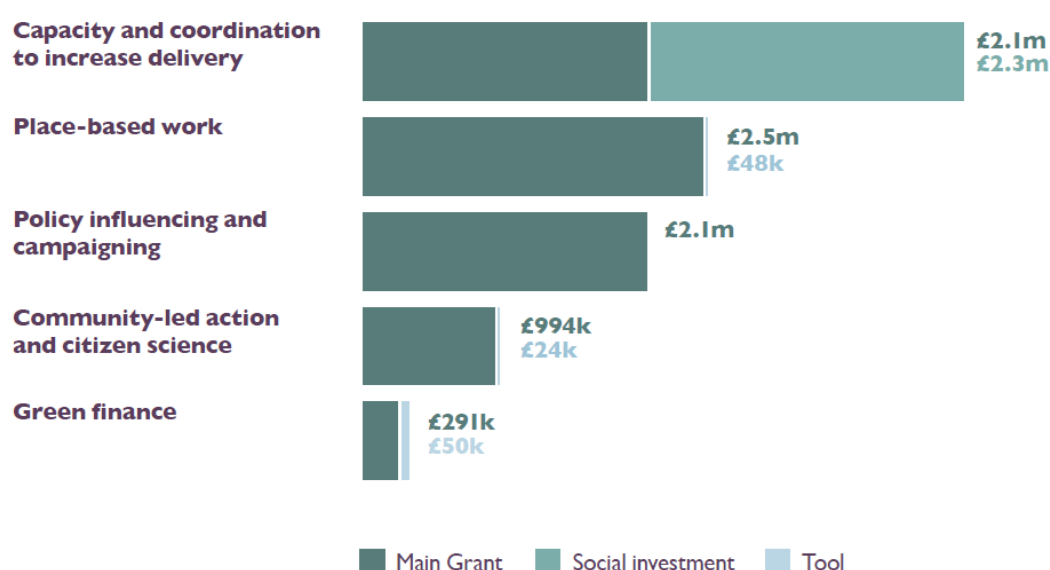
### ESMÉE’S FUNDING TOWARDS FRESHWATER



As a funder, Esmée offers both grants, and social investment. They also have a ‘Tools’ budget for work where Esmée plays a more proactive role such as convening and connecting organisations, and commissioning research or other consultancy support. **Figure 2** shows the breakdown of funding by area of support and support type (as of January 2025).

**Figure 2: Esmée’s funding towards freshwater - breakdown by area of focus and support type**

### ESMÉE’S FUNDING BY AREA OF FOCUS AND SUPPORT TYPE



In January 2025, Esmée Fairbairn Foundation ('Esmée' or 'the Foundation') commissioned Resources for Change to undertake a mid-strategy review of their Freshwater work. The purpose of this commission was to look at how Esmée was working in the freshwater space, what had changed in the context since the publication of the Strategic Plan, and what progress had been made towards achieving its objectives over the last five years. The review also sought feedback from stakeholders on the opportunities for Esmée to add value to the freshwater sector.

The review was structured around the following six research questions:

1. The changing context for Esmée's goals: in what ways is it better or worse in 2025?
2. The need for Esmée's support: what's changed in the funding situation for Freshwater from 2020 to 2025?
3. The opportunities for progress: what are the levers for change in 2025?
4. What are the blockers for progress in 2025?
5. What difference has Esmée's work, and funding made since 2020, and where is it struggling?
6. What feedback is there on the way Esmée is working in Freshwater?

## 2. SUMMARY OF METHODOLOGY

The review was undertaken using a mixed methods approach, the key components of which were:

- Scoping workshop with key Esmée personnel with a role in the freshwater work to develop a deeper understanding of what the team were hoping to achieve through the review process.
- Desk review of data provided by Esmée and wider contextual information.
- 30 semi-structured interviews including
  - 2 members of the Esmée team.
  - 19 grantees, 1 of these was also a social investment recipient.
  - 8 wider stakeholders (regulators / water company / specialist consultants / advisors e.g. communications / green finance).

The interviews were completed by country as follows: 10 UK wide, 7 in England, 3 in Northern Ireland, 3 in Scotland and 8 in Wales.

- A validation workshop, involving Esmée staff, providing an opportunity to feedback on the analysis, conclusions and recommendations.
- Stakeholder feedback on a summary of findings.
- Production of draft and final report.

A list of organisations interviewed can be found in Appendix 1 and the interview questions in Appendix 2.

This report provides an overview based on the research outlined above. It is largely a qualitative rather than quantitative assessment of context and progress.

‘Esmée’ and ‘the Foundation’ have been used interchangeably as shorthand for ‘Esmée Fairbairn Foundation’. ‘Supported organisations’ refers to organisations supported by Esmée through grant or social investment funding, or other tools such as provision of communications support or green finance advice. ‘Grantee’ refers to organisations in receipt of an Esmée grant.

### 3. KEY FINDINGS

In the five years since Esmée's strategy was developed in 2020, there have been notable changes in the UK's political, economic, social and environmental landscape. This report draws on desk research and discussions with stakeholders and supported organisations to highlight shifts affecting Esmée's Freshwater work, obstacles to progress and factors driving better freshwater outcomes.

Key findings are detailed across four themes:

- Policy, law and regulation.
- Environmental data.
- Funding and finance.
- Public engagement and activism.

This section also includes an overview of current pressures on the freshwater environment, and the impact of Esmée's work and funding in this area based on each theme.



### 3.1 CONTEXT: THE STATE OF FRESHWATERS - PRESSURES AND PROGRESS

The context for this review is that the UK's freshwater environment is under significant pressure. Pollution from sewage and agricultural runoff, invasive non-native species, physical modification of rivers and climate change impacts, such as low flows and warming waters, are all taking a toll. Despite decades of policy effort, targets set by the Water Framework Directive remain out of reach and catchment partnerships are often under-resourced. Public concern over water quality has intensified in recent years, yet visible progress remains slow.

Despite the challenges there are some grounds for cautious optimism. Investment from the water industry is increasing, alongside funding for nutrient neutrality. Collaborative catchment initiatives - many supported by Esmée - are expanding. The pace and ambition of river restoration such as those on the River Wye and River Lugg are growing. Farmer-led initiatives are on the rise and there is a greater emphasis on and recognition of the benefits of natural flood management.

Esmée's core funding has enabled interventions to restore river corridors, improve water quality and enhance biodiversity across multiple UK catchments. Esmée's support has also enabled community-led initiatives and campaigns, boosted collaboration on data and citizen science, raised awareness of nature-based solutions and supported increased advocacy efforts. Crucially, Esmée's funding model has created the space for organisations to innovate, test and scale actions and approaches that work.

As Esmée looks ahead to the remainder of its strategy period, there is a clear opportunity to deepen, extend and embed the progress and positive change already underway.

This section provides further background on the state of our freshwater systems.

#### 3.1.1 CURRENT PRESSURES

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Many factors impact the freshwater environment across the four UK countries, whilst each country also has some distinctive pressures due to geography, land use and governance. This section briefly summarises the main pressures.

**Nutrient runoff:** Across all four countries nutrient runoff (notably nitrates and phosphates) from agriculture is a major source of pollution, causing eutrophication, algal blooms and loss of biodiversity. This can be particularly significant in catchments that have intensive livestock or arable farming with the effects increasingly multiplied by extended dry periods.

**Urban runoff and wastewater discharges:** Pollutants from these sources (including combined sewer overflows) such as chemicals, nutrients and pathogens can degrade water quality, harm aquatic life, contribute to issues like algal blooms, increase habitat loss and have health risks. This is particularly a concern in areas of high population density and ageing infrastructure. Urban runoff can also contribute to flooding.

**Peatland degradation:** Historical drainage, industrial pollution, burning and forestry has significant effects on water coloration, acidity and hydrology across the UK.

**Water abstraction:** The removal of water from the environment for drinking, agriculture and industry alters flow regimes and can harm ecosystems and threaten water supplies.

**Land use changes:** Changes due to urbanisation and deforestation increase surface runoff and sedimentation, impacting water quality and aquatic habitats.

**Highly modified rivers:** Water bodies that have been altered, for example by weirs, dams and canalisation, for flood defences, urban development and agriculture, result in habitat loss, flow problems, fragmentation and fish migration issues. Highly modified rivers limit floodplain function and wetland connectivity, dam barriers (for example from hydro projects) can impact fish populations. Key species at risk include Atlantic salmon, European eel, freshwater pearl mussel and water vole.

**Climate change:** Impacts include more frequent flooding and drought which disrupt river flows, threaten freshwater ecosystems and reduce water availability. Increased water temperatures reduce oxygen levels and favour invasive species and create harmful algal blooms. Reduced flows can concentrate pollutants.

**Invasive Non-Native Species (INNS):** This includes species such as signal crayfish, Himalayan balsam and Japanese knotweed, which degrade habitat quality and outcompete native species. INNS affect all parts of the UK, but some catchments are particularly impacted.

### 3.1.2 WHAT HAS CHANGED IN THE STATE OF FRESHWATER ENVIRONMENT SINCE 2020?

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This section draws on desk research and stakeholder discussions to summarise what has changed in the environmental condition of freshwater and freshwater habitats in the UK, since the development of Esmée's strategy in 2020.

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#### UK-WIDE OVERVIEW

An analysis of the UK's Water Framework Directive (WFD) surface water body status data (2009 – 2022) shows very limited progress in improving the ecological status of rivers, lakes and other surface waters.<sup>1</sup> Across the UK, freshwater systems continue to be heavily impacted by agricultural runoff, wastewater discharges, physical modification of rivers and increasingly, climate-related impacts such as low flows and warming waters.

As Glenys Stacey, Chair of the Office for Environmental Protection (OEP) noted in 2024:

*"Recent assessments ...show that over four in five (surface water bodies) are not in good ecological condition, or on a trajectory towards it. We have seen little change in recent years, despite measures designed to improve matters."*<sup>2</sup>

Whilst the long-term trends seem clear, it is important to be cautious when interpreting WFD assessment data. The dates of the most recent assessments vary by nation - 2019 for England, 2020 for Northern Ireland, 2021 for Wales and 2022 for Scotland. The data can appear more complete than it is, due to lack of up-to-date data. Critics also highlight that the WFD's 'One Out, All Out' principle may obscure partial

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<sup>1</sup> JNCC (Joint Nature Conservation Committee) (2023) *Surface water ecological classification*. JNCC.

<sup>2</sup> Stacey, G. (2024) *Dame Glenys Stacey's speech at the Westminster Energy, Environment & Transport Forum policy conference*, Office for Environmental Protection, 18 September.

improvements as a single failing indicator prevents a water body from achieving good status. Additionally, differences in monitoring frequency, methodology and classification thresholds between the UK nations complicate direct comparisons.

Climate change impacts - notably drought, flooding and rising water temperature - are becoming more frequent and severe, adding further stress to freshwater systems. Low river flows, fish kills, algal blooms and erosion events were all reported more frequently over the 5 years since 2020.<sup>3</sup> While the impacts vary regionally, the overall trends signal mounting risks to freshwater ecosystems. These risks are further exacerbated by the widespread modification of rivers, streams and hydrological systems across the UK.

Meanwhile, sewage pollution remains a headline issue. In 2023 combined sewer overflows (CSOs) discharged untreated sewage into rivers and coastal waters in England and Wales at record levels, driving public outrage and triggering regulatory and investment responses.<sup>4 5</sup> Equivalent monitoring data is not available for Scotland and Northern Ireland.

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## ENGLAND

Progress toward the Environmental Improvement Plan (EIP) targets remains limited, according to the OEP in its 2023-2024 assessment. The overall status of England's water environment remains broadly static, with little measurable improvement. The OEP noted an increase in recorded pollution incidents, likely due in part to improved monitoring and concluded that progress has stalled or even reversed in some places. Based on the most recent available data (2019), only 16% of surface waters in England meet WFD objectives. The OEP anticipates that, at most, 21% could reach 'good' by 2027, far short of the government target of 77%.<sup>6</sup>

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## NORTHERN IRELAND

In Northern Ireland, while there have been marginal improvements in some areas, the overall quality of surface water has declined compared to five years ago. The Northern Ireland Audit Office (NIAO) specifically points to intensification of agriculture as contributing to declining water quality through nutrient pollution.<sup>7</sup> This suggests that efforts have either been insufficient or ineffective, highlighting the urgent need for change.

Despite River Basin Management Plans being in place since 2009, water quality is worsening. It is not expected that the target for 100% of surface water bodies to reach 'good' ecological status by 2027 will be met. Rivers and lakes are deteriorating, harmful algal blooms have increased, with agriculture a key contributor. Adverse impacts are affecting recreational fishing and the country's reputation. Progress on reforming farming practices relating to nutrient and manure management remains limited.

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<sup>3</sup> Environment Agency (2021) *Living better with a changing climate*. GOV.UK, Environment Agency.

<sup>4</sup> Environment Agency (2024) *Environment Agency publishes storm overflow spill data for 2023*. GOV.UK

<sup>5</sup> Natural Resources Wales (2023) *Storm overflow spill data report – 2023*. [online] Natural Resources Wales.

<sup>6</sup> Office for Environmental Protection (2025) *Progress in improving the natural environment in England 2023–2024*. London: OEP.

<sup>7</sup> Northern Ireland Audit Office (NIAO), 2024. *Water Quality in Northern Ireland's Rivers and Lakes*.

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## SCOTLAND

The Scottish Environment Protection Agency (SEPA) reported a slight improvement in 2022, with the percentage of water bodies in good or better condition increasing from 66.4% to 67.1%. Despite this, major challenges persist, including climate stress (such as river temperatures and low flows), sewage discharges, invasive species, barriers to fish migration and diffuse pollution.<sup>8</sup>

Scotland's State of Nature 2023 report<sup>9</sup> highlighted broader biodiversity issues, with 1 in 9 species at risk of extinction in Scotland and a 15% decline in species abundance since 1994.

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## WALES

Natural Resources Wales's 2024 interim WFD assessment found 40% of water bodies at good or better status, a stable assessment since 2021, marking a 3% improvement since 2015 and 8% since 2009. 50% of Special Areas of Conservation (SAC) designated rivers met phosphorus targets in 2024, an 11% rise from 2021.<sup>10 11</sup>

Biodiversity remains challenged and 18% of freshwater and terrestrial species in Wales are at risk of extinction<sup>12</sup>, with forecasts warning of the extinction of salmon from Wales within decades attracting particular interest.<sup>13</sup>

In 2023, Dŵr Cymru sewage discharges rose by 68%, highlighting infrastructure pressure but also likely reflecting improved monitoring and reporting.<sup>14</sup>

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<sup>8</sup> Scottish Environment Protection Agency (SEPA) (2022) *Water Environment Classification Hub*.

<sup>9</sup> State of Nature Partnership. (2023). *State of Nature Scotland 2023*. State of Nature Partnership.

<sup>10</sup> Natural Resources Wales (2025) *New water quality data sheds light on the health of Wales's waters*. News release, 13 March.

<sup>11</sup> Natural Resources Wales (2025) *Assessment of water quality in Wales 2024*. Update page/news release.

<sup>12</sup> State of Nature Partnership, 2023. *State of Nature Report: Wales 2023*.

<sup>13</sup> Milner, N. & Garcia de Leaniz, C. (2023). *The identification and characterisation of small salmon populations to support their conservation and management*. NRW Evidence Report No. 674. Natural Resources Wales.

<sup>14</sup> *Wales sewage: Dŵr Cymru discharges rose by 68 % in 2023, report finds*. BBC News, 14 May.

## 3.2. POLICY, LAW AND REGULATION

### 3.2.1. CONTEXT - WHAT HAS CHANGED SINCE 2020?

Building on desk research and stakeholder input, this section examines how freshwater-related policy, law and regulation have evolved in the UK since Esmée’s strategy launch in 2020.

Since 2020, all four UK nations have introduced new policy frameworks, strategies and / or regulations which have impacted on or aim to address the declining state of freshwater and freshwater habitats.

While some commitments are shared across the UK, such as the support for the Kunming-Montreal Global Biodiversity Framework (GBF), implementation is largely devolved. This results in varying approaches and levels of progress.

Despite the changes, it is clear that major challenges remain and that fundamental reform is still needed. Common themes include weak enforcement of regulation and the complexity and fragmented nature of the governance.

*“The vital question is how the barrage of targets, obligations, private and voluntary initiatives, green finance schemes are meant to add up to a sustained and meaningful effort to improve the state of the environment”*

(Nik Perepelov, RSPB/ Blueprint for Water 2023)<sup>15</sup>

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### UK-WIDE DEVELOPMENTS

The UK’s endorsement of the Kunming-Montreal Global Biodiversity Framework (2022) - including a target to restore 30% of degraded inland waters by 2030 - is now reflected in domestic policy through the UK Biodiversity Framework (2024) and the National Biodiversity Strategy and Action Plan (2025). While these frameworks set high-level ambitions, delivery is devolved, meaning that they rely on nation-specific strategies and governance for delivery.

The EU Water Framework Directive (WFD) continues to shape water policy across the UK, but its application now varies by country, post-Brexit.

The Planning and Infrastructure Bill introduced in March 2025 applies primarily to England, though several provisions could have UK-wide application. Its primary aim is to streamline delivery of new housing and infrastructure, and to boost economic growth. Environmental organisations and legal experts have raised concerns that, if enacted in its current form, the Bill could weaken environmental protections and potentially undermine the UK’s ability to meet legally binding environmental targets.

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<sup>15</sup> Wildlife and Countryside Link (WCL) (2023) *A bit wet? Defra’s Plan for Water*. London: Wildlife and Countryside Link.

## ENGLAND

England has introduced significant reforms since 2021, centred on the Environment Act 2021 and a suite of subsequent policy measures. The Act introduced legally binding targets including on water quality and biodiversity. It also established the Office for Environmental Protection (OEP), an independent statutory body responsible for overseeing compliance with environmental law.

Since then, further developments include the Plan for Water (2023) and the Water (Special Measures) Act (2025), aimed at strengthening enforcement and transparency around pollution incidents, particularly sewage discharges. However, stakeholders have expressed concerns that progress is fragmented and that reform remains incomplete.

Key developments:

- **Environment Act 2021** - introduced legally binding targets, established requirements for Local Nature Recovery Strategies and established the OEP.
- **Environmental Improvement Plan (2023)** - set out government targets and actions for restoring the natural environment. This included a target to restore 75% of surface water bodies to good ecological status by 2027.
- **Plan for Water (2023)** - a Defra initiative responding to mounting public and political pressure with measures on storm overflows, catchment-based approaches, and pollution control. Broad in scope but seen by many as a missed opportunity for a more comprehensive approach.
- **Nutrient Mitigation Scheme (2023)** - developed by Natural England, this scheme enables developers to offset nutrient pollution. However, it primarily addresses new housing which is a relatively small part of the problem.
- **Mandatory Drainage and Wastewater Management Plans (DWMPs) (2021)** - introduced to require water companies to develop long term plans to address issues such as pollution and climate resilience. The plans have been criticised for lacking ambition and enforcement mechanisms.
- **The Water (Special Measures) Act (2025)** - aimed at strengthening enforcement, this Act introduced enhanced penalties for pollution, required real-time monitoring and public reporting of storm overflows and granted new powers to regulators.
- **The Corry Review (2025) - Delivering Economic Growth and Nature Recovery: Independent Review of Defra's Regulatory Landscape:** found the existing regulatory system to be overly complex, inconsistent and risk-averse, hindering both nature recovery and economic growth.
- **The Cunliffe Review (2025) - Independent Commission on the Water Sector Regulatory System:** looking at changes needed to reform the water sector. Full report and recommendations expected summer 2025, interim findings published 3rd June 2025. The review is seen as a potential turning point for more integrated and accountable water sector regulation. The interim findings received a mixed response.

- **Land Use Framework (expected 2025)** - a strategic policy initiative designed to guide how land is managed, aiming to balance competing priorities across climate, biodiversity, food production and development. Final publication expected in the second half of 2025, following consultation.

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## NORTHERN IRELAND

The suspension of the **Northern Ireland Executive** between February 2022 and February 2024 had a significant impact on environmental governance, delaying policy development and implementation. Since the restoration of the Executive however, momentum has begun to rebuild, marked by the publication of the Environmental Improvement Plan (2024) and the Water Resource and Supply Resilience Plan (2025).

In response to rising public concern - particularly following the ecological crisis in Lough Neagh where nutrient pollution led to severe algal blooms - the Department of Agriculture, Environment and Rural Affairs (DAERA) has taken a more proactive approach. The Lough Neagh Action Plan (2024) and new Nutrient Action Programme Regulations (2025) signalled a shift towards stronger pollution control and ecological restoration. However, enforcement capacity and regulatory oversight remain significant challenges, limiting the effectiveness of these initiatives.

While the Office for Environmental Protection (OEP) can exercise its functions in Northern Ireland, with the consent of the Northern Ireland Assembly, calls remain for stronger local enforcement mechanisms.

Key developments:

- **Environmental Improvement Plan (2024)** - published by the Department of Agriculture, Environmental and Rural Affairs (DAERA) with a focus on water quality, biodiversity and climate.
- **Water Resource and Supply Resilience Plan (2025)** - a 50-year strategy produced by Northern Ireland Water, emphasising climate resilience and long-term sustainability.
- **Lough Neagh Action Plan (2024)** – produced by DAERA in response to the severe ecological crisis in the largest lake on the island of Ireland, due to algal blooms.
- **Nutrient Action Programme (NAP) Regulations (2025)** - (DAERA) introducing tighter agricultural pollution controls.

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## SCOTLAND

Scotland remains committed to maintaining or exceeding EU environmental standards. While there are currently no legally binding targets specific to freshwater, emerging policy and legislative frameworks indicate stronger intent. Key developments such as the Scottish Biodiversity Strategy (2022) and the proposed Natural Environment (Scotland) Bill (2025) support nature recovery, climate adaptation and integrated, catchment-scale approaches. Initiatives such as the Urban Waters Route Map and Regional Land Use Partnerships (RLUPs) represent a shift toward more joined-up, place-based planning. However, these remain in early stages and have yet to be scaled up or resourced for nationwide impact.



Environmental Standards Scotland (ESS) - established in 2021 as the equivalent of the OEP in England and Northern Ireland - serves as the independent watchdog responsible for ensuring public authorities in Scotland comply with environmental law.

Key developments:

- **Natural Environment Bill (2025)** - will set binding targets to halt biodiversity loss by 2030 and strengthen the legal framework for nature restoration, with implications for freshwater habitats.
- **Environment Strategy for Scotland (2020)** - sets out the long-term vision for healthy ecosystems, including freshwater, providing the strategic framework for environmental policy.
- **Scottish Biodiversity Strategy (2022)** - commits to a “Nature Positive” Scotland by 2030, with goals for rivers, lochs and wetlands, including increased catchment-based action.
- **Urban Waters Route Map (2021, updated 2024)** - produced by Scottish Water, sets out a path for reducing urban pollution and improved water quality, supported by nature-based solutions.
- **Wild Salmon Strategy (2022)** - produced by the Scottish Government to address pressures on salmon populations, including water quality, flow and physical barriers.
- **Pilot Regional Land Use Partnerships (RLUPs) (2021)** - the Scottish Government used this to test mechanisms for integrated land use planning. Calls to roll out nationally have so far gone unanswered.

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## WALES

Wales has retained the core principles of the WFD in domestic law and introduced several measures such as the Water Resources (Control of Agricultural Pollution) Regulations (2021) and Better Water Taskforce (2024), a cross-agency initiative to support more coordinated, catchment-based management.

While the Nature Recovery Action Plan continues to guide efforts to restore freshwater ecosystems, progress has been limited by delays in regulatory implementation and the absence of a permanent environmental oversight body. This governance gap has hindered the delivery of more effective and enforceable protections. The proposed Environmental Principles Bill - expected to be introduced to the Senedd in summer 2025 - may address this gap. The Bill is anticipated to establish statutory biodiversity targets and strengthen the legal framework for environmental governance in Wales.

Key developments include:

- **Nature Recovery Action Plan (refreshed in 2020–2021)** - a non-statutory strategy published by the Welsh Government, to continue to guide efforts to restore habitats and ecosystems in the absence of a statutory Environmental Improvement Plan.
- **Water Resources (Control of Agricultural Pollution) Regulations (2021)** - introduced to address nitrate pollution, is currently being phased in.



- **Nutrient Management Boards** - established in 2022 as a strategic response to address nutrient pollution in sensitive river catchments.
- **SAC Pollution Action Plan (2023)** - a response to nutrient pollution failures in protected rivers, aiming to balance tensions between environmental priorities and housing development.
- **Mandatory DWMPs (from 2021)** - aiming to address storm overflows and climate resilience.
- **Better Water Taskforce (2024)** - a cross-agency coordination (regulators and government) to improve water quality and investment planning.
- **The Water (Special Measures) Act (2025)** - introduced enhanced penalties for pollution, empowered regulators to take stronger enforcement action and required real-time monitoring and public reporting of storm overflows.

### 3.2.2 BLOCKERS AND DRIVERS (POLICY, LAW AND REGULATION)

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This section outlines the main policy, legal, regulatory and political factors influencing progress toward the goal of clean and healthy freshwater. It draws on a combination of stakeholder views and desk research.

#### Political momentum

The 2024 General Election saw major parties making manifesto pledges around freshwater quality and reform of the water sector. Rarely has freshwater enjoyed such a high political profile, driven by public concern over pollution, activism and media scrutiny.

The Independent Water Commission, (the Cunliffe Review), seen by many as an example of increased political will and a major opportunity to reform the water sector. As one stakeholder put it:

*"I can't remember a time when such a fundamental and dramatic shift appears to be occurring. But whether they (the government) will bottle it I don't know."*  
(Interviewee feedback)

Despite the momentum, stakeholders warn that short-term political cycles, institutional inertia and lack of long-term commitment remain significant obstacles to delivering meaningful systemic change.

#### Stronger laws and regulations, weak enforcement

The past 5 years have seen moves to strengthen regulatory and legislative frameworks across the UK including binding targets in England (Environment Act, 2021); proposed targets in Scotland (Natural Environment Bill, 2025); enhanced penalties in Wales (Water Special Measures Act, 2025), and tighter pollution controls in Northern Ireland (NAP Regulations, 2025).

Yet at the same time many stakeholders stress that regulatory systems remain fundamentally flawed, and question whether forthcoming reform, such as the Cunliffe report recommendations, will go far enough.

A consistent concern is the limited capacity of environmental agencies. Enforcement agencies across the UK remain under-resourced and over-stretched, undermining their ability to implement existing laws. In

Wales and Northern Ireland, the absence of an effective and permanent environmental watchdog exacerbates this concern.

Agricultural regulation remains particularly challenging. Enforcement is weak and many farmers lack the financial support, advice or incentives needed to change their practices in order to comply. Wider challenges within the farming sector including economic pressure and political sensitivity, make tougher regulation a complex proposition.

In England, the Environment Agency is widely perceived as failing in its regulatory function. As one interviewee put it:

*"The elephant in the room is the Environment Agency which has shifted from a relatively functioning, well-resourced organisation to one that is so neutered, so subject to internal reorganisations, and so lost its way that it is almost valueless" (Interviewee feedback)*

It is worth noting however, that after years of decline, the Environment Agency is seeking to renew its monitoring efforts, for example upgrading its laboratory capacity to analyse water samples and increasing water company and farm inspections.<sup>16</sup> Nonetheless, stakeholder confidence remains low.

In Wales, Natural Resources Wales (NRW) has been criticised for failing to set and enforce permits in relation to agriculture and storm overflows. Despite new regulations, compliance remains low, and enforcement resources are limited.<sup>17</sup>

*"The agricultural sector in Wales holds significant political influence, making it challenging to enforce stricter environmental protections" (Interviewee feedback)*

In Northern Ireland, the Office for Environmental Protection highlighted poor regulatory performance and weak enforcement of existing environmental laws in its 2024 report.<sup>18</sup>

In Scotland, SEPA lacks capacity to monitor and enforce diffuse rural pollution and to manage growing urban wastewater pressures.<sup>19</sup>

### **Fragmentation and lack of integration**

Stakeholders pointed to "policy churn" i.e. new plans and strategies piling on top of existing ones without sufficient follow-through or join up.

The lack of cross-sector integration is seen as a critical barrier to progress. Policies on agriculture, urban development and economic growth often conflict with freshwater protection goals. Regulatory systems are seen as narrow and fragmented, failing to address cumulative impacts. For example:

- In Wales, stakeholders noted the focus on phosphorus contrasting with other nutrients and pollutants like 'forever chemicals' which are poorly monitored.

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<sup>16</sup> Environment Agency (2025) *Strengthening Environmental Science: A New Chapter in Water Monitoring*. GOV.UK blog, 6 March.

<sup>17</sup> Senedd Cymru Rural Affairs Committee (2022) *Report on storm overflows in Wales*. Cardiff: Senedd Cymru

<sup>18</sup> Office for Environmental Protection (2024) *OEP's Annual Report and Accounts 2023–24*. London: OEP.

<sup>19</sup> Environmental Standards Scotland (2025) *Statement on responses to ESS' Storm Overflows report*, 15 May.

- In Scotland, fisheries management was seen as ‘outdated’ with a single species focus (e.g. salmon) rather than broader ecosystem restoration.
- Across all nations, the lack of a comprehensive land use strategy was seen as hindering joined-up freshwater resilience planning.

Some efforts to improve cross-sector integration are emerging:

- In Scotland, Regional Land Use Partnerships (RLUPs) show potential although these remain limited in scale.
- In Wales, Nutrient Management Boards offer a model for coordinating action on nutrient pollution across sectors including agriculture, wastewater and housing in sensitive river catchments.
- In England, the Plan for Water aimed to promote greater integration, but stakeholders describe it as fragmented. Hopes now rest with the upcoming Land Use Framework to reconcile competing demands and policy areas.

### **Nature-based solutions – from rhetoric to reality?**

Nature-based solutions are increasingly recognised as an important driver for freshwater health, yet actual investment remains modest.

In England, an analysis of water company business plans revealed that just 2% of water company budgets and 5% of enhancement budgets in 2024 were allocated to natural solutions, highlighting a persistent delivery gap. Still, their growing inclusion in strategies and plans suggests an encouraging shift in direction provided it is supported by sustained funding.<sup>20</sup>

### **Conclusion**

Progress is being driven by growing political attention on the water sector, stronger legal and regulatory frameworks, and emerging policy support for nature-based solutions. However, these advances are held back by persistent barriers, most notably weak enforcement, fragmented policy implementation and short-term political cycles that undermine long-term fundamental reform. Without tackling these systemic issues, recent momentum risks stalling. Real impact will depend on sustained political will, stronger institutions and better coordination across sectors.

#### **3.2.3 IMPACT OF ESMÉE’S SUPPORT (POLICY, LAW AND REGULATION)**

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Organisations often face difficulties in securing funding for policy advocacy due to, in some instances, the challenge of attributing tangible outcomes or conflicts of interest.

*"It's almost impossible to find funding when you are a policy advocacy organisation." (Interviewee feedback)*

Esmée's support has had an impact in several ways as follows:

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<sup>20</sup> Wildlife and Countryside Link (WCL) (2023) *Water company scorecard: analysis of business plans*. London: WCL.

- Enabling independent advocacy and policy influence
- Strengthening policy capacity and collaboration across the UK
- Leveraging public engagement, litigation, and evidence for change
- Building capacity

### **Enabling independent advocacy and policy influence**

Esmée's core funding has played a vital role in empowering environmental NGOs to engage in policy advocacy and influencing environmental regulation. Organisations have benefited from Esmée's independent support, enabling them to advocate for stronger environmental protections and more effective enforcement of water quality standards. Because this funding is independent, it allows NGOs to hold public authorities and private companies accountable without fear of financial repercussions or political influence. This independence has been crucial in driving forward Esmée's broader objectives for a healthier freshwater environment. Notably, Esmée's funding has helped organisations like **Afonydd Cymru** (the umbrella body for Welsh Rivers Trusts), ensure more strategic policy and advocacy work. Their enhanced capacity has enabled them to contribute technical expertise to national policy bodies through the Better River Water Quality Task Force, resulting in the introduction of legally binding conditions on sewage overflows with enforceable regulations that hold water companies accountable. This ensures that going forward overflows will operate correctly, significantly improving water quality and reducing pollution across Welsh rivers. Afonydd Cymru also challenged the Welsh Government on digester issues, which led to an independent review on the evidence and concerns that were raised.

### **Strengthening policy capacity and collaboration across the UK**

Recognising regional disparities in freshwater policy expertise, Esmée has strategically invested in organisations to strengthen their policy and advocacy capacity. In Northern Ireland, support for **Northern Ireland Environment Link** has enabled the addition of much-needed expertise, filling a longstanding gap in freshwater policy engagement. Similarly, Esmée's core funding for **Wales Environment Link** has allowed the organisation to respond to rising concerns around water pollution, culminating in the creation of a dedicated water policy group to coordinate member efforts. These investments have not only built regional capacity but have also allowed recipient organisations the flexibility to respond to new policy developments and changing political landscapes, an increasingly important quality in today's dynamic regulatory environment.

In England, Esmée's support for the **Zoological Society of London** has deepened its involvement in strategic partnerships, particularly with the Greater London Authority. This has contributed to long-term initiatives such as a 10-year plan for London's rivers and the London Water Vole Programme, demonstrating how Esmée's funding enables organisations to become central players in regional environmental planning.

### **Leveraging public engagement, litigation, and evidence for change**

Esmée's approach has also linked grassroots activism and scientific evidence to policy impact, supporting organisations that mobilise public engagement as a tool for change. A prime example is their support for

**Surfers Against Sewage's** Protecting Wild Waters campaign, which has significantly elevated public dialogue around river pollution. The campaign has improved public awareness and generated valuable citizen science data, enabling direct challenges to both polluting companies and the political agendas. SAS have also helped establish a strong cross-party parliamentary group on river and sea pollution, with 70 MPs involved, which was largely due to constituent pressure.

*“MPs are coming because their constituents are really badgering them about this. So, the public pressure is big. ....we've got a real window for change, not just tinkering around the edges, but systemic reform is now on the agenda where it wasn't before.” (Interviewee feedback)*

Esmée has supported the use of strategic litigation and high-profile public campaigning by funding organisations such as **Fish Legal** and **River Action**. These groups have used legal mechanisms, including judicial reviews, to challenge pollution in rivers like the Wye and Severn, holding polluters, decision-makers and regulators to account and setting legal precedents for environmental protection, and some legal wins with much broader implications, such as the Costa Beck case, and the Caffyn v Shropshire Council and NFU v Herefordshire Council cases which have created a new legal and planning framework for intensive livestock developments.

Complementing these direct interventions, Esmée has also commissioned and co-developed influential reports with the **Chartered Institution of Water and Environmental Management (CIWEM)**. One report applied a systems-thinking approach to the raw sewage pollution crisis, while another offered a co-created vision for future water governance. Both reports have contributed independent, evidence-based insights to national debates on freshwater policy. Furthermore, Esmée is currently supporting **WRAP** in convening the UK food and drink industry to co-develop a Water Roadmap, fostering cross-sector collaboration on long-term sustainable water management.

### **Building capacity**

Many **River Trusts** have reported that Esmée's funding has enabled them to grow their organisational capacity and broaden the scope of their work. A **regional partnership of River Trusts in East Anglia** has bolstered resilience, fostered collaboration and provided critical resources to address shared environmental challenges, such as the declining state of the region's iconic chalk streams. Esmée has also supported **UK Youth 4 Nature** towards core costs to upskill young people, strengthen and grow their movement, campaigning around nature-related issues in the UK, with a particular focus on agricultural pollution in freshwater.

### **Conclusion**

Esmée support has played a critical role in enabling environmental organisations across the UK to influence freshwater policy, law, and regulation, which is an area often overlooked by traditional funders. By supporting core costs, Esmée has empowered NGOs to engage in strategic advocacy, hold polluters and public bodies to account, and contribute expert input to national policy, resulting in stronger environmental protections. Their investment has also addressed regional disparities in policy capacity, particularly in Wales and Northern Ireland, and supported long-term planning in England. Esmée has helped link grassroots activism, public engagement, legal action and scientific evidence to drive systemic

change. This support has positioned a number of organisations as key players in the sector and has strengthened their ability to respond to emerging challenges.

*"Esmée Fairbairn Foundation's support is crucial for addressing challenges in freshwater policy advocacy." (Interviewee feedback)*

### 3.3 ENVIRONMENTAL DATA

#### 3.3.1. CONTEXT - WHAT HAS CHANGED IN RELATION TO AVAILABILITY AND QUALITY OF DATA?

Since 2020, there have been notable developments in how freshwater environmental data is collected, shared and used across the UK. While technological advances and increased transparency have led to some improvements, coverage remains uneven and integration inconsistent.

##### **Agency-led monitoring under pressure**

Water quality monitoring by the UK's environmental agencies has come under increasing strain in the past 5 years.

**In England**, between 2019 and 2022 the Environment Agency reduced water quality sampling by nearly a third due to budget constraints, raising concerns about pollution oversight and data quality.<sup>21</sup> More recently, the EA has increased inspections of water companies and invested in monitoring infrastructure signalling renewed commitment.<sup>22</sup>

**In Northern Ireland**, public access to real-time data remains limited and available data is generally only adequate for broad level analysis. This has raised concerns over transparency particularly around agricultural pollution and the chemical status of water bodies.<sup>23, 24</sup>

**Scotland's** monitoring capacity was severely impacted by a 2020 cyberattack on SEPA. While progress has been made, some datasets remain incomplete.<sup>25</sup>

**Wales** has maintained broad-scale water quality monitoring since 2020, with a particular focus on nutrient sensitive Special Areas of Conservation (SACs). However, many water bodies were not assessed for key chemical pollutants, such as PFAS, in the most recent WFD assessments. This has raised concerns about data completeness and underestimation of pollution risks.<sup>26</sup>

##### **Sewage discharge monitoring expands unevenly**

<sup>21</sup> The Guardian (2022) *River testing in England falls to a 10-year low*, 2 September.

<sup>22</sup> Department for Environment, Food & Rural Affairs, Environment Agency and Barclay, S., 2024. *Inspection surge to crack down on water sector pollution*

<sup>23</sup> Office for Environmental Protection (OEP), 2024. *A review of implementation of the Bathing Waters Regulations in Northern Ireland*. [pdf]

<sup>24</sup> Environmental Justice Network Ireland, 2025. *Lough Neagh: A case study in environmental justice*. [pdf]

<sup>25</sup> Audit Scotland (2022) *The 2020/21 audit of the Scottish Environment Protection Agency*. Edinburgh: Audit Scotland.

<sup>26</sup> Afonydd Cymru (2023) *Water Framework Directive: Chemical assessments in Wales*. Crane: Afonydd Cymru.

A Combined Sewer Overflow (CSO) is a system that releases untreated sewage and stormwater into rivers or seas during heavy rainfall to prevent flooding. Common in older urban areas, CSOs help manage overflow but pose serious environmental risks by discharging pollutants directly into freshwater and coastal ecosystems.

Event Duration Monitors (EDMs) have become a central tool in the UK's approach to managing and reporting sewage discharges from Combined Sewer Overflows (CSOs). Between 2020 and 2025, EDM coverage has significantly expanded across the UK, improving real-time visibility of overflow events and contributing to public transparency and regulatory oversight. However, as of 2024, progress has varied by nation in terms of monitoring coverage:

- **England:** 100%
- **Wales:** 99.5%
- **Scotland:** 38%, - a further 1,000 installations are planned for 2025
- **Northern Ireland:** Limited – a partial roll-out is underway prioritising high-risk outfalls

### Changes in WFD methodology across the UK

Across the UK, chemical status classification changed significantly in 2019 with the inclusion of persistent pollutants like PFOS and PBDEs. This led to a sharp drop in the number of water bodies classified as having 'good' chemical status, especially in England (now 0%).

### Increased transparency and tools

Public access to sewage discharge data has improved, particularly in **England and Wales**, where companies are now required to publish annual data on storm overflows, triggering widespread public and media scrutiny. Interactive real-time maps have been launched by **Welsh Water** and **Scottish Water**, and user-friendly apps via third party platforms such as Surfers Against Sewage's Safer Seas and Rivers Service have further increased public access. **Northern Ireland** continues to lag on open access data.

### Tech-driven monitoring and modelling

The use of technology such as satellite imagery, AI, and environmental DNA (eDNA) has expanded. The high-resolution satellite imagery from the Copernicus Sentinel-2 mission, is increasingly used for monitoring water quality for example detecting algal blooms and water clarity. eDNA initiatives such as the annual PondNet survey in England and recent loch assessments in Scotland demonstrate the value of non-invasive sampling methods. These tools are increasingly helping to fill gaps where traditional monitoring is sparse.

### Growth of citizen science

Citizen science initiatives such as Riverfly Monitoring (Riverfly Partnership), Clean Water for Wildlife (Freshwater Habitats Trust) and local 'Outfall Safaris' (e.g. Thames 21) have expanded across the UK. These initiatives are increasingly valued for their ability to detect pollution hotspots and raise public



awareness, though data quality and geographic coverage remain uneven and standardization remains an issue.<sup>27</sup>

### 3.3.2. ENVIRONMENTAL DATA - BLOCKERS AND DRIVERS

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Despite progress in transparency and technology, environmental data remains inconsistent, siloed and often insufficient to support timely and effective action. Nonetheless, citizen science, new digital tools, (combined with growing public awareness) offer potentially powerful drivers of improvement.

#### **Data gaps and inconsistencies**

Monitoring remains inconsistent across the UK. Different thresholds, methods and reporting cycles make it difficult to compare data across nations or track trends reliably. Post-Brexit divergence in WFD implementation risks increasing this fragmentation further.

#### **Missing small water bodies**

Significant gaps also persist for small water bodies - headwaters, ponds, and streams - which are critical for biodiversity but often excluded from official programmes. This underlines the need for a catchment-wide approach to monitoring.

#### **Citizen science - filling the gaps and building engagement**

Citizen science has emerged as a major force in data collection, public accountability and also as a public engagement tool. The growth of these schemes UK wide reflects growing public concern about the state of our rivers and other water bodies. In Northern Ireland, citizen scientists have played a pivotal role in monitoring water quality, providing evidence to support calls for action and showing how the public can hold institutions to account in the Lough Neagh Catchment.

Citizen science is valuable for multiple reasons, such as the data produced, the engagement and the independence from water companies who are often accused of 'marking their own homework' with regard to the data they provide to regulators.

However, challenges remain in integrating these citizen science generated datasets into formal systems. The Catchment Systems Thinking Cooperative (CaSTCo),<sup>28</sup> funded by Ofwat through their Innovation Fund is working to standardise citizen science protocols and support co-produced monitoring between communities and professionals.

#### **The Water Framework Directive (WFD) target date**

2027 is the target date for achievement of good ecological status of water bodies. It is evident that the target will be missed by a considerable margin. This failure could be a spur to future action, necessitating renewal of approach and commitment.

#### **The Land Use Framework (England)**

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<sup>27</sup> Nesta (2025) *Citizen science in UK water management and regulation*. London: Nesta.

<sup>28</sup> <https://castco.org/about/>



The framework is expected to make available far more comprehensive and sophisticated land use sets, along with data models and tools to support decision-making by government, landowners, farmers and others.

### **Technology - a growing enabler**

Advances in remote sensing, machine learning, and modelling systems are increasingly being used to enhance data coverage and insight. These tools offer particular promise in areas with sparse or outdated monitoring infrastructure.

### **Conclusion**

The UK's freshwater data collection and availability is improving in some areas, particularly through new technology and citizen science, but remains fragmented and inconsistent elsewhere. Limitations on official monitoring, challenges incorporating citizen science generated data into decision making and limited coverage of ecologically important small water bodies, continue to hold back progress. In Northern Ireland, lack of public transparency and trust are also a barrier to public engagement.

For environmental data to better support freshwater recovery, progress will depend on aligning traditional monitoring with new technologies, working with citizen science in ways that enable collaboration with it as a credible data source, addressing the gaps in current monitoring and data collection.

#### **3.3.3 IMPACT OF ESMÉE'S SUPPORT (ENVIRONMENTAL DATA)**

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Esmée's support for organisations to invest in environmental data and citizen science is significantly enhancing the UK's ability to monitor, protect and restore its freshwater ecosystems. It has had an impact in several ways:

- Strengthening citizen science in freshwater conservation
- Driving change through high-quality data
- Scaling up monitoring and collaboration

#### **Strengthening citizen science in freshwater conservation**

Esmée supports a diverse range of organisations that are enhancing the role of citizen science in protecting and restoring freshwater ecosystems. This includes empowering local communities, River Trusts, NGOs and others to gather robust data on water quality, aquatic biodiversity and habitat conditions.

By encouraging collaboration between citizen scientists, academic researchers and regulatory bodies, Esmée helps bridge the gap between grassroots data collection and formal regulatory systems. This approach not only improves the quality and reach of freshwater monitoring efforts but also builds long-term public engagement and a shared sense of responsibility for the health of rivers and streams.

#### **Driving change through high-quality data**

Esmée's funding of **WildFish's** Smart Rivers Project has been instrumental in supporting a citizen science initiative that focuses on the collection of high-quality scientific data since 2018. WildFish are now working with the Environment Agency and SEPA to see how they can integrate this data and use it to inform environmental improvements.

### **Scaling up monitoring and collaboration**

Support to the **Freshwater Biological Association (FBA)** has enabled the delivery of the Riverfly Partnerships monitoring project in Scotland, with two dedicated staff now monitoring river systems. Similarly, Esmée's support to the **Zoological Society of London (ZSL)** has helped coordinate citizen science activities across the Thames catchment, strengthening data collection and volunteer engagement across a highly populated and environmentally pressured area.

The **Catchment Systems Thinking Cooperative (CaSTCo)** is a significant UK initiative aimed at transforming how river catchments are monitored and managed. Its primary goal is to integrate citizen science and community monitoring into evidence-based catchment management, enhancing the health of freshwater ecosystems. While CaSTCo's main funding comes from water companies via Ofwat's Innovation Fund, Esmée has also played a supportive role in relation to environmental initiatives, including support for the **Riverfly Partnership**, enabling the expansion of citizen science monitoring and training in demonstrator catchments across the UK. By combining traditional monitoring methods and the application of technology, with citizen science, CaSTCo aims to create a comprehensive understanding of river health, facilitating more effective and inclusive water management strategies.

### **Conclusion**

Esmée's support for citizen science is playing a vital role in strengthening the UK's capacity to understand and protect its freshwater ecosystems. By investing in high-quality data collection, empowering communities, and fostering collaboration between grassroots groups and regulatory agencies, Esmée is helping to create a more informed, engaged and resilient approach to freshwater conservation. This support is improving the scientific baseline, driving systemic change and long-term stewardship of the freshwater environment.

## 3.4. FUNDING AND FINANCE

### 3.4.1. CONTEXT - WHAT HAS CHANGED IN RELATION TO FUNDING AND FINANCE FOR FRESHWATER

Since 2020, the funding and finance environment for freshwater and freshwater habitats in the UK has evolved in several important ways:

#### Reform of agricultural support

New agricultural support schemes have begun replacing the EU's Basic Payment Scheme, with a growing emphasis on environmental outcomes. Given agriculture's significant role in diffuse water pollution, as well as the role of farmers and other land managers in freshwater habitat restoration, these schemes are critical to freshwater recovery. However, progress remains uneven and slow across the UK.

- **In England**, the Agriculture Act 2020 introduced the Environmental Land Management scheme (ELM). One of its three components, Landscape Recovery, supports large-scale, long-term projects delivering significant environmental benefits. Round 1 (2022) had a strong focus on water-related outcomes. Meanwhile, the Sustainable Farming Incentive scheme closed abruptly to new entrants in March 2025 causing anger and uncertainty, with no confirmed date yet for the revised scheme to be launched.
- **In Scotland**, a new agricultural support framework is being introduced in 2025 under the Agriculture and Rural Communities (Scotland) Act 2024. From 2025, at least 50% of farm funding will be linked to environmental outcomes, though direct payments will continue until 2026.
- **Wales** has delayed the launch of its Sustainable Farming Scheme until 2026, following farmer concerns. The Basic Payment Scheme (BPS) has been extended through 2025 but offers limited incentives for low-income farms to shift toward nature-friendly practices.
- **Northern Ireland** has retained elements of the EU-style agricultural policy under the Northern Ireland Protocol. The Environmental Farming Scheme (EFS), introduced in 2017, continues to fund measures such as riparian buffers and wetland creation but its impact is constrained by funding caps and a lack of strategic reform.

#### Water industry investment on the rise

Water companies have significantly increased environmental investment. In England and Wales, Ofwat's 2024 Price Review approved £104 billion for 2025 - 2030 in capital investment, including major infrastructure upgrades and pollution reduction initiatives.<sup>29</sup>

*"Today marks a significant moment. It provides water companies with an opportunity to regain customers' trust by using this £104bn upgrade to turn around their environmental record and improve services to customers." (David Black, Ofwat Chief Executive Dec 2024)*

<sup>29</sup> Ofwat (2024) *Our final determinations for the 2024 price review – Sector summary*. Birmingham: Ofwat, 6 December.

**Funding for nutrient neutrality has increased**, as efforts to address nutrient pollution - particularly nitrogen and phosphorus - have intensified across the UK. While England and Wales have implemented specific nutrient neutrality schemes, Scotland and Northern Ireland have focused on broader nutrient management strategies. In England, the government announced up to £30 million in 2022 for a Nutrient Mitigation Scheme to facilitate housing development while protecting waterways.<sup>30</sup> In Scotland, SEPA has supported enhanced nutrient use efficiency and natural flood management projects under schemes like the Water Environment Fund.<sup>31</sup>

### **Increasing focus on green finance and nature markets**

Governments across the UK are promoting market-based and green finance approaches to nature recovery, including biodiversity credits, blended (public and private) finance, and payment for ecosystem services. Though in the early stages and patchy, these approaches are growing.

**In England**, Landscape Recovery seeks to blend public and private finance. Biodiversity Net Gain (BNG) has created a structured biodiversity credit market, while the Natural Environment Investment Readiness Fund (NEIRF) has supported over 130 organisations since 2021. Landscape Enterprise Networks (LENs) founded in 2017, has facilitated £11 million in corporate payments to farmers in England and is now expanding into Scotland.<sup>32</sup>

**Scotland's** FIRNS (Facility for Investment Ready Nature), modelled on NEIRF, is supporting the development of investable nature-based projects. Distilleries like Diageo and Chivas Brothers are backing catchment restoration efforts in the Spey Catchment<sup>33, 34</sup> The **Wild Fisheries Fund**, backed by the salmon industry, supports habitat work, and a new freshwater fund, (modelled on SMEEF -Scottish Marine Environmental Enhancement Fund) is in early development.

**In Wales**, the government is exploring blended finance, biodiversity net gain and payments for ecosystem services, under the Nature Recovery Action Plan. Though still at an early-stage, Wales is actively exploring ways to attract private investment alongside public and community efforts.

**In Northern Ireland**, while formal nature markets are undeveloped, projects like SloWaters reflect growing interest in blended finance. Overall, funding remains predominantly public, with no dedicated strategy to scale private investment.

### **Trusts and foundations - a mixed picture**

While overall environmental giving nearly tripled between 2018 and 2022, support specifically for freshwater initiatives declined over the same reporting period. Freshwater remains:

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<sup>30</sup> Department for Environment, Food & Rural Affairs (Defra) Press Office, 2023. *Coverage on Nutrient Neutrality*. [online] Defra in the media blog, 23 May.

<sup>31</sup> Scottish Environment Protection Agency (SEPA), 2023. *Water Environment Fund*. [online] SEPA

<sup>32</sup> 3Keel, 2024. *2024 success sees LENs set to scale rapidly in 2025*. 3Keel

<sup>33</sup> Chivas Brothers, 2024. *Chivas Brothers Launches River Restoration Project*.

<sup>34</sup> Diageo, 2022. *Diageo achieves global water stewardship certification at all Speyside distilleries*.

*‘one of two Cinderella issues that have received small shares of funding in every single edition of this research’ (Where the Green Grants Went, 2024)<sup>35</sup>*

(Note: Data lags mean recent contributions - such as from Esmée - are not fully reflected)

### 3.4.2 BLOCKERS AND DRIVERS (FINANCE AND FUNDING)

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Efforts to restore the UK’s freshwater systems are gaining visibility and political support, but funding and finance remain fragmented, fragile and at times misaligned with long-term needs. Whilst new initiatives show promise - from green finance to water sector investment - systemic barriers continue to slow progress.

#### **A step forward, but still under-resourced**

Ofwat’s record £104 billion investment plan for 2025 - 2030 reflects growing public pressure and political will. This represents a near doubling from the previous 5-year period and includes significant funding for environmental improvements such as reducing pollution and improving river health. The investment opens the door to greater collaboration between water companies, NGOs, farmers and land managers through catchment-based approaches.

It is clear that the sustained activism and public pressure over recent years has had an impact in terms of driving funding and political focus onto issues of water quality, particularly in relation to sewage.

Meanwhile, the Water Restoration Fund, funded by fines on polluting water companies, is being directed to frontline organisations for freshwater recovery. Ofwat’s Innovation fund provides £200 million to strengthen the water sector’s capacity to innovate. Yet decades of underinvestment have left much of the UK’s water infrastructure outdated and overstretched.

With rivers and freshwater habitats gaining more public and governmental attention, more organisations - including those that previously did not focus on freshwater - are now competing for the same limited funding resources.

Short-term funding cycles make it difficult to plan or deliver long-term improvements, particularly for smaller NGOs and local partnerships who lack capacity including operational resources, specialist fundraising skills, hindering their ability to access larger grants / funding or to explore blended finance. Smaller NGOs risk being outcompeted for ecological talent as construction sectors expand and the sector wrestles with a capacity crisis.

#### **Infrastructure in crisis**

Funding gaps are especially visible in infrastructure investment. In Northern Ireland, the £1.9billion Living with Water Plan was deferred, largely due to spiralling costs and insufficient public funding. This has prolonged reliance on ageing Victorian-era systems that contribute to flooding and sewage overflows.<sup>36</sup>

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<sup>35</sup> Environmental Funders Network, 2024. *Where the Green Grants Went 9: Patterns of UK Funding for Environmental and Climate Causes*.

<sup>36</sup> Northern Ireland Audit Office, 2024. *Funding Water Infrastructure in Northern Ireland*. NIAO.

*‘Every single lake, river, and coastal waterway in Northern Ireland fails to meet good environmental quality standards.’ (Cllr Anthony Flynn, Green Party)*

### **Uncertain and slow reform of agricultural support**

Post-Brexit agricultural reform is key to tackling diffuse pollution from farming- as well as having an important part to play supporting habitat restoration and management - yet policy rollout remains slow and uneven. England’s Landscape Recovery scheme and Scotland’s new environmental funding tiers hold promise but are complex and slow to scale. In Wales, delays to the Sustainable Farming Scheme have created further uncertainty. In Northern Ireland, the Environmental Farming Scheme continues but suffers from limited strategic direction and capped funding.

Without clarity or consistent support, farmers hesitate to engage with schemes, even when they offer long-term environmental benefits.

### **Green finance: opportunity meets practical challenges**

Governments are increasingly turning to green finance and nature markets to fund environmental outcomes. Yet nature markets remain underdeveloped. Key barriers include lack of coherent governance, inadequate underpinning of regulatory frameworks, a lack of demand from investors and concerns about greenwashing undermining confidence in private finance solutions.

### **Nature based solutions**

There is growing interest in aligning nature recovery with water and flood management funding through nature-based solutions.<sup>37</sup> Embedding such outcomes into statutory planning and flood resilience frameworks could unlock greater investment from the water sector, which commands significantly larger budgets than the nature recovery sector.

### **Farmer-led collaboration driving innovation**

Farmer-led initiatives, such the farmer clusters in the Evenlode catchment in England and the Source to Tap project in Northern Ireland (a cross-border partnership for the River Erne and Upper Bann catchments), are increasingly seen as a driver for progress. These initiatives offer a promising model for collaboration and locally led delivery, help integrate environmental outcomes with farming and community needs and have potential to align with public-private funding.

The **Landscape Recovery scheme in England** is one opportunity for farmers to collaborate and drive change. As well as potentially securing blended finance, farmer-led schemes can foster a shift in mindset, bringing a broader perspective to their potential impact within the catchments.

**Scotland, Wales and Northern Ireland** are seeing growth in similar approaches, although less formalised compared to England, where the facilitated Farmer Cluster model has taken off more widely. In Wales, farmer-led initiatives are growing through programmes such as Farming Connect and Nature Networks which support knowledge sharing innovation and partnerships including catchment-based work.

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<sup>37</sup> DEFRA, 2023. *Natural flood management programme 2023 to 2027*.

## **Evolving roles - catchment partnerships and NGOs**

With sources of grant funding becoming less predictable, many Rivers Trusts and environmental NGOs are pivoting towards consultancy-based income, delivering services for utilities, consulting on catchment planning or brokering blended finance. Whilst these business models may offer greater financial resilience, they require new skills and initial investment. Some of those we spoke to were critical of the model of NGOs accepting funding from water companies, questioning whether this undermines their independence.

## **Conclusion: bridging ambition and reality**

Increased political and public focus on freshwater are helping to drive finance and funding but there remain major blockers including the slow progress and uncertainty surrounding post-Brexit agri-environment schemes, long-term persistent lack of investment infrastructure and the slow progress in development of nature markets and green finance.

Continued public and political focus, clearer frameworks for green finance, and long-term support for catchment-scale approaches are seen as important to continue to drive finance and funding into freshwater work.

### **3.4.3 IMPACT OF ESMÉE'S SUPPORT (FUNDING AND FINANCE)**

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Esmée's support for organisations through their funding has had an impact in several ways:

- Enabling core capacity and leveraging additional funding
- Supporting independent and early-stage initiatives
- Green finance (private finance and investment in nature and natural capital markets)

## **Enabling core capacity and leveraging additional funding**

Esmée's unrestricted funding helps organisations cover essential core costs, such as staff salaries, which are often difficult to fund through traditional sources. This foundational support allows organisations to develop project ideas and secure further funding from other sources. For example, the **Norfolk Rivers Trust** used Esmée funding to employ a dedicated staff member for River Stiffkey project planning, resulting in more effective project delivery and over £1 million in additional capital funding for the catchment.

## **Supporting independent and early-stage initiatives**

Esmée's funding also supports the development of early stage projects and helps maintain the independence of organisations. The Blue Spaces programme exemplifies this by funding early project ideas with potential for future long-term funding. The **North Wales Rivers Trust** received Blue Spaces funding towards project costs for saving 'Salmon & Sewin', a pilot to improve freshwater input to the Menai Strait. For organisations like **WildFish**, Esmée's independent funding is crucial, as it has allowed them to pursue initiatives free from industry influence, maintaining their integrity and principles.

### **Green finance (private finance and investment in nature and natural capital markets)**

A growing number of freshwater projects have a green finance element. Esmée has a retainer contract with a nature finance expert who is advising projects on developing new financing models. The **Flow Country Investment Ready Nature Scotland project** was funded by Esmée in partnership with NatureScot and the National Lottery Heritage Fund. Esmée's funding helped establish a community-led conservation initiative and led to Scotland's first private-public co-funded peatland restoration project, created a sustainable partnership model for long-term conservation, and the Flow Country is now a UNESCO World Heritage site.

Funding for the **Wyre Rivers Trust** has enabled a pioneering project to investigate innovative funding opportunities, including green finance, for implementing Natural Flood Management (NFM) measures on the River Wyre and its tributaries, to help reduce the risk of flooding downstream.

The **Pembrokeshire Coastal Forum** was funded through the Blue Spaces programme to deliver the 'Developing Investable Action for River Restoration' project. This focused on river restoration, addressing nutrient challenges, agricultural pressures on designated freshwater and marine bodies in Pembrokeshire. It involved working with farmers to enhance their understanding of their environmental impact and explore possible mitigation strategies which could be undertaken with potential payments for ecosystem services and nature investment. The project allowed farmers to put forward what they want to do to improve water quality from their farm, rather than farmers having to choose from what funders feel is the best for farmers. This led to the development of quantifiable plans for farm actions that provide clear, verifiable benefits for funding agencies so that funders can decide whether to support these actions, even if the actions don't align with funders' current priorities or usual approaches.

### **Conclusion**

Esmée's funding plays a critical role in strengthening the core capacity of environmental organisations, enabling them to develop and deliver impactful projects that deliver meaningful change for freshwater ecosystems. Esmée enables organisations to build core capacity, attract additional investment and maintain independence. Its strategic backing of early-stage ideas has catalysed innovation and laid the groundwork for long-term, sustainable solutions.



### 3.5. PUBLIC ENGAGEMENT AND ACTIVISM

#### 3.5.1. CONTEXT - WHAT HAS CHANGED (PUBLIC ENGAGEMENT AND ACTIVISM)?

This section of the report draws on desk research and stakeholder discussions to summarise what has changed, in relation to public engagement and activism in relation to freshwater and freshwater habitats since 2020.

##### **Growth in public awareness and activism.**

Public outrage over water pollution has risen sharply across the UK since 2020, intensifying calls for systemic reform of the water industry.<sup>38</sup>

Public anger and activism have focused primarily on sewage discharges by water companies and, to a lesser extent, on agricultural pollution notably in the Wye catchment. Other freshwater issues such as over-abstraction, climate change impacts and run-off from highways have received less public attention.

##### **Influence of grassroots groups.**

Grassroots groups are increasingly influential, often proving more agile and vocal than established NGOs, and focusing on direct action and legal challenges. There has been growing collaboration between these groups and national campaigning organisations such as Surfers Against Sewage.

Youth-led climate groups have begun connecting freshwater pollution to wider environmental justice concerns, for example UK Youth for Nature who focus on biodiversity and nature conservation, emphasising the protection and restoration of natural habitats, including freshwater ecosystems, engaging young people in creative campaigns and advocacy. Activists are increasingly using digital platforms to mobilise support, helping drive mainstream attention and broaden the reach of freshwater campaigns.

##### **Rise in freshwater recreational activities**

The rapid rise in popularity of activities such as wild swimming and standup paddle boarding since the Covid pandemic has brought more people into closer contact with their local rivers and lakes. Sewage pollution resonates strongly with the public, being so visible, local and personal, in contrast to more abstract climate concerns. Bathing water quality is now a more clearly defined area of concern.

##### **Increased transparency of data**

Data on sewage overflows is now published annually in England and Wales. This increase in transparency together with greater media attention has been pivotal in fuelling public engagement around the issue.

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<sup>38</sup> The Guardian, 2024. *'People are incandescent...'* How sewage spills became a vote-winner for the Lib Dems. 7 July.

### 3.5.2. BLOCKERS AND DRIVERS (PUBLIC ENGAGEMENT AND ACTIVISM)

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This section sets out the main blockers and drivers to achieve the impact goal of clean and healthy freshwater, as they relate to the public engagement and activism theme. It is a combination of stakeholder views and desk research.

#### **Sustaining the pressure**

Stakeholders consistently identified strong public awareness, grassroots action and community-led initiatives as key drivers for progress towards Esmée’s freshwater goals, especially sewage pollution. Public concern and pressure drive political focus, holds authorities and water companies accountable and helps changes in policy and investment. Public outrage over sewage discharges has made water pollution a high-profile political issue. Constituents have driven MPs to act, for example helping to establish a cross-party parliamentary group on river and sea pollution as a response.<sup>39</sup>

*“MPs are coming because their constituents are really badgering them about this. So, the public pressure is big. .... we’ve got a real window for change, not just tinkering around the edges, but systemic reform is now on the agenda where it wasn’t before.”*  
(Interviewee feedback)

There is a widespread view that sustaining this pressure is important.

*“It’s people that power change, and that’s local action, local activities, and that is what we aggregate and take to the ‘front bench.’”* (Interviewee feedback)

At the same time, there is a view that parts of the environmental movement have become stuck in campaigning mode on these issues, at the expense of building collaboration and broader solutions.

#### **Broadening the approach**

There is also a sense that the focus on water companies and sewage discharges has overshadowed other issues such as agricultural pollution and climate change impacts which can be more significant but harder to address.

*“The current fixation on water companies and their environmental impact is preventing a more nuanced discussion about necessary actions.”* (Interviewee feedback)

Harnessing public concern around sewage pollution and refocusing it to drive progress on freshwater more broadly is seen by some as key to driving progress on water quality.

#### **Personal connections**

Despite the high levels of public awareness and concern about the state of our rivers, lakes and other water bodies, many people don’t seem to connect their personal behaviours e.g. excessive water use, pesticide use and littering with impacts on freshwater. This was seen as an important block to progress.

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<sup>39</sup> APPG on Water Pollution, 2024. *About the APPG*.

## Trust and collaboration

Maintaining public trust and momentum along engagement processes was seen as key. Limited transparency and public involvement in Northern Ireland, for example, have weakened trust in solutions around water pollution. The Environmental Justice Network Ireland (EJNI) stresses that meaningful public participation is essential for effective environmental governance.

Bringing stakeholders together (including communities) at a catchment scale was felt by some to be a good way to drive more impactful, inclusive approaches. However, this can be a resource intensive approach.

Lack of trust between the farming community and government is also seen as a potential barrier to progress, for example risking undermining the rollout of new agricultural policies aimed at improving freshwater quality. As well as trust, having the right policies and measures in place was seen as an important driver to support farmers and landowners to deliver nature-based solutions.

## Conclusion

Public engagement and activism have become a major force in freshwater conservation, driving political momentum, holding polluters to account and raising awareness. To translate this into long-term change, the freshwater movement must broaden its focus, deepen collaboration and connect public concern to meaningful personal and collective action. Harnessing this energy while building trust and inclusion will be essential for turning increased issue visibility into sustained, systemic reform.

### 3.5.3 IMPACT OF ESMÉE'S SUPPORT (PUBLIC ENGAGEMENT AND ACTIVISM)

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Esmée's support for organisations has played a pivotal role in empowering communities to lead freshwater protection and has had an impact in several ways:

- Empowering communities through engagement, training, and citizen science
- Campaigning, collaboration, and the power of community-led action
- Innovative, inclusive approaches to community-driven change

#### **Empowering communities through engagement, training, and citizen science**

Esmée has supported local community involvement in freshwater initiatives by funding training, citizen science, and campaigning. This backing has especially benefited small, grassroots organisations and community groups, leading to a surge in community-led initiatives.

These initiatives engage directly with local people, fostering a sense of stewardship and long-term commitment to improving river and wetland health. By grounding projects in lived experience and community narratives, awareness of freshwater challenges is deepened. For example, **Greenhouse Communications** has supported community networks by providing training in media and social media skills, distributing regular bulletins, and offering strategic resources, enabling campaign groups to communicate more effectively and mobilise action.

## Campaigning, collaboration, and the power of community-led action

Esmée's support has catalysed impactful national campaigns rooted in local activism. Raised or enhanced environmental awareness and knowledge, gives communities agency, to act and hold polluters accountable. This can then influence policy development and the long-term sustainability of solutions.

*"Local action can drive systemic change" (Interviewee feedback)*

*"Data is a hugely powerful tool in the hands of communities to challenge the narrative, it gives people agency, helps build communities of interest, and helps deepen environmental knowledge within communities." (Interviewee feedback)*

Esmée's grant to **Surfers Against Sewage (SAS)** enabled the launch of the 'Protecting Wild Waters' campaign, which applies lessons from coastal water regulations to inland rivers. By empowering communities to apply for bathing water designation, SAS has worked with 70 communities and successfully secured designation for 15 inland sites by 2024, with a target of 200. This kind of support not only raises awareness but also gives communities the knowledge, tools and confidence to hold polluters accountable. The emphasis on collaboration has been key, allowing communities to work with each other and with external organisations to co-design solutions that reflect local values and priorities.

## Innovative, inclusive approaches to community-driven change

Esmée's funding has enabled early-stage and experimental projects that centre local perspectives in shaping freshwater improvements. This is so that solutions can be found that address what the communities think is important about their local freshwater. Through the Blue Spaces programme, the **Welsh Dee Trust** engaged the public in the Gwenfro River catchment to co-develop project ideas based on community-identified needs about how to improve the river. It is hoped that this will lead to the development of a longer-term river restoration project, with multiple partners and funders. The Penpont Project led by **Action for Conservation** similarly used Esmée's support to conduct in-depth, intergenerational community engagement, including working with young people before beginning restoration, ensuring local voices shaped the project's vision. The work at Penpont is seen as a flagship project and they aim to apply their community-driven approach to other catchments within the Usk and influence broader watershed management strategies in Wales. In the Conwy catchment, Esmée supported a bold, exploratory approach through the *Gofod Glas* project - a partnership of **North Wales Wildlife Trust, Dyffryn Dyfodol** and **Natural Resources Wales** which challenges traditional models by creatively exploring people's relationship with freshwater and explores and discusses 'the theme of freshwater with curiosity'. This emergent approach, still in its early stages, is expected to yield more meaningful, enduring public involvement by embracing complexity and prioritising learning. Esmée have supported the approach recognising that it takes more time as it challenges the usual way of working and needs patience to recognise that people do not have instant answers.

Across all these examples, Esmée's support has encouraged awareness-raising that not only empowers communities but also influences broader institutional and societal responses to freshwater protection.

*"Esmée has an opportunity to act as a bridge - helping communities understand their priorities for freshwater ecosystems and connecting them with suitable financial resources for restoration." (Interviewee feedback)*

*"It's allowed us to pursue that focus on fresh water, and to do it in a way that aligns with what we'd already been doing in terms of working with the community, trying to understand how they see the river, what they feel the issues are, and building up a kind of priority or a plan together to address it." (Interviewee feedback)*

## **Conclusion**

Esmée's support has been instrumental in transforming how communities engage with and protect their freshwater environments. By funding organisations that support grassroots efforts, inclusive and innovative approaches and collaborative campaigning, Esmée supports communities to become active stewards of their local freshwater. This has deepened environmental awareness amongst the public, media and politicians and strengthened the public's ability to influence policy and hold polluters accountable resulting in long-term, collaborative change. This demonstrates that when local voices are heard and trusted, communities can lead meaningful, systemic change.

## 4. ESMÉE'S SUPPORT

### 4.1. STAKEHOLDER FEEDBACK ON WORKING WITH ESMÉE

The interviews asked the supported organisations about their experiences of working with Esmée. Overall, the feedback was strongly positive and is summarised under four main themes:

- Role of flexible and independent funding
- Support where it is needed
- Grant process and administration
- Collaboration and communication

#### 4.1.1 ROLE OF FLEXIBLE AND INDEPENDENT FUNDING

Grants from Esmée are highly valued. There are some specific aspects of the funding that make working with Esmée particularly beneficial.

**Flexible and unrestricted funding:** Grantees highlighted the critical importance of flexible and unrestricted funding, which empowers them to undertake a wide range of activities. This flexibility allows them to respond effectively to emerging challenges and changing circumstances. It also enables them to launch projects at the optimal time, rather than being constrained by rigid deadlines. Moreover, flexible funding respects the expertise of organisations, allowing them to prioritise based on real, on-the-ground needs rather than external preferences.

*"The funding from Esmée Fairbairn allows flexibility in supporting policy work, enabling the organisation to focus on key areas while remaining adaptable to new policy developments." (Interviewee feedback)*

*"Current government funding is often highly restricted, making it difficult to support community-led projects flexibly." (Interviewee feedback)*

The provision of unrestricted funding is seen as critical for supporting core operational costs (for example for staff, training, administration and governance), that are critical to functioning but often not covered by other project specific grants.

*"Esmée's support has been crucial in funding staff positions." (Interviewee feedback)*

It supports the development of a strong foundation that allows organisations to plan with confidence, build partnerships and collaborate with others in the sector, build their resilience and capacity, develop impactful projects and secure additional funding or resources from other sources. It also helps reduce the stress of constantly having to seek new funding streams, enabling organisations to focus more on their mission and long-term objectives as well as allowing organisations to expand and grow.

**Long-term funding:** Grantees emphasised that long-term funding provides organisations with much-needed stability, a crucial advantage over the often limited and uncertain nature of short-term funding

available from other sources. Having a commitment of at least three years is highly valued as it offers the time and security needed to:

- Fully develop and refine projects. With long-term funding, organisations can ensure their initiatives are thoughtfully planned, well-structured and executed to achieve lasting impact.
- Engage with and build community trust. Building meaningful relationships with the community takes time. Long-term funding enables organisations to work alongside local groups, creating a sense of ownership and collaboration, which is key to the success and sustainability of projects.
- Invest in people. Long term funding enables recruitment and training, and the ability to retain staff, thereby preserving valuable knowledge and expertise within the organisation which can enhance the resilience and effectiveness of grantees. Without this, organisations are forced to constantly rebuild, which can be detrimental over time.
- Grow and adapt to changing circumstances. A multi-year funding commitment provides the breathing room to assess progress, learn from challenges, and adjust strategies as needed. This flexibility supports innovation and growth, enabling organisations to stay relevant and responsive to evolving needs and changing circumstances.

*"Esmée Fairbairn foundation will focus on multi-year funding so that you can get a really good project going. With others you're constantly losing your staff and losing experience."*  
(Interviewee feedback)

*"Terrific, provided some stability over time, rather than short-term funding."* (Interviewee feedback)

Grantees suggested that funding for longer than three years would be desirable, with a minimum of five years to reduce uncertainty and give adequate time for community engagement.

*"There's this kind of novelty cycle of like, always wanting to see something new, whereas actually, persistence in good work at this moment in time is probably the most valuable of commodities for us."*  
(Interviewee feedback)

*"Offering five-year funding instead of three is seen as beneficial, especially for small NGOs, providing more security for future planning."* (Interviewee feedback)

**Independence and positive reputation:** Esmée's funding stands out for its independence, free from political influence or external agendas. This autonomy allows grantees to maintain their independence and challenge government policies, regulators, or others without the fear of compromising their financial support. This freedom is crucial for organisations that advocate for change, as they can remain objective and outspoken on issues that matter most to their goals, without the pressure of aligning with political or governmental interests.

Moreover, Esmée's reputation as a highly respected and impartial funder adds significant value to the projects it supports. Its independence from political and external baggage gives grantees a 'stamp of approval,' lending credibility and trust to their work. This endorsement can greatly enhance an organisation's ability to build new relationships and secure additional support, whether in the form of

further funding, collaboration opportunities, or engagement from other stakeholders. The association with such a reputable funder can elevate the profile of a project, increasing its chances of attracting further involvement from a diverse range of partners and investors.

*"Esmée's funding means that they can remain independent from government funding, which allows their organisation to challenge the government and regulators effectively."*  
(Interviewee feedback)

**Organisation stability and growth:** Core funding for staff and operational costs gives organisations the time and resources needed to plan, scope, and develop projects effectively as well as being able to undertake a wide range of activities, for example conservation work, working with volunteers, influencing policy etc. The core funding allows organisations to focus on delivering impact rather than just chasing grants, which leads to more wins for the freshwater environment.

Esmée's support has been a critical factor in the growth, and therefore success, of some organisations enabling them to be advocates for freshwater. Where there is a need this has included support for organisations who are in their early stages, having established themselves but still struggling to secure funding to recruit staff and implement projects. This support, therefore, provides them with the financial resilience and stability to enable them to continue to develop and grow.

*"Esmée's support has been crucial in funding staff positions."* (Interviewee feedback)

**Developing projects:** Esmée's support has helped with the development of projects including the initial scoping and planning, building partnerships, feasibility studies or pilot stages of projects that may then be able to scale up over time. This type of funding is often overlooked by other funders. This enhances projects credibility and helps to secure funding for longer term projects, including capital funding for practical delivery.

*"Facilitated critical groundwork for long-term success."* (Interviewee feedback)

*"Revenue funding helps organisations leverage additional capital resources. Esmée's support in this area is therefore a major enabler of progress."* (Interviewee feedback)

**Willingness to take risks and innovate:** Grantees highly value Esmée's openness to taking risks and funding innovative, emerging areas and early-stage ideas that might not yet have a proven track record but hold significant potential for long-term impact. These types of approaches otherwise struggle to secure support. This willingness to back untested approaches and new techniques is crucial in fostering creativity and experimentation. It allows organisations to explore novel solutions, break new ground in their work and have the confidence to innovate. An example of this is the bridge funding provided by Esmée, which enables grantees to fill financial gaps during critical stages of development. Without this kind of flexible, risk-tolerant support, many organisations would be unable to test new approaches or push the boundaries of their work and of freshwater conservation. This willingness to invest in the unknown is instrumental in driving positive change and fostering progress across the sector.

*"Their willingness to take the risk and prove the concept has been greatly appreciated."*  
(Interviewee feedback)



*"Esmée's funding has been groundbreaking, - they have taken some risks especially with the bridge funding." (Interviewee feedback)*

#### 4.1.2 SUPPORT WHERE IT IS NEEDED

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Grantees appreciated the types of work that Esmée's support enables. The key areas considered especially valuable are outlined below.

**Advocacy:** Funding to address the root causes of pollution is seen as important. Advocacy can help to drive meaningful change by influencing policies, public opinion, and decision-makers and can be the bridge between grassroots experience and systemic change. Priority areas for advocacy work were related to policy and regulatory reforms, enforcement of environmental laws, regulators having more power, encouraging industry to invest in pollution reduction and ensuring polluters are held accountable. It was seen as particularly important for independent NGOs, allowing them to hold others to account. It was also suggested that funding could be targeted at 'game changing issues' that can unite stakeholders around shared goals, creating the pressure and support needed for lasting change. Ensuring that advocacy work is coordinated could also avoid conflicting objectives across funded projects.

*"There is a need to look at metrics around transforming the polluters and reforming the systems." (Interviewee feedback)*

*"They need to put more effort/resources into making sure polluters are held to account, the law is enforced, and the regulators are doing their job." (Interviewee feedback)*

**Community engagement:** In recent years, the power of public support has become increasingly clear. To build on this momentum, continued emphasis on community engagement and community-led initiatives is essential for strengthening local capacity and deepening involvement in freshwater conservation. Communities also need to understand the timeframe and that real change takes time to happen and the current positive momentum and enthusiasm from communities needs to be encouraged to ensure that they 'stay in the game'. Investing in training, upskilling and clear communication within communities can significantly boost their impact. Esmée has and can continue to help ensure long-term sustainability by embedding projects within communities that feel a genuine sense of ownership and purpose. There's also an opportunity for Esmée to continue to act as a bridge, helping communities articulate their priorities for freshwater ecosystems and empowering them to take meaningful action. Esmée supports projects that take a more creative or unconventional approach to engagement, which invite in voices and perspectives that may be missed by traditional methods. This can lead to fresh ideas, wider participation and potentially better outcomes. Whilst the grantees under the Blue Spaces programme are testing these ideas this could be something that could be further prioritised in the future.

**Citizen science:** The emphasis on citizen science is seen as a priority to ensure that data collected extends beyond what is gathered under the Water Framework Directive (WFD). Esmée promotes consistency in data presentation and collection protocols as well as exploring strategies for integrating citizen-generated data into decision-making processes. For example, their funding of some of the biggest citizen science projects i.e. Riverfly, Anglers Water Quality Monitoring Network and SmartRivers. In addition, they also sit on the Steering Group for CaSTCo who are also looking at some of the same issues. By ensuring that data

from these initiatives is reliable and accessible, Esmée help enhance the impact and utility of citizen science in shaping policy and environmental management.

Citizen science activities offer far more than just valuable data; they also play a key role in fostering greater public engagement and empowering communities. By involving local people in the collection and analysis of data, these initiatives provide an opportunity for communities to actively participate in environmental stewardship and challenge official narratives. This engagement can stimulate wider public debate, driving policy change and influencing environmental decisions in a way that reflects the needs and concerns of local populations. Furthermore, citizen science helps to deepen environmental awareness among participants and the broader community, individuals gain firsthand experience, understand the importance of monitoring and preserving freshwater systems, and become more invested in the long-term health of their surroundings. This increased awareness can lead to stronger public support for environmental initiatives and greater advocacy for policies that promote sustainability.

**Grassroots projects:** It is important to continue funding grassroots projects as they are key to addressing local environmental issues. However, it's equally important to ensure these organisations collaborate with existing initiatives in the area to maximise impact and avoid duplication of efforts. Fostering partnerships can lead to shared resources, knowledge, and expertise, strengthening the overall approach. Additionally, any campaigning or advocacy by grassroots organisations must be based on scientific evidence and facts. This ensures credibility and aligns efforts with the best available data, making advocacy more effective and influencing policy in a meaningful way.

#### 4.1.3 GRANT PROCESS AND ADMINISTRATION

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**The application process is straightforward:** Compared to other funders, Esmée's application process is widely appreciated for being straightforward, flexible and designed to minimise administrative burden. Most grantees highlighted how easy it is to navigate the process, with clear guidelines and a user-friendly approach that makes applying for funding less time-consuming and more accessible.

**Funding priorities:** Esmée's freshwater funding priorities were described by a small number of grantees as being fairly broad, which can lead to uncertainty for some applicants.

*"At present, there is a lack of defined metrics, making it difficult for applicants to align their bids with Esmée's priorities." (Interviewee feedback)*

*"It's been okay for me, because we've had the funding. But I know other people who haven't had the funding, and they say I've got no idea what it is they want to fund." (Interviewee feedback)*

Suggestions to improve this included:

- Clearer definitions of the 'impact goal' and 'long term outcomes' for freshwater.
- Guidance could be more specific about the types of activities that Esmée would be likely to fund to help achieve the goals and outcomes i.e. will they be more likely to fund advocacy work or public engagement activities or skills development etc.
- Include particular targets for example around species or habitats.

- Request for clearer communication and guidance about Esmée’s funding criteria against which funding applications will be assessed, the amount of funding available, project scale and the decision-making process.

However, it is also important not to lose the benefits that unrestrictive funding provides for grantees. On one hand, grantees are asking for greater clarity, specificity and structure in Esmée’s freshwater funding priorities and processes. On the other hand, grantees also emphasise the value of flexible, unrestricted funding. To manage this apparent contradiction, Esmée could offer strategic funding i.e. for grantees seeking clearer direction. It could also offer structured funding calls around specific themes (e.g., species recovery, skills development) with clearly defined outcomes, activities and assessment criteria whilst also continuing to offer unrestricted funding, allowing for adaptive, innovative, or opportunistic projects outside tightly defined themes.

Esmée could also provide clearer definitions of long-term goals and impact metrics while allowing grantees freedom in how to achieve them or provide a “menu of illustrative activities” which could help guide applicants without being prescriptive. For example: “We aim to improve the ecological status of freshwater habitats by X%, but you tell us what combination of advocacy, restoration, or community engagement will best achieve this in your context.”

This approach keeps the door open for innovation while also supporting those who feel uncertain navigating a broad and open-ended funding landscape. This could then help organisations align their projects more effectively and improve grant applications. These clearer targets and objectives would then also help Esmée track and demonstrate its impact in a more structured and meaningful way.

One person mentioned some of the restrictions i.e. what Esmée don’t fund and that there may be room to look at some of these, for example that to apply an organisation needs to have an annual turnover of more than £100,000 which may rule out some small or grassroots organisations.

*“Clearer guidance on eligibility could help ensure organisations don’t miss relevant opportunities.” (Interviewee feedback)*

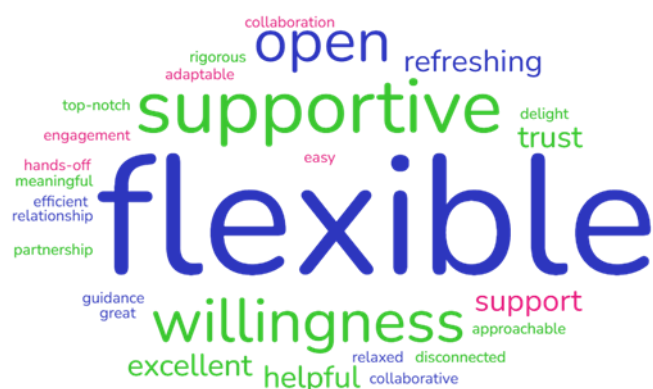
**The reporting process is easy:** The reporting process was welcomed and seen as less administrative than other funders processes. Grantees appreciated being able to use existing reports instead of creating extensive new documents. This process allows organisations to focus on what matters most i.e. developing and delivering their projects, rather than getting bogged down by complex paperwork or excessive reporting requirements.

*“Some funding mechanisms are massively onerous on the admin side of the process, almost to the point where you think you're spending more time on the admin elements than on the delivery elements. It's not like that at all with Esmée.” (Interviewee feedback)*

*“For a small NGO to have the flexibility on the reporting has been really good in terms of submitting reports that you already produce.” (Interviewee feedback)*

### 4.1.3 COLLABORATION & COMMUNICATION

**Helpful and constructive dialogue:** Esmée's relationship with grantees was hugely positive and appreciated. As reflected in the following word cloud, grantees consistently describe Esmée as approachable, offering guidance and being open to discussions about new ideas. They emphasise the meaningful engagement they experience, alongside a sense of trust and support that Esmée fosters. Grantees also highlight how refreshing, exciting, flexible and open the relationship with Esmée is, noting that these qualities make a significant difference in their ability to deliver impactful results.



This supportive approach creates an environment where organisations feel empowered and trusted, enabling them to focus on their core objectives and achieve their goals. Esmée's willingness to listen, offer advice and collaborate with grantees allows them the freedom to carry out their work with confidence, knowing they have the flexibility to adjust and adapt as needed throughout the project lifecycle. This level of openness and support not only strengthens the effectiveness of individual projects but also builds long-term, positive partnerships between Esmée and the organisations it funds.

Furthermore, this relationship goes beyond just financial support; it "feels more like a collaborative partnership" where grantees can access valuable insights and resources. The trust Esmée places in its grantees allows them to experiment, innovate, and respond to challenges without the constant fear of micromanagement or overly rigid expectations. As a result, organisations are able to take ownership of their work and focus on delivering meaningful outcomes.

*"We feel heard, Simon and colleagues are a delight to deal with."* (Interviewee feedback)

*"My experience is that they're very responsive and open to an iterative process."*  
(Interviewee feedback)

*"Esmée's support has been huge to us - massively helpful."* (Interviewee feedback)

*"Overall, the experience of working with Esmée has been really, really positive."*  
(Interviewee feedback)

*“Direct relationship with the team is refreshing and exciting. It's very unusual to have such an immediate link to the funder but very helpful” (Interviewee feedback)*

A small number of grantees felt a bit disconnected due to limited personal contact or due to Esmée's focus on specific programmes, for example through the work being progressed through the Blue Spaces programme. However, this is a live programme, and learning exchange and evaluation is now taking place.

*“It would have been nice to have an understanding of how the Blues Spaces funding has been delivered, and what the outcomes are so we can understand the wider projects and the other projects that have been funded through it” (Interviewee feedback)*

#### 4.1.4 CONCLUSION

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The interviews revealed overwhelmingly positive experiences from organisations supported by Esmée, highlighting the value of its flexible, long-term and independent funding. This approach enables organisations to respond to emerging needs, invest in their people, innovate and grow with confidence. Esmée's support is particularly valued for enabling advocacy, community engagement, citizen science and grassroots initiatives. These are areas often overlooked by other funders.

Esmée's role in supporting early-stage initiatives and community engagement ensures long-term sustainability and impact. By enabling policy advocacy and fostering financial resilience, Esmée acts as a key enabler of progress in freshwater conservation. The straightforward application and reporting processes were also praised, as was the open, collaborative relationship with the Esmée team, which fosters trust, confidence, and meaningful dialogue. While some grantees suggested greater clarity around funding priorities, there was a strong appreciation for the balance Esmée strikes between structure and flexibility. Overall, Esmée's approach is seen as empowering, supportive and instrumental in enabling impactful and sustainable change across the freshwater sector.

*“The environmental movement is extremely grateful to Esmée for their long-term commitment.” (Interviewee feedback)*

## 4.2. STAKEHOLDER VIEWS ON HOW ESMÉE COULD ADD VALUE IN THE FUTURE

Grantees overwhelmingly viewed Esmée’s funding as highly valuable to the freshwater conservation sector and they **support the continuation of both its current funding model and its focus on freshwater**. The key aspects which are already adding value were reported in section 4.1, and in summary are as follows.

- Unrestricted funding
- Long-term funding
- Funds to cover core costs, develop projects, undertake advocacy work, community engagement, citizen science and grassroots projects

While the existing approach was widely praised, interviewees offered a range of suggestions that might add value. These suggestions are presented here as they were reported by the interviewees. However, not all will be relevant or appropriate for Esmée to pursue, and they should be considered in the context of Esmée’s broader priorities. Accordingly, only a selection of suggestions that were assessed as relevant, practical and aligned with the objectives of the strategy have been carried forward and included in the recommendations section.

### 4.2.1 KNOWLEDGE SHARING WITH THE SECTOR

Grantees suggested that Esmée could provide more of a focus on clearly demonstrating the impact of its funding on freshwater projects. A few grantees suggested that more evidence of project outcomes would help Esmée evaluate success and provide valuable lessons for future initiatives. This could include, for example, assessing organisations’ skill sets before and after funding and evaluating whether campaign funding leads to meaningful change or protests for their own sake. However, meaningful change can often occur beyond the end of the funded period so it can be difficult to measure impact beyond the grant period.

Although a lot of effort is put into communities of practice and case studies across the UK (e.g. River Restoration Hub, Green Finance Institute Hive etc), grantees felt that there is a gap in capturing and sharing knowledge effectively across the four UK countries, or that this is disjointed or difficult for grantees to access. Grantees emphasised the importance of learning from the successful projects that are funded by Esmée across the UK, considering what has and hasn’t worked in different locations that could be replicated. This could include catchment-scale restoration, effective stakeholder engagement, long-term ecological monitoring, nature-based solutions and strategies for building community support around freshwater conservation.

Whilst it was recognised that Esmée hosts some events, it was suggested that they could facilitate more focused engagement with and between the grantees to improve learning and knowledge-sharing. This could enhance the sense of community and shared purpose among grantees and help with future collaborative opportunities. However, it was recognised that Esmée need to find a balance between aiding knowledge-exchange and creating a ‘convoluted knowledge exchange network’, which could become a burden and extremely resource intensive. A specific learning network for the Blue Spaces programme is already in place.

In addition, there is interest in Esmée playing a more significant role in influencing other funders and decision-makers in the freshwater space, including advocating for a less restrictive public sector funding.

*“Need new ways of doing things that are inspiring and not just a burden. Some funders have clunky, overly bureaucratic approaches, Esmée avoid that which is refreshing – don’t lose that.” (Interviewee feedback)*

#### 4.2.2 SUPPORT FOR NEW FUNDING MODELS

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There is growing focus - including within government - on the private investment in nature markets and natural capital as a potential source of long-term, sustainable funding for freshwater projects. This approach is gaining momentum in some areas due to increased awareness of nature-related financial risks and the recognition that many freshwater projects also deliver carbon and biodiversity benefits. Also, some organisations in the private sector, for example whisky distilleries in Scotland, depend on clean water so it’s in their interests to collaborate.

However, overall progress has been slower than hoped for and nature markets remain underdeveloped. Interviewees identified a large number of challenges, for instance around measuring outcomes, setting standard metrics, coordinating stakeholders and funders, reconciling long-term ecological returns with investor expectations, risk or reduced public accountability, knowing who to approach, how to evidence potential value (‘investible options’), how to provide assurance and concerns around ‘greenwashing’. This appears to be an area in which there could be funding opportunities in future, but which are hard to access for NGOs without the experience and knowledge to do so.

Therefore, it was suggested that Esmée could play more of a role in supporting the integration of corporate funding, helping to make green finance a more integral part of the funding landscape to ensure that it could effectively support freshwater conservation.

*“If green finance is going to work, it needs to be absolutely embedded in the corporate environment.” (Interviewee feedback)*

*“I think there’s still a little bit of trepidation, hesitation, concern that we’re just going to be supporting greenwashing.” (Interviewee feedback)*

#### 4.2.3 SUPPORT NEEDED FOR HOLISTIC FRESHWATER MANAGEMENT

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There is a clear need to adopt a broader, ecosystem-based approach to freshwater conservation with a focus on entire catchments. It was suggested that Esmée should prioritise catchment-scale projects that integrate land and water management, address environmental, social, and economic factors and which actively involve multiple stakeholders. This includes attention to land use and agricultural practices, soil health, headwater streams, invertebrate habitats, floodplain function, river restoration, fish migration, climate change impacts, urban pollution and emerging threats like forever chemicals and novel pollutants. Such an approach offers more sustainable, long-term benefits for people and nature and could provide examples of positive change showing the benefits for freshwater of taking a more holistic and coordinated approach.



While public concern and media attention around water quality have grown, the focus has largely been on sewage and water companies. A catchment-based perspective would help highlight the wider range of issues affecting freshwater environments and foster more comprehensive awareness and solutions.

Esmée currently supports farmer clusters under their nature friendly farming priority and community engagement is a significant feature of their current freshwater portfolio. However, a specific suggestion was to consider the role of community engagement within farm cluster models working at a catchment-scale, particularly those that raise awareness of all sources of pollution and river health threats. Esmée could invest in catchment-scale facilitators who can assess needs across sectors, build cross-sector partnerships and coordinate effective, landscape-level action.

*“Agricultural impacts ‘is a harder story to tell.’ (Interviewee feedback)*

*“There is a need to work on sewer misconnections.” (Interviewee feedback)*

*“Creating exemplars is important, but systemic change at the catchment level offers broader, more sustainable benefits.” (Interviewee feedback)*

*“Healthy terrestrial catchment leads to healthy rivers.” (Interviewee feedback)*

*“Catchment scale is a good scale to be working at, but collaborative approaches need funding.” (Interviewee feedback)*

#### 4.2.4 COLLABORATION

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Esmée already encourages partnership working but it was suggested that they could strengthen this expectation and further support collaboration between organisations. This would help to ensure their efforts in addressing freshwater issues add up to ‘more than the sum of their parts’, or where practical and useful, grantees could be required to collaborate, especially in areas where there are data and activity gaps, for example:

- To facilitate collaboration on systemic issues Esmée could focus on uniting NGOs so they can agree on messaging and bring about joint pressure on government and industry e.g. funding consultancy to develop messaging or to research technical solutions to issues such as manure management.
- Several grantees support excellent water monitoring work, but there may be scope for improving how this is done, coordinated and the learning used.
- Some grantees are effective campaigners and advocates for freshwater and so stronger connections between these, and other organisations could improve resource use, influence and overall impact.

In order to develop joint projects, Esmée could offer small grants specifically to aid collaboration e.g., convening experts and planning future projects.



*“Esmée cannot provide the levels of funding needed to address all the physical challenges, but they can make a difference to the organisations trying to make things happen - support bringing organisations together.” (Interviewee feedback)*

*“Still a lot of territoriality and tribalism in the environmental sector.... up to donors to insist any grants drive collaboration.” (Interviewee feedback)*

*“Esmée can add value by funding collaborative projects, supporting innovative nature-based solutions, and prioritising organisations working on large-scale environmental enhancements.” (Interviewee feedback)*

Esmée grants are often awarded through direct outreach to organisations, with the Blue Spaces programme actively seeking out diverse groups to support. While this approach is resource-intensive, it is considered strategic and proactive. It is favoured over relying on incoming applications, as many community-led projects face challenges with governance and grant writing, which can hinder their access to funding.

#### 4.2.5 SUPPORT FOR SMALL-SCALE CAPITAL FUNDING

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A number of grantees felt that allowing a small proportion of funding to cover capital costs could significantly enhance the impact of Esmée’s support. For example, allocating a modest amount of funding to enable small-scale, community-driven conservation activities (for example installing riparian fencing, planting native trees or restoring local wetlands), can serve as a practical entry point for engaging communities. These tangible improvements on the ground often act as catalysts for trust-building, demonstrating immediate, visible outcomes that residents can take pride in and feel ownership over.

*“Small-scale physical restoration efforts can be crucial in building community trust and engagement.” (Interviewee feedback)*

Small-scale physical restoration efforts, while modest in cost, are often critical for fostering long-term community support. They provide opportunities for local people to get directly involved, whether through volunteering, co-designing projects or contributing local knowledge. This inclusive approach not only strengthens relationships and credibility at the grassroots level but also helps lay the groundwork for more ambitious or strategic conservation goals in the future. By enabling communities to see and participate in real change, Esmée’s funding can help shift conservation from something that is perceived as being ‘done to’ communities to something that is co-created and locally valued. Currently Esmée does not specifically grant fund capital work, although it can sometimes support it through social investment.

#### 4.2.6 LOOKING AHEAD

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While the current approach is well-regarded, there’s a clear opportunity for a more strategic, joined-up funding model across the UK, with Esmée playing a convening and leadership role through their freshwater programme. Esmée could convene experts and organisations to shape future funding priorities in light of water industry and policy developments (e.g. the Cunliffe Review). Integrating water,

farming and other strands within future strategies - and aligning different funding streams - would help maximise impact and ensure the programme complements other funders more effectively.

#### 4.2.7 CONCLUSION

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Across all themes explored, grantees consistently expressed appreciation for Esmée's flexible, and collaborative approach to funding. At the same time, there is a strong appetite for Esmée to build on this foundation by adopting an even more strategic and convening role within the freshwater sector. By strengthening knowledge-sharing mechanisms, supporting innovative funding models like green finance, enabling collaboration at scale, and facilitating catchment-based, community-driven approaches, Esmée can amplify the impact of its investments and catalyse wider systemic change.

While grantees recognise the importance of maintaining Esmée's light-touch, some also see potential for them to lead the way in shaping more integrated, impactful freshwater restoration efforts across the UK. Looking ahead, Esmée is well-placed to help foster a more cohesive, resilient and well-supported freshwater movement that is equipped to respond to growing environmental pressures while empowering communities and delivering meaningful, long-term change.

## 5. RECOMMENDATIONS

### 5.1 INTRODUCTION

#### **Argument for change**

Based on the interviews, the desk research and analysis, we offer the following recommendations with supporting narrative. These are presented with the following points in mind:

1. Stakeholders value Esmée's current approach and believe they should continue with what they are doing - the approach is popular and can demonstrate success.
2. We assume that the strategy will want to continue to support a wide range of different approaches, as it does now, not least because many other funders do not support this wider approach and because this is part of the Esmée ethos.
3. That community and place-focused approaches will remain part of the 'mix'.

However, the current freshwater context and the learning from this review suggest there is a need to refocus the strategy for the next five years.

The contention is that Esmée should consider taking a more comprehensive focus in fewer places and activity areas and with fewer grantees - concentrating its resources on high priority issues, capturing and sharing the learning more effectively and supporting work to pursue systems change in a small number of key areas.

#### **The needs are urgent**

The context for this review is that progress on improving freshwater quality across the UK has stalled. Even allowing data lags and the age of some Water Framework Directive assessments, there is little sign of meaningful improvement. Without improvement, damage continues to be done to freshwater at a constant rate.

UK conservation organisations speak in terms of a 'nature emergency' with freshwater ecosystems particularly at risk. Climate change is compounding pressures through prolonged dry spells and extreme weather events. Meanwhile, a new UK government has prioritised economic growth and increased house building, which is already increasing pressure on freshwater resources<sup>40</sup> and weakening environmental protections. Changes to planning regulations (through the proposed Planning & Infrastructure Bill) may add further pressures and conservation organisations are worried about potential changes that will be to the detriment of nature and landscapes.

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<sup>40</sup> [Battle begins over new homes approved in historic village without sewage capacity - BBC News](#)

## 5.2 THE RECOMMENDATIONS

The recommendations are underpinned by the ambition to support systems change to address the complex, interdependent challenges facing UK freshwater environments. The contention is that better outcomes can be achieved through focusing on those with proven or emerging potential to drive systemic change, and those effective at building momentum, and cross-sector collaboration, focusing on the interconnectedness of environmental, community, economic and political factors that contribute to the problems. Focus should also be given to creating examples of best practice, providing tangible evidence of change and approaches that can be replicated in other areas and with support from other funders, including green finance investors. This seems to us a way in which Esmée’s relatively limited resources can have a wider and more significant impact.

Grantees themselves offer strong foundations. Their work has helped to build public awareness and demands and momentum for change. The challenge now is to support and strengthen this leadership, help remove systemic barriers and enable deeper collaboration.

There is also a need to offer potential applicants with clearer guidance on the kind of activity that Esmée wants to support over the next five years, whilst retaining flexibility to support innovation and creative responses to complex issues.

### 5.2.1 FOCUS THE FUNDING

Given the urgency and complexity of the challenge, Esmée should concentrate the majority of funding on a smaller number of high impact organisations, offering larger grants and longer-term support to those best positioned to drive systemic change. While continuing to support innovation and new entrants, the balance should shift towards:

- organisations with the strategic capacity to influence policy, practice or regulation
- those acting as catalysts for collaboration, innovation or unlocking resources for the sector
- organisations operating within or across catchments, supporting alignment between campaigners, scientists, policy makers and local communities

We recommend a focus on priority areas such as:

1. Leveraging wider funding, action or influence across the sector
2. Addressing agricultural pollution and encouraging farmer-led collaboration
3. Scaling up citizen science and ensuring the data can be used in decision-making

Esmée should also review its geographic allocations to ensure they reflect areas of greatest environmental need.

### 5.2.2 STRENGTHEN THE SECTOR

Esmée’s support has been critical to enabling NGOs to influence freshwater policy, law and regulation. Building on these strengths, we believe there is more that Esmée could do to build the resilience of the sector, both organisationally and collectively.

We recommend a structured programme for peer learning amongst supported organisations, including country-based in-person events, which could include regular Learning Sessions, a shared digital platform and / or an annual Learning Review to highlight themes, challenges and good practice.

In effect, Esmée's team should play an active role as a well-informed, supportive learning partner, helping to connect, and amplify what works. Some grantees are clearly more geared up for campaigns and advocacy for freshwater than others. Supporting stronger connections between these and other organisations could improve resource use, influence and overall impact.

### 5.2.3 SUPPORT MORE COLLABORATION

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Where practical and useful, Esmée should encourage and require collaboration among supported organisations, particularly in areas with knowledge, data or activity gaps.

There are potential opportunities for greater use of innovative monitoring technologies such as eDNA, monitoring apps, remote sensing, passive sampling and acoustic monitoring to improve data and public engagement. Esmée can help facilitate collaboration and knowledge-sharing across these domains.

### 5.2.4 BROADEN THE DEBATE BEYOND SEWAGE

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The spotlight on sewage pollution has been critical, but Esmée should now help supported organisations expand public and policy attention to broader threats including agricultural and urban runoff and climate-related impact.

This includes support in three interconnected areas:

1. Advocacy and policy to elevate less visible threats (e.g. diffuse pollution)
2. Targeted local initiatives with farmers, land managers, local authorities, and infrastructure operators e.g. National Highways to reduce runoff and improve water stewardship
3. Cross-sector collaboration and public engagement - building joined up action among communities, businesses, food supply chains, water companies and regulators.

This joined-up approach is especially urgent in urban areas, where pressures are complex and further intensified by climate change.

### 5.2.5 GREEN FINANCE MARKETS

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Many supported organisations continue to find green finance markets complex and hard to access. These markets remain underdeveloped and slow to come to fruition at the scale hoped for or needed.

Supply-side support (e.g. investable proposition pipelines) has been valuable, but the priority now is to help embed workable investment models that secure investment from buyers.

Esmée should support advocacy and policy development to unlock investment opportunities, as well as helping green investors to connect more easily with organisations and projects, whether those are place-based or policy focused.

### 5.2.6 ADDRESS KEY DELIVERY RISK

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To improve resilience and impact, Esmée should prioritise funding for capacity building including staff retention strategies and consider making staff training and professional development an explicit area of support, helping organisations to strengthen their teams and improve long-term outcomes for freshwater.

In this context, Esmée should consider a minimum five-year grant period with interim review points for all areas of focus. Longer-term funding reduces delivery risks for the grantees by providing more certainty, helping to retain key staff.

### 5.2.7 PROVIDE A STEER

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A small number of the grantees asked for a clearer idea of what activities Esmée will support in relation to what are very broad objectives or impact measures. Our view is that either the outcome is made clearer, or that potential applicants could ask for further guidance or examples of the activities Esmée will fund. Applicants should be encouraged to show how their work contributes to planned outcomes and how they will measure the extent to which they achieve this.

If we link this to recommendation 5.2.1, then Esmée could redefine the objectives to help applicants and existing grantees to understand the areas of focus.

### 5.2.8 AMPLIFY VOICES

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Consider offering communications support, spotlighting standout projects through Esmée's own channels, or developing a shared campaign platform for aligned grantees. Raising the visibility of effective work will help shape public conversations, attract new allies, influence other funders and increase policy influence whilst reinforcing the credibility and value of Esmée's overall freshwater strategy.

There should be more support to grantees to amplify their voices and extend the reach of their work to the wider freshwater community, including the public and policy makers. This could involve helping them to refine messaging, build media skills, or engage more confidently with decision-makers and the public.

### 5.2.9 CAPTURE AND SHARE LEARNING

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Support grantees to adopt practical, proportionate approaches to learning that focus on outcomes and change. Provide simple tools and guidance to help capture and share lessons learned, encouraging continuous improvement and bringing out valuable insights. We realise that Esmée values a light and pragmatic touch to reporting, something which grantees appreciate, but they also feel that there are missed opportunities in supporting a learning culture. This is something that most NGOs are far more familiar with in recent years and is something that they value i.e. making time to reflect, learn and share.

## APPENDICES

### APPENDIX 1: ORGANISATIONS INTERVIEWED

Action for Conservation  
Afonydd Cymru Wales  
Anglian Water  
Beaver Trust  
Buglife  
Cardiff Water Research Institute, Cardiff University  
Devon Wildlife Trust  
Dyffryn Dyfodol (Future Valley)  
Involving Young People Collective / HUDL Youth Development Agency  
Fishmongers Company  
Greenhouse Communications  
National Trust  
Natural England  
Natural Resources Wales  
Nature Finance  
NatureScot  
North Wales Wildlife Trust  
Northern Ireland Environment Link  
Pembrokeshire Coastal Forum  
River Action  
The Rivers Trust  
Spey Catchment Partnership  
Surfers Against Sewage  
University of Cambridge  
Wales Environment Link  
WRAP  
Welsh Dee Trust  
WildFish  
Wyre Rivers Trust  
Zoological Society of London

## APPENDIX 2: INTERVIEW QUESTIONS

### CHANGING CONTEXT

- Has your organisation's focus in relation to freshwater changed in the last few years? If so, how and why?
- What do you see as the key changes in the sector in (England/ Wales /NI/ Scotland /UK) the last 5 years?
- What has changed in the funding situation in relation to freshwater in (England/ Wales/ NI /Scotland/ the UK) over the last 5 years?

### OPPORTUNITIES

- Thinking about Esmée's impact goal, what do you see as the opportunities or drivers for progress in England/ Wales / N Ireland/ Scotland / the UK?
- Do you see these drivers getting weaker or stronger in the next 2 to 3 years? If so, in what ways, and why?

### BLOCKERS

- What do you see as the major blockers to progress in achieving cleaner/ healthier freshwater in England/ Wales / N Ireland/ Scotland / the UK?
- Do you anticipate these becoming weaker or stronger in the next 2 to 3 years? If so, how and why?

### ESMEE FAIRBAIRN FOUNDATION'S ROLE

- What implications do changes in the funding situation for freshwater have on the need for Esmée's support?
- How can Esmée achieve and demonstrate better outcomes in relation to freshwater/ freshwater habitats?
- Where can Esmée add most value and what kind of activity and organisations should Esmée prioritise?
- If your organisation is a recipient of funding or other forms of support from Esmée for, what difference has it made to your work and impact in relation to freshwater?
- What has been good about the way Esmee has worked and what could be improved?

### FINALLY

- What else would it be useful for me to know for this review that I have not asked about so far?