



Secretary of State for Environment,
Food and Rural Affairs
WRMP, C/o Water Resources Policy, Area 3D
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Chris Fitzgerald
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1st December 2017

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 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 Assurance 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 has therefore been written to ensure that the following sensitivities are 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 the final documentation review 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 the final formal review. Thames Water briefed Halcrow Management Sciences Limited on the specific site and issue sensitivities for Thames Water. Halcrow Management Sciences Limited completed the review in November 2017, they have provided recommendations for redaction of information, we have responded to these recommendations, as summarised below:

- We will not publish Appendix R – Scheme Dossiers
- We have made revisions to the wording of Section 7: Appraisal of resource options, Section 9: Environmental appraisal and Appendix K: Process losses

Halcrow Management Sciences Limited has provided a Certifier's Statement of Compliance, a copy of which is attached with this letter.

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 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

RESTRICTED

Security & Emergency Measures Direction 1998

**Thames Water Utilities Limited
Draft Water Resources Management Plan 2019
Certifier's Statement of Compliance**

Thames Water Utilities Limited made its Draft Water Resources Management Plan 2019 and Appendices (versions as at 27 November 2017) available for review against the requirements of the following documents:

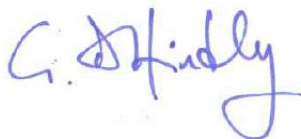
The Control of Sensitive Water Company Information – Advice Note 11 Edition 5 Defra February 2016 (AN/11)

Guidance to Water Companies on the release of security sensitive information (Defra May 2012)

A review of the Draft Water Resources Management Plan 2019 and Appendices AA, B, BB, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X and Y was completed by CH2M's SEMD Certifier in November 2017.

In providing this Statement, in relation to the Draft Water Resources Management Plan 2019, requirements of AN/11 and Defra's guidance, I confirm:

- Appropriate information management arrangements are in place to control and anonymise sensitive site-specific information.
- Sensitive site-specific information has been removed from the public documents or presented in a non-specific manner from maps, network configurations, descriptions of water resource zones & sources of water supply, capacities of defined sources & treatment works, data tables and technical reports.
- The documents meet the requirements of AN/11.
- Thames Water does not intend to publish Appendix R.
- Thames Water's Head of Business Resilience and Security has confirmed the plan has been reviewed and that it does not contain any information that would compromise national security interests.



G D Hindley
SEMD Certifier
01 December 2017

Halcrow Management Sciences Limited,
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