



Secretary of State for Environment,
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WRMP, C/o Water Resources Policy, Area 3D
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Revised draft Water Resources Management Plan 2019 - Protocol for addressing security and commercial-in-confidence issues in compliance with Security & Emergency Measures Direction 1998.

Dear Sir,

I refer to the requirements within the Security & Emergency Measures Direction 1998 and associated Advice Notes to manage water company sensitive information in relation to the publication of Thames Water's revised draft Water Resources Management Plan 2019 (draft WRMP19) for public consultation.

National Security

Water companies have a duty to publish Water Resources Management Plans (and Drought Plans), but the plans may contain information that could be considered sensitive on grounds of national security.

Our Strategy, Planning and Investment team were briefed on the relevant security restrictions prior to commencing the programme of work to produce our draft WRMP19, in order that they could produce original documents that met all parties, including the public's needs. Our draft WRMP19 was therefore written to ensure that the following sensitivities were not published:

- a. Security controls too detailed
- b. IT/process, controls too detailed
- c. Emergency response too detailed
- d. Location too specific
- e. Sensitivity to site information
- f. Impact too detailed
- g. Impact information too much in aggregation
- h. Vulnerability too detailed
- i. Vulnerability information too much in aggregation
- j. Sensitivity to asset information, such as 'toxic gas stores'

For a final review of the draft WRMP19 documentation Thames Water's Business Resilience and Security team contracted with Halcrow Management Sciences Limited to provide appropriately trained, cleared and experienced personnel to carry out a formal review. Thames Water briefed Halcrow Management Sciences Limited on the specific site and issue sensitivities for Thames Water. Halcrow Management Sciences Limited completed their review in November 2017 and provided a Certifier's Statement of Compliance, a copy of which was attached to our letter dated 1st December 2017. We have since undertaken a public consultation on our draft

WRMP19 starting in February 2018 and ending in April 2018. We have reviewed all the feedback received from stakeholders and customers and prepared a document called the Statement of Response, which sets out our consideration and response to the comments received. We will publish this in early September 2018 alongside setting out the changes we have made to our plan in the revised draft WRMP19. The process for updating the draft WRMP19 documentation is consistent with the previous work and we can confirm that no material security changes have being made for the revised draft WRMP19.

Commercially sensitive information

To meet the requirements of the guidelines our submission includes cost information of our options and third party options within the tables. Any third party information utilised within these tables has had disclosure agreement from any third party, and will not be seen in the public domain tables. Our plan will not disclose any information that would be considered commercially confidential

Additional 'viewing' of sensitive information

We anticipate that the Environment Agency and regulators will request to see detailed supporting information, particularly that contained within our Strategic Environmental Assessment and Option Engineering Dossiers. We are intending to manage this through the use of organisational and/or individual confidentiality undertakings. We also plan to host arrangements at our offices for other stakeholders to access and read the information as required. This is in line with the general principles previously agreed by CPNI (Thames Water's Sensitive Security & Resilience Information Disclosure Process).

Compliance

I am satisfied that Thames Water Utilities Ltd Draft Water Resources Management Plan 2019 has been prepared:

1. In accordance with the Control of Sensitive Water Company Information – Advice Note 11 Edition 5 DEFRA February 2016 (AN/11)
2. In accordance with the Environment Agency Water Resources Planning Guideline: Interim update, April 2017

I can therefore certify that our revised draft WRMP19 has been reviewed and that it does not contain:

1. Any information that would compromise national security interests.
2. Any information that would be considered commercially confidential

Yours faithfully,



Chris Fitzgerald
Head of Business Resilience and Security
On behalf of Thames Water Utilities Limited