

# Sustainable Bond Impact Report

2021

from Southern Water

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# Introduction

Welcome to our Sustainable Bond report. In this report, we outline how our sustainable finance is helping to achieve our vision to create a resilient water future for our customers in the South East. Our purpose to provide water for life while enhancing health and wellbeing, protecting and improving the environment and sustaining the economy, benefits the communities we serve and the biodiverse nature and wildlife living all around us.

We provide water to millions of people in the water stretched area of the South East. For our customers, ourselves and future generations, we have a responsibility to protect and respect the environment in which we live and work. Our ability to act responsibly when facing the current and projected environmental and climatic changes, is crucial to developing a strong and sustainable water system for the South East.

Our sustainability ambitions are firmly rooted in our precious natural capital – our rivers, reservoirs and seas and the biodiverse environment around them. We have committed to zero pollution by 2040 and we are working towards reaching net zero carbon emissions by 2030. Our **Sustainable Financing Framework**, which was developed in accordance with the ICMA's Green bond and Social bond principles, sets out our approach.

The Sustainable Financing Framework enables us to issue green bonds, social bonds or both. Sustainability bonds therefore present opportunities through the inclusion of social categories in addition to the environmental aspects of the Green bonds. The social categories mean that support can be given to vulnerable customers, as well as ensuring access to affordable infrastructure and essential water and wastewater services.



lan McAulay Chief Executive Officer

> Sebastiaan Boelen Chief Financial Officer

**Dr Toby Willison** Director of Environment and Corporate Affairs

We raised sustainable bonds in two issuances – two bonds in May 2020 and one in March 2021 with a total value of £1.125 billion. £350 million of this total was to refinance projects completed in the 2020–25 Asset Management Period (AMP6) with the remainder to support the funding of projects in the following five year investment period (AMP7).

Our investors are committed to the environmental, social and governance (ESG) responsibilities that are at the core of a twenty first century water company.

Acting sustainably is increasingly challenging given society's growing demands for water against the backdrop of climate change. In the South East we can expect to have more people and less water in the future. Our Climate Change Adaptation Report presents our latest climate risk assessment. It looks at the business impact of a temperature rise of two and four degrees and how we will work to mitigate the short, medium and long-term risks. The report was made available in November for stakeholder consultation, in advance of submitting it to Defra in December – visit: southernwater.co.uk/climate-changeadaptation. Reporting our risk and performance commitments transparently and regularly is key to our ability to operate effectively and responsibly, as well as providing the public value that our customers deserve. Our board have committed to being completely open and transparent in the upcoming industry-wide investigation into the operation of wastewater treatment works, launched jointly by the Environment Agency and Ofwat in November.

The Environment Agency's legal case resulting in a fine for Southern Water in July this year, reflected the seriousness of the environmental pollution we caused from illegal sewage spill incidents from 2010–15. Our regulators have made it clear that we need to learn from past mistakes and continue to transform our business and our culture, aligning with our company values of doing the right thing, always improving and succeeding together.

Moving forwards, we want to show that we are acting responsibly at all times and meeting or exceeding our customer's expectations. Our Pollution Incident Reduction Plan sets out how we will make progress to reduce pollution incidents, and we have set up a task force on Combined Sewer Overflows (CSOs) to address the challenges associated with pollution caused by storm releases.

Our commitment to being transparent about our performance, can be seen clearly on our website. The website is regularly used to access the latest updates. Information about pollution incidents, flow and spill reporting, wastewater treatment works compliance, regional bathing water compliance results, emissions and river levels can be found there. We're currently investing £600 million in environmental improvements that will benefit our communities. A significant part of this has come from the sustainable bond investments that we have made. We know that challenges, such as impact from climate change, can be balanced by the opportunities that innovative investments can bring.

Investing in sustainable bonds looks set to become the way forward in our industry and we are pleased to be able to optimise our bond investments to create a sustainable, water resilient future for our communities to enjoy. We anticipate that future financing needs will be fulfilled with sustainable finance, either via bonds or other debt instruments. As we embark on this sustainable finance journey, we are committed to keeping investors informed of progress and its associated impact, and will produce this impact report on an annual basis.

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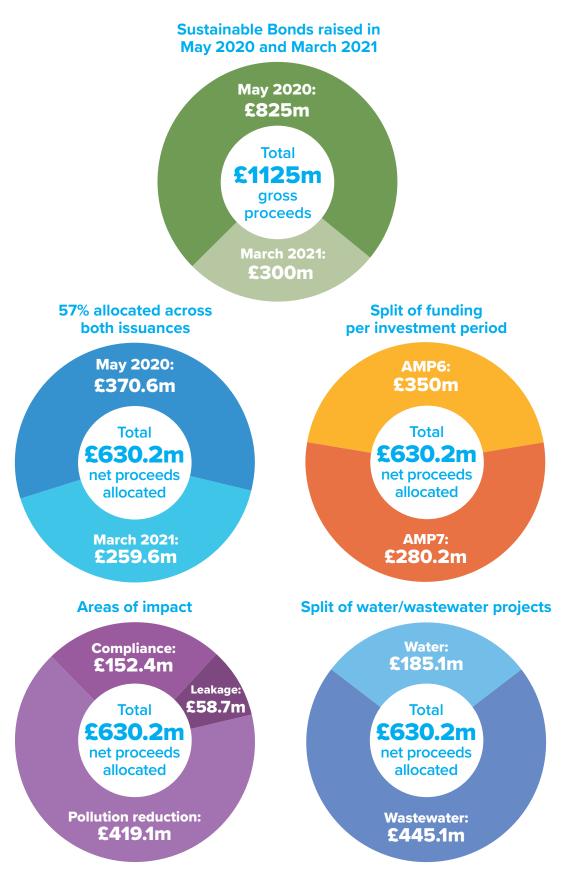
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# Key highlights

All the sustainable bonds are public issuances and have tenures ranging between six years to 17 years.



# Progress in allocation of sustainable bonds

# This report covers the impact of the allocation of projects up to and including 31 March 2021.

The allocated projects are grouped into three main areas, which correspond to the performance commitments set by our regulators for pollution control, compliance and leakage reduction. Our performance against the Operational Delivery Incentives (ODIs) within each of the three areas is shown on page 10.

Examples of projects can be found below:

- Compact treatment works underground
- Reservoir works
- · New connections work
- Breaking down the run-offs from farms
- Replacement of failed linings in antiquated sewers
- Improving the quality of sewers

As at 31 March 2021 a total of 109 projects within the current Asset Management Programming Period (AMP 7) have been allocated to the sustainable bonds issued in May 2020 and March 2021. Part of the May 2020 bonds were used to refinance 16 projects from the last finance programming period (AMP 6). In total £630.2 million has been allocated to our sustainable bonds. For AMP7, funds have mainly been allocated to projects that are in their early stages of delivery (in many cases in the first year of delivery) so the volume of projects allocated were 109 compared to the allocated value of £280.2 million.

For AMP6, funds were allocated to projects that were completed in the previous five year cycle and therefore the volume of projects was low but the value high at 16 projects for a value of £350 million.

#### Our five year strategy

- Use water wisely
  - Fit for the future
- - **Deliver great service**

Protect and improve the environment

#### Green bond definition

Green bonds are any type of bond instrument where the proceeds or an equivalent amount will be exclusively applied to finance or re-finance, in part or in full, new and/or existing eligible Green Projects (and which are aligned with the four core components of the Bond principles.

#### Social bond definition

Social bonds are any type of bond instrument where the proceeds or an equivalent amount will be exclusively applied to finance or re-finance, in part or in full, new and/or existing eligible Social Projects and which are aligned with the four core components of the Bond principles.

#### Sustainability bonds

Sustainability bonds are bonds where the proceeds will be exclusively applied to finance or re-finance a combination of both green and social projects.

# We provide water for life to:

enhance health and wellbeing

protect and improve the environment

sustain the economy

Committed to reaching net zero by 2030 The four core components of the bond principles are:

1. Use of Proceeds.

2. Process for Project Evaluation and Selection.

3. Management of Proceeds.

#### 4. Reporting.

Where our projects fall within one or several Social categories as well as one or several Green categories we refer to these as Sustainable investments. For this inaugural impact report, all the individual capex projects that have been allocated up to now, to our Sustainability bonds, have met the criteria for allocation to our sub portfolio of both Social and Green, so we refer to them as Sustainable investments.

Matrix category	Sustainability criteria			
Social	Affordable Basic Infrastructure			
	Access to Essential Services			
	Food Security			
	Socioeconomic advancement and empowerment			
Green	Renewable Energy			
	Energy Efficiency			
	Pollution Prevention and Control			
	Sustainable Water and Wastewater Management			
	Environmentally Sustainable Management of living natural resources and land use			
	Climate Change Adaptation			
	Eco-efficient and/or circular economy, adapted productions, production technologies and processes			

Given the large number of projects that have been financed, we are reporting on a portfolio level. The net proceeds arising from these have been, and will continue to be, allocated to investments in Eligible Projects in line with our Sustainable Finance Framework, therefore providing additional impetus to delivering our vision to provide a resilient water future for our communities. We anticipate allocating all of the remaining proceeds of these bonds by March 2023 as the pipeline of projects is more than sufficient to cover this. Two key projects are highlighted as case studies (see page 16).

Regarding return on investment, the bonds give 2.375% and 3.000% return to investors for the May 2020 bonds (£375 million and £450 million respectively), and 1.625% for the March 2021 bonds.



Our Sustainable Finance Framework was independently verified by DNV and their opinion can be found on our website at **southernwater**. **co.uk/dnv-opinion**.

This report describes our use of proceeds to date, and the expected sustainability impact of these investments. This report describes our use of proceeds to date, and the expected sustainability impact of these investments. The report was verified by DNV and their opinion on this report can be found at **southernwater.co.uk/dnvassurance**.

For further details on this financing approach, please see our Sustainable Finance Framework, published in 2020.

Our Sustainable Finance Framework was developed in alignment with the ICMA (International Capital Market Association) principles:

- Green Bond Principles
- Social Bond Principles
- Sustainability Bond Principles

and the Loan Market Association's:

- Green Loan Principles
- Sustainability Linked Loan Principles
- KPIs

# Key deliverables

### Committed to:

# pollution

incidents to less than 80 by 2025, aiming for zero pollution by 2040.

# Aiming for a score of zero for drinking water

## compliance

risk and 100% compliance with Environment Agency standards for treatment works. Halving leakage by 2050 and reducing

## leakage

by 15% over the five years from 2020 to 2025.

## Our investment is planned to acheive our goals and the performance commitments set for us by our regulators.

We have mapped the allocated projects into three categories of impact: pollution prevention, regulatory compliance and leakage reduction.

The levels of performance in these three areas, that the allocated sustainable investments contribute to, were reported in our Annual Performance Report 2020–21 and can be found below.

#### Pollution

Pollution incidents are measured in:

- The number of Category 1-3 pollution incidents
- The number of Category 1-3 pollution incidents per 10,000km of sewers as reported in the Environmental Performance Assessment

We had 402 reportable incidents in 2020, which was above our target of 98 incidents. Our target is equal to 24.51 incidents per 10,000 km of sewer. We had 101.52 incidents per 10,000 km of sewer, based on a total sewer length of 39,600km.

#### Compliance

Water and wastewater compliance are both monitored.

**Water compliance:** The Compliance Risk Index (CRI) – this is a measure designed to illustrate the risk arising from treated water compliance failures, and it aligns with the current risk based approach to regulation of water supplies used by the Drinking Water Inspectorate (DWI). All compliance failures are assessed and scored by the DWI. Our CRI end of year score was 4.53. This is an improvement on our 2020 score of 7.66.

**Wastewater compliance**: Wastewater Treatment Works Compliance – Compliance in this area is about maintaining and improving our wastewater treatment works, aiming for 100% compliance with Environment Agency standards. We did not achieve this target during 2020–21 as a result of 10 failed works which resulted in 97.06% compliance.

We aim to reach zero compliance failures.

#### Leakage

The company's level of leakage, including customer supply-pipe losses, is measured as a three year rolling average, expressed in megalitres per day (MI/d). IIn 2020-21, we were just over our three-year rolling average leakage target of 97 MI/d, with a score of 98.5 MI/d.

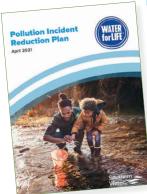
The total level of leakage, including customer supply-pipe losses, is also measured and

expressed in megalitres per day (MI/d). We aim to reduce leakage to 84.9 megalitres per day (MI/d) by 2025. Our leakage performance for 2020–21 was 98.4 MI/d.



Metrics as submitted to Ofwat in our Annual Performance Report 2020–21

The sustainable bond allocations are made to a portfolio of eligible projects within our wider investment works and project programmes.



## Pollution Incident Reduction Plan

We were one of the first UK companies to publish a Pollution Incident Reduction Plan (PIRP) in September 2020. The plan outlines how we are actively

investing in our capital maintenance, using digitisation and improving our incident response.

## One of the first UK companies to publish a Pollution Incident Reduction Plan

### **Net Zero Plan**

We published our Net Zero Plan in July 2021 showing how we are working to reduce, replace,

remove or offset carbon emissions. This followed our involvement with Water UK's routemap, which shows the pathway for water companies.



We are committed to reaching net zero operational carbon emissions by 2030, twenty years ahead of the UK government's commitment. Reducing greenhouse gas emissions and lowering the carbon footprint are vital elements in our plan.

### **Climate Change Adaptation Report**

Our Climate Change Adaptation Report assesses the risks from a rise in temperature of two degrees and four degrees due to climate change. The report looks at how we are adapting our operations to mitigate risk to water and wastewater treatment processes during periods of extreme weather causing:

- Increased temperature and more extreme variation in temperature.
- Less rainfall or longer dry periods (drought).
- More rainfall, or more intense rainfall (increased storminess).
- Sea level rise.

#### Drainage and Wastewater Management Plans

A stakeholder consultation took place in 2021 on our Drainage and Wastewater Management Plans (DWMP). There are 11 plans being developed covering the river basin catchments from across our region, to improve water quality and drainage while reducing flooding and pollution across the whole area that we serve. The plans look ahead for twenty five years or more, and our Resilience Action Plan shows how we will take steps to reduce risks going forwards.

Our Sustainable Drainage 2030 programme will lead us to use new technology and data analytics to improve our ability to manage capacity in our network and reduce risks from more extreme weather.

## Reduce and Avoid

emissions through efficiency savings.

## **Replace:**

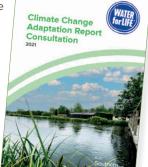
use alternative solutions that are lower carbon, for example technology change.

## Remove

emissions through sequestration (the removal of  $CO_2$ from the atmosphere by plants and micro-organisms and its storage in biomass or the soil) on our estate.

## Offset

any residual emissions through the use of responsible carbon offsetting.



# Impact of schemes supported by our sustainable bond investment

The impact results presented in this section of the report are the overall results of our programmes and activities as reported in our Annual Report and Financial Statements 2021. We do not currently forecast or estimate the expected future aggregated impacts of our investments.

## Pollution reduction: Allocated amount £419.1 million

Water is a precious natural resource that flows through beautiful stretches of our countryside and coastline. This environment is home to a biodiverse group of wildlife and plants, providing important habitats for nature to thrive as well as giving us a space to enjoy.

We want to reduce pollution incidents by 80% by 2025 We have a duty to protect the environment from any negative impacts of our operation as well as to help improve it for the future generations of people in our community.

Customers want us to protect the environment while we provide our services. Making sure that we reduce pollution incidents is fundamental to keeping our rivers, reservoirs and bathing waters clean and healthy. We are committed to:

- cutting pollution incidents by 80% by 2025
- reducing pollution incidents to zero by 2040

In order to achieve our pollution reduction goals, we published our Pollution Incident Reduction Plan in 2020 and we were one of the first companies to do so. The plan is based on extensive data analysis and industry best practice. It focuses on wastewater pumping stations and wastewater treatment works, as this is where we have seen the largest increase in pollution incidents since 2018.

Our Annual Performance Report for 2020–21 reported that we had 101.52 incidents per 10,000km based on the 402 reportable pollution incidents that year. We received the maximum penalty due to our total figure and we are expecting to remain in the penalty space during the current Asset Management Period of 2020–25. Advances in our incident management processes and the success of our improved self-reporting culture have started to have a positive impact on our results in this area.

We continue to monitor our CSOs and have set up a CSO task force to look at the challenges in this area.

It is clear that pollution reduction is an area where we want to make significant improvements, and our sustainable bond investment will help us to achieve our goals.

Our work in this area means:

- reduced pollutions
- investment in greater operational efficiencies
- pollution prevention and flooding control and compliance.

It is an obligation for all water companies to monitor and report the number of pollution incidents. Our **annual pollution figures** are published on our website, showing which category of incident has occurred.

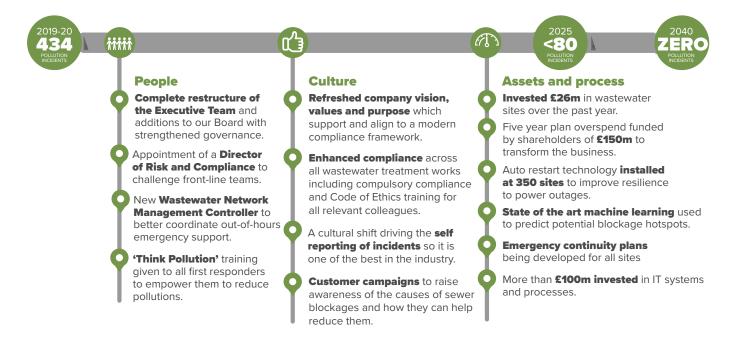
Our online platform Beachbuoy, provides updates about any screened water releases into the environment and our Beauty of the Beach campaign encourages everyone who uses our beaches and bathing waters to help keep them clean.



To avoid houses and businesses getting flooded when we have severe, heavy rain, our CSOs act as the release valve for excess water in the sewers – mainly rainwater – going out into the sea. All 83 of our bathing waters comply with European quality standards, with 'Excellent' water quality status at 58 beaches designated for swimming in our region, and we want to make sure that we protect these important coastal areas and increase the water quality still further with our Bathing Water Enhancement Programme.

We know that any internal sewer-flooding incident is distressing and disruptive for customers. Blocked pipes can cause sewage to back up into peoples' homes. Our FOG (Fat, Oil and Grease) campaign informs people about restricting what goes down their waste pipes to pee, poo and paper only. We held a European FOG summit in October to highlight the challenges. We have a duty to protect the environment from any negative impacts of our operation as well as to help improve it for the future generations of people in our community

We've set an ambitious target to reduce pollution incidents to zero by 2040:



# Impact of schemes supported by our sustainable bond investment continued

## Compliance: Allocated amount £152.4 million

# Sustainable bonds investment for projects in this area cover both water and wastewater.

Providing clean and safe drinking water is fundamental to our role. Water quality is monitored by the DWI's (Drinking Water Inspectorate) Compliance Risk Index (CRI). The measurement is about the number of times the company is contacted by customers per 1,000 population due to drinking water not being clear or due to the taste and odour of drinking water.

We are committed to:

• reaching a target level of 4.6 contacts per thousand people regarding the taste odour and appearance of our drinking water.

The Drinking Water Inspectorate (DWI) carries out stringent water quality tests to ensure the high standards expected. As well as monitoring water at customers' taps, we monitor water quality at treatment works and treated water storage facilities. During 2020, 248,000 water quality compliance samples were taken and 36 were found to not meet the required standards – many of these were due to customer plumbing issues that we were able to help resolve.

Our customers value the high quality drinking water we provide. Compliance measures ensure that water is clean and safe, as well as monitoring how it looks, tastes and smells. Our projects in this area promote:

- Improved drinking water quality
- Greater operational efficiency

Information is provided on our website about why there may be changes to the taste, smell or appearance of tap water and a specialist panel carries out quality control tests to measure the level of taste and odour in the water we provide.

Treatment Works Compliance is key to making sure that our wastewater plant maintenance and improvements comply 100% with the Environment Agency's standards.

As well as monitoring water at customers' taps, we monitor water quality at treatment works and treated water storage facilities

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## Leakage: Allocated amount £58.7 million



# Saving water will help us to keep more water in the supply.

Water saving can be done by us as a company by reducing leakage, and by our customers in their own homes. Having less need for water means that we can take a smaller amount from the region's rivers and underground aquifers. This keeps more available to serve our increasing population, particularly with the drier, hotter summers we are increasingly experiencing with climate change.

A consistent reduction in leakage is our aim. New technology has been helping us meet our leakage reduction ambitions. We have rolled out advanced pressure management and acoustic logging sensors to detect potential leaks. This means that we can quickly send out our find-and-fix teams and complete leak repairs effectively. We installed 7,400 acoustic loggers on our network in 2020–21 and completed 20,000 leak repairs during that time. Reducing leakage means that we reduce the amount of water wasted when pipes burst or equipment fails.

Projects in this area achieve:

- Improved water efficiency
- Increased capacity for population growth

The disruption to customers from a leakage incident can be significant and range from water supply interruption to roadworks. We always put the customer first when there is an incident, and we provide bottled water if the supply is interrupted, with vulnerable customers identified in advance to make sure we provide everyone with their essential water source.

We are aiming to reduce leaks by half by 2050

# Investment and the governance process

There is a rigorous review and approval process to ensure strong governance over the approval of all our new capital expenditure projects and budgets.

The majority of Southern Water's asset (capex) and expenditures (opex) fall within the eligible Green Bond categories and the Social Categories taken from the ICMA's Green Bond principles and the Social Bond principles. At this time, and in accordance with our Southern Water Sustainable Financing Framework, we have decided to allocate funding to our capex portfolio only.

Projects that meet a certain value threshold are delegated for review and approval by our Investment Committee, prior to review by the Board for final approval. Investment in our assets is proposed through business cases that outline the costs and benefits of the investment. These business cases are approved by different boards or 'gateways' as they progress.

The process includes:

- risk identification
- · solution selection
- · cost and benefit analysis.

#### Our sustainable bond impact process

#### **Evaluation**

of business cases ICMA's green bond principles applied

#### **Measuring outcomes**

Outcomes of each area measured in performance commitments set by regulators in our Outcome Delivery Incentives (ODIs)



each gateway and throughout the life cycle of the project until completion. Southern Water's Board approves the annual capital expenditure budgets and also the five-year AMP plans. The relevant Steering Group approves all capital expenditure and the level of management approval is determined by project value and our schedule of delegated authority. The majority of our capital expenditure qualifies

Our water and wastewater strategy groups have

ensure that projects deliver the best outcomes

for customers. There is continuous monitoring at

oversight of the whole capital programme and can

for inclusion under the ICMA criteria and certain types of expenditure are specifically excluded. Excluded spend includes personal costs, fines and legal costs associated with pollution incidents and also financing costs which includes costs associated with raising finance. Southern Water uses the debt raised from our Sustainable Finance Framework to finance and refinance assets that fall within the Eligible Sustainable Portfolio.

Our sustainable bond framework has been reviewed by DNV which has issued a Second Party Opinion.

Our water and wastewater strategy groups have oversight of the whole

capital programme and can ensure that projects deliver the best outcomes for customers

# **Project selection and allocation**

## Projects are assessed for their eligibility to the portfolio by a committee consisting of members from our Treasury, Strategy and ESG teams.

The assessment takes into account our purpose, the type of project, how the project aligns to the ICMA Social and Green principles, as well as how well the project contributes to our environmental and social ambitions. There is a description of the project and the likely impact. An assessment score is then attributed to the project.

For allocation to the bonds, the projects need to meet a minimum number of social and

environmental criteria and have a capex addition value of above £500,000 in the year. The capital project values include an allocation of corporate overheads but do not include capitalised interest. The allocation process looked at both refinanced capex projects from AMP6 (the period 2015–20) and also new capex projects in the period 1 April 2020 to 31 March 2021. Projects that are allocated are flagged in our capex portfolio reporting system to ensure there is no duplication in future allocations.

The table below summarises the amounts raised from each Bond and the allocated amounts as at 31 March 2021 as well as the allocation into our three mains areas of impact.

#### Sustainability Bond Allocations 1 and 2 Summary

lssued	May 2020	May 2020	Mar 2021	
Reference	A12	A13	A14	
ISIN	XS2180916525	XS2180916871	XS2325617939	
Nominal O/S £m	375	450	300	
Loan type	Sustainable Bond	Sustainable Bond	Sustainable Bond	
Coupon	2.375%	3.000%	1.625%	
Maturity	May 2028	May 2037	March 2027	
				Total
	£m	£m	£m	£m
Net proceeds	370.6	444.3	295.2	1,110.1
Refinancing of capex projects from AMP6	350.0	_	_	350.0
New capex projects AMP7	20.6	259.6	_	280.2
Total allocated as at 31 March 2021	370.6	259.6	_	630.2
Total to be allocated in future periods	_	184.7	295.2	479.9
Allocated %	100.0%	58.4%	-	<b>56.8</b> %
Impact allocation:	£m	£m	£m	£m
Pollution reduction	258.7	160.4	_	419.1
Regulatory Compliance	74.6	£77.8	_	152.4
Leakage	37.3	£21.4	_	58.7
Total	370.6	259.6	_	630.2
Water	82.4	102.7	_	185.1
Waste	288.2	156.8	_	445.1
Total	370.6	259.6		630.2

# Management of proceeds

The proceeds will be used to finance, refinance or invest in eligible projects or programmes of work that meet our eligibility criteria.

If there is any occasion where proceeds from an issuance cannot be immediately allocated to finance, or refinance projects, the funds will initially be placed as deposits with money market funds or bank counterparties in accordance with our Treasury Policy. We will then ensure these funds are not used for any projects or programmes of work that are contrary to our sustainable financing framework.

# **Case studies**

## Case study 1

## **Improving river water quality and reducing odours** Woolston: Impact > Reducing pollutions Amount: £96 million

## Our Woolston Wastewater Treatment Works went through a major improvement programme during 2020–21.

The improvements aimed to raise the quality of effluent discharged into the River Itchen and reduce odours from the site.

The programme took place in phases, so that a temporary treatment works could be built and used while the old works were upgraded.

Customer complaints about odours from the old works were addressed by replacing the open air tanks – where most of the odours came from – with new treatment processes that are fully odour-controlled and contained within the building. Advanced technologies have also been built into the site, including the largest Membrane Biological Reactor (MBR) in the UK. This is a filtration system of membranes that measure a total length of more than 7,700 kilometres.

> As part of the programme, we set up a Community Liaison Group with local community groups and Southampton City Council to give regular progress updates to the community and receive feedback from them.

The improved works now fully treat flows close to 37 megalitres of wastewater per day (MI/d).

The site was completed on behalf of Southern Water by our partners 4Delivery – a joint venture between Veolia Water Technologies, Costain and Stantec UK.

## Case study 2

## Leakage reduction

## Impact > reducing water usage Amount: £37 million

This programme of works includes the replacement of stop taps, communication pipe replacement and supply demand management.

Collectively these improve water efficiency and contribute to our efforts to reduce leaks by 50% by 2050.

This infrastructure programme of works is just one example of our approach to reducing leaks. We are also investing in innovative technologies such as acoustic loggers, which help us to identify leaks more accurately. To reach our 2050 target of halving leaks, we have set goals of a reduction in leaks of 15% by 2025 and 40% by 2040. We are on track to achieve these goals.

> Reducing leakage is key to making our use of this precious natural resource more sustainable. Losing water through leaks means that we have to take more water from the environment and use more energy in our treatment processes than we would otherwise have to. In the water stretched South East, where the population is growing,

this is particularly important.



Southern Water Southern House Yeoman Road Worthing West Sussex BN13 3NX Registered no: 02366670

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