

August 2026

Addressing flow limiters in the Environmental Incentives Common Framework

About this document

Rule 51 of the Charging Rules for New Connections Services (English Undertakers) ([ENCR](#)) states that each water company must offer environmental incentives, in line with the principles published by Ofwat in the Environmental Incentives Common Framework ([EICF](#)).

This document consults on what we should include in the EICF about flow limiters (defined to include both flow regulators and flow restrictors).

Our consultation relates to water companies wholly or mainly in England ([English companies](#)).

Water reforms

Ofwat is working with the UK and Welsh governments on the implementation of water reforms, while strengthening our collaboration with partner regulators.

Until these new arrangements are in place, we will keep working hard to drive water companies to improve performance and deliver maximum value for customers, communities, and the environment.

Executive Summary

In this consultation we ask how the [Environmental Incentives Common Framework \(EICF\)](#) should refer to flow limiters (devices that reduce flow through a pipe, including both flow regulators and flow restrictors). Specifically, we consider the role that flow limiters might play in helping developers qualify for environmental incentive payments.

To help inform views on this question, this document explains the purpose of the EICF, the role that flow limiters can play in increasing water efficiency, and summarises feedback from water companies on how they currently address flow limiters in the design and administration of their environmental incentive payment schemes.

We issue the EICF under our [Charging Rules for New Connection Services \(English Undertakers\) \(ENCR\)](#). It sets out a common approach to the design and delivery of the environmental incentive payments that water companies offer developers. It does not currently refer to flow limiters. This means water companies have taken different approaches to the use of flow limiters by developers.

The four options set out in this consultation seek to address this inconsistency by providing clear guidance on flow limiters in the EICF. The options differ on the nature of that guidance. Our preference is option two, which would clarify that developers can use flow limiters to achieve compliance with flow rates set for environmental incentive payments under the EICF.

We seek feedback on the options we propose, and on other points, as set out in table 1.

Table 1: Consultation questions

Number	Question
Q1	Have we identified and accurately characterised the types of flow limiters in the market? Do you agree we should include definitions in the EICF?
Q2	What approach does your company take to flow limiters under the EICF? What is this approach informed by?
Q3	Have we correctly captured the concerns about flow limiters? Are there other issues we should be aware of?
Q4	What are your views on our preferred option (option 2) and the other options we have set out to provide guidance in the EICF on the use of flow limiters? Are there other options that you would prefer?
Q5	What are your views on the draft text illustrating how option 2 could be included in the EICF, set out in Box 1. Does it achieve the intended effect of option 2?

Responding to this consultation

We welcome any responses to this consultation. Please email your response to charging@ofwat.gov.uk.

The closing date for this consultation is **9 September 2026**.

We may publish responses to this consultation online, on the relevant consultation platform. Subject to the following, by providing a response to this consultation you are deemed to consent to its publication. If you think that any information in your response should not be disclosed (for example, because you consider it to be commercially sensitive), you should identify specific information and explain in each case why it should not be disclosed and provide a redacted version of your response. An automatic or generalised confidentiality disclaimer will not, of itself, be regarded as sufficient. We will consider your request when deciding what information to publish. At a minimum, we would expect to publish the name of all organisations that provide a written response, even where there are legitimate reasons why the contents of those written responses remain confidential. In relation to personal data, you have the right to object to our publication of the personal information that you disclose to us in submitting your response (for example, your name or contact details). If you do not want us to publish specific personal information that would enable you to be identified, our privacy policy explains the basis on which you can object to its processing and provides further information on how we process personal data.

In addition to our ability to disclose information pursuant to the Water Industry Act 1991, information provided in response to this consultation, including personal data, may be published or disclosed in accordance with legislation on access to information – primarily the Freedom of Information Act 2000 ([FoIA](#)), the Environmental Information Regulations 2004 ([EIR](#)) and applicable data protection laws.

Please be aware that, under the FoIA and the EIR, there are statutory Codes of Practice which deal, among other things, with obligations of confidence. If we receive a request for disclosure of information which you have asked us not to disclose, we will take full account of your explanation, but we cannot give an assurance that we can maintain confidentiality in all circumstances.

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1. Introduction

This consultation provides options for referring to flow regulators and flow restrictors (together, "**flow limiters**") in the Environmental Incentives Common Framework (**EICF**). Flow limiters are devices that reduce the flow of water through pipes and fittings. We say more about them in section 3.1.

Our intention is to support consistency between water companies and provide certainty to developers about using flow limiters to qualify for environmental incentive payments under the EICF.

Currently, the EICF does not refer to flow limiters. They were not part of the original development of the EICF by the sector working group and stakeholders did not raise them in response to our consultations in 2024. However, we were informed in October 2025 that water companies are taking different approaches to the use of flow limiters by developers, and this is creating inconsistency for developers that operate across multiple companies' areas.

We want to address this inconsistency by providing a clear steer in the EICF about the use of flow limiters by developers to help meet water efficiency standards under the EICF and qualify for environmental incentive payments. We have identified four options for potential amendments to our EICF, outlined in this consultation. Our preference at this stage is option 2, amending the EICF to allow developers to use flow limiters to achieve compliance with environmental incentive standards.

The rest of this document is structured as follows:

- In section 2 we explain the background to the EICF.
- In section 3 we provide context on flow regulators.
- In section 4 we outline options for amending the EICF.

2. The Environmental Incentives Common Framework

This section briefly explains the **EICF** in the context of water scarcity challenges, and provides an update on its progress one year after its establishment.

2.1 Purpose of the EICF

The EICF came into effect in April 2025. It resulted from a series of consultations with water sector stakeholders, and work carried out by an Ofwat-chaired sector working group comprising incumbents, NAVs and developers. It is issued under the [Charging Rules for New Connection Services \(English Undertakers\)](#) (**ENCR**).

The EICF sets out the high-level principles and processes for all water companies and developers to follow with respect to environmental incentives. It provides developers with some commonality as to incentives across water companies, while allowing water companies to retain flexibility and ownership of their charges and environmental incentives. It requires all companies to offer environmental incentive payments to developers who meet the qualifying criteria.

Environmental incentive payments are intended to encourage developers to build more water efficient properties. These payments are an important lever in addressing water scarcity, as they aim to embed water efficient design within a household or building before it goes to market. This means that, on the demand-side, reduced water consumption is not contingent on consumer behavioural change alone.

The water scarcity challenges faced within England are immense.¹ In June 2025 the Environment Agency (EA) published its [National Framework for Water Resources](#), warning that England's public water supply could be short by 5 billion litres a day by 2055 without urgent action to futureproof resources. There is already huge pressure on the nation's water resources, and due to population growth and climate change, that pressure is set to continue and steadily increase – causing significant consequences for economic growth, food production and the environment. Ofwat is therefore focused on tools like the EICF, and ways in which they can be improved to better support water efficiency objectives.

¹ Wales faces slightly different challenges, with wetter winters and drier summers putting pressure on water supply. These challenges are less relevant to this consultation, which concerns rules applied to English companies only.

Prior to the introduction of the ECIF, several water companies offered incentives to their developers. These incentives varied in their level of ambition, structure, and qualifying criteria. We concluded this inconsistency could inhibit uptake, as developers faced different standards depending on what area their development was located in.

The EICF addresses these issues by establishing a standard, best practice approach to the design and delivery of environmental incentive payments. This simplifies the process for developers and establishes a consistent signal to include water efficient measures in developments.

2.2 Approach to setting environmental incentives under the EICF

The EICF uses a 'fittings approach' to determining water efficiency. All water companies must offer at least one environmental incentive for water efficiency, using the methodology set out in table 1 of the EICF (reproduced below in table 2). The methodology sets a maximum consumption for each type of fitting installed by the developer, equal to or more ambitious than the standards in Part G of the Building Regulations 2010. Water companies may offer incentives based on more ambitious maximum consumption levels, and they may also offer bespoke incentives for water efficiency or sustainable drainage that use a different methodology to those reproduced in table 2.

Table 2: Water efficiency methodology in the EICF

Building Regulations, Part G, Table 2.2		Common Environmental Incentive
Water fittings	Maximum consumption (110 l/p/d)	Maximum consumption (equal to or less than the following values)
WC	4 / 2.6 litres dual flush	≤ 4 / 2.6 litres dual flush
Shower	8 l/min	≤ 7 l/min
Bath	170 litres	≤ 170 litres
Basin taps	5 l/min	≤ 5 l/min
Sink taps	6 l/min	≤ 6 l/min
Dishwasher	1.25 l/place setting	≤ 1.0 l/place setting
Washing machine	8.17 l/kilogram	≤ 6 l/kilogram

The EICF is therefore focussed on the outcome – reduced water consumption, as measured by maximum flow rates or volume, and does not specify whether or not this can be achieved through use of flow limiting devices.

2.3 Feedback on the EICF and further work

The take-up of incentives by developers has varied widely in the first year of the EICF across water companies, NAVs and developers. It is important that water companies, including NAVs, work to increase developers' awareness of the incentives on offer to increase take-up. The [Let's Save Water](#) campaign and other wider initiatives will also help to demonstrate the importance of saving water.

In this consultation we address a specific issue raised with us by members of the Water UK New Connections Network: how flow limiters should be treated under the EICF. We are proposing an amendment to the EICF to address this point, to provide further clarification and improve consistency in how the EICF is implemented.

We have received other feedback on the operation of the EICF. This included an issue regarding baths, raised by the Water UK New Connections Network, which we addressed in an amendment to the EICF in December 2025.

We have also received feedback from stakeholders concerning differences in the ways companies handle applications, payments and other procedural matters.

Alongside this feedback, there is also work carried out by the Enabling Water Smart Communities ([EWSC](#)) project on standardising incentives offered by water companies, which complements the EICF.²

There is also relevant work by the UK government, including its response to the 2025 consultation on reviewing the water efficiency standards in the Building Regulations,³ and the introduction of the Regulations of the Mandatory Water Efficient Labelling Scheme (MWELS) to parliament later this year. Furthermore, the [Water Smart Growth Board](#), which builds on the work of the EWSC, will be working on a range of initiatives to tackle water scarcity, infrastructure capacity challenges and climate-related pressures. This work includes improving water efficiency through implementation of changes to Part G of the Building Regulations.

² See EWSC [Environmental Incentives: Standardisation across the water sector to deliver water smart housing — EWSC](#).

³ See Defra [Review of Water Efficiency Standards in the Building Regulations 2010 – Defra – Citizen Space](#).

These initiatives are likely to contribute to improving the take-up of environmental incentives by developers and the operation of the EICF. Therefore, we consider it appropriate to give the EICF additional time to embed before we consider these issues in greater detail.

3. The role of flow limiters in promoting water efficiency

This section defines flow limiters and discusses the role they can play in reducing water use in households and businesses. We discuss their effectiveness and explore some of the concerns raised about their use as a means of reducing water flow and qualifying for environmental incentive payments. We are grateful to those sector experts in the manufacturing and use of flow limiters with whom we spoke for their advice.

3.1 Types of flow limiters

Various types of devices can reduce the flow of water through pipes, taps or showerheads. Terminology for these devices is often used interchangeably, so defining the terms in the EICF will improve clarity. In this document we use the collective term 'flow limiters' to refer to the following types of device:

- **Flow regulator** – a device that adjusts the flow of water through a pipe or tap or showerhead to a set rate (with some possible slight variation either side of the rate due to site factors). The flow rate is maintained even as water pressure is increased. These can be 'integrated', i.e. included in fittings during manufacture (for example, a flow regulator embedded in a showerhead), 'retrofitted', i.e. included in-home, after manufacture (for example, a flow regulator screwed in between the shower hose and the showerhead), or included 'in-line', i.e. in the piping (for example, a flow regulator installed under the meter or in the pipes under the kitchen sink).
- **Flow restrictor** – a device that physically limits how much water can pass through the pipe, tap or showerhead. This will reduce the flow of water at a given rate of pressure. If the pressure is increased, the flow will also increase. As with flow regulators, these can be integrated, retrofitted, or in-line.
- **Aerator** – a device that adds air to the water stream, giving the stream a 'fuller' feeling for the user. For this reason, aerators are often connected to a restrictor or a regulator, to compensate for the reduced flow and improve the user experience. As with a flow restrictor, an aerator can reduce the flow of water through a tap at a given rate of pressure.

Q1	Have we identified and accurately characterised the types of flow limiters in the market? Do you agree we should include definitions in the EICF?
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3.2 Flow limiters under the EICF – status quo and company practice

The EICF does not currently state whether developers can use flow limiters to help meet maximum consumption rates, thereby qualifying for environmental incentive payments. This has resulted in some companies allowing their use while other companies do not. Although we have not heard directly from developers at this stage, this difference in approach appears to undermine the common rules and experience that the EICF is intended to promote across environmental incentive offerings.

We have contacted water companies directly and via the Water UK New Connections Network for more information about their approach to the use of flow limiters. We have also reviewed companies' charging arrangements and other published material. We are grateful to those companies with whom we have engaged for their help.

Four water companies currently reference flow limiters (by another name) in their published material. However, the type of flow-limiting device being referred to is often unclear, and there is no consistent industry approach to whether flow limiters can be used to qualify for environmental incentive payments.

There are several reasons why companies may be reluctant to allow developers to use certain types of flow limiters to help them qualify for incentive payments. We explain these reasons and offer initial views on them in section 3.4.

Q2	What approach does your company take to flow limiters under the EICF? What is this approach informed by?
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3.3 Regulatory framework relating to flow limiters

There are two key pieces of regulation relating to the installation and operation of flow limiters.

Regulation 36 of the Building Regulations 2010

Regulation 36 sets a maximum water consumption standard for new dwellings and a tighter optional standard that councils may choose to enforce. The standard is based on a litres of water per person per day measure. To demonstrate compliance with these standards, developers can either use a water efficiency calculator, or a simpler fittings-based approach, where each fitting must meet a prescribed standard based on flow rate or volume.

The methodology in the EICF aligns with the fittings-based approach, but the standards required by the EICF are more ambitious, requiring performance over and above the legally required level. Both the EICF and the Building Regulations have no reference to flow limiters.

UK Government proposed to tighten the water efficiency standards in the Building Regulations in a September 2025 consultation.⁴ The conclusions have not yet been publicly released, but should Defra decide to tighten standards, we will review the standards in table 1 of the EICF and consider whether they should be more ambitious. We would carry out any such review of the EICF in 2027 at the earliest.

Regulation 4 of the Water Supply (Water Fittings) Regulations 1999

Regulation 4 sets out requirements to ensure water fittings are safe for use. It also sets out standards that must be conformed with when water fittings are modified or altered. It requires that flow limiters are included in water fittings in an appropriate manner, set out in Regulation 4 as:

- Conforming to an appropriate British Standard or some other national specification which provides an equivalent level of protection and performance; or
- Conforming to a specification approved by the regulator; or
- In the case of modifications – a method of installation approved by the water undertaker.

3.4 Effectiveness of flow limiters

Flow regulators and flow restrictors are both capable of reducing the flow of water, although regulators are more effective at maintaining a specified flow rate when pressure changes. Flow restrictors are more relevant at sites where water pressure is stable, to achieve a stable reduction in flow.

In the following sub-sections, we set out the concerns that have motivated some companies to prevent developers from using certain flow limiters to qualify for environmental incentives.

⁴ See Defra [Review of Water Efficiency Standards in the Building Regulations 2010 – Defra – Citizen Space](#).

3.4.1 Installing flow limiters

Incorrect installation or failure to install is a potential risk with retrofitted flow limiters. This could result in expected water efficiency gains not materialising in a development or being significantly reduced.

We have heard concerns that this might occur during development due to gaps in communication or misunderstandings between developers and plumbers. The risk of this taking place is reduced with an integrated flow-limiter, because the flow limiter is already embedded in the fitting when provided to the plumber.

We have also heard concerns that some retrofit flow limiters may not be compatible with certain fittings. This could result in expected water efficiency gains not materialising, either due to the fixture no longer working and requiring replacement, or because the flow is not effectively limited.

3.4.2 Auditing flow limiters

The installation issues noted in section 3.4.1 highlight why auditing environmental incentive applicants is important. An audit may reveal systemic failings during the installation process, for example flow limiters being incorrectly retrofitted or different fixtures with integrated flow limiters being installed compared with the design specifications.

In both these examples, the intended water efficiency standards would not have been met, with the potential to undermine the environmental incentives framework, unless remedied by the developer.

A physical audit of the flow rate coming out of a particular fitting may be required identify any installation issues, and ensure that the intended flow rate has been achieved. However, we understand some water companies are not conducting physical tests as part of their environmental incentive compliance audits. Instead, they rely on the flow rates in the technical specifications stated by the manufacturer for a particular fitting and conduct an audit to establish only that the fitting specified in the design is the same as the one that has been installed.

These companies have said that they are unable to rely on the flow rating specified by a retrofitted flow limiter, as it could behave differently depending on the other fittings used, and in some cases the flow rate might not even be specified. As a result of this evidentiary approach, they are unable to accept applications for environmental incentive payments in relation to retrofit flow limiters.

3.4.3 Behavioural response

We have also heard concerns that flow limiters might be removed by occupants. Where removal occurs, the reason for the environmental incentive payment being provided to the developer is undermined, as the water efficiency gains it was intended to reward no longer exist.

Although we have encountered much discussion about this possible risk, the evidence for such behaviours appears to be limited. One study focusing on energy and water savings from replacing existing fittings with flow regulated alternatives in a sample of Swiss households observed that 12% of surveyed participants removed flow regulated taps after installation, and around 30% of respondents removed flow regulated showerheads.⁵ From our discussions with one water company, customer removal rates of water efficiency devices appears to be low, and focused on removing showerheads rather than tap inserts.

Actual removal rates in practice are likely affected by a number of factors, including:

- Whether or not the occupier is aware that a fitting contains a flow limiter.
- The user experience of reduced flow, which may be more noticeable when showering, rather than washing hands or filling a kettle.
- Difficulty of removal, which is dependent on how visible and accessible the flow limiter is to the user, and whether they require specialist tools or skills to remove it.
- Impact of removal. The removal of integrated flow limiters may result in a spluttering or inconsistent flow. This may prompt reinstatement of the device, although if that is not possible it may prompt installation of an alternative unregulated or restricted fitting. Removing retrofitted flow limiters may have less impact.

Occupiers may also adjust their water consumption in response to the installation of flow restrictors in taps and showerheads. For instance, they may increase the duration or frequency of water usage (for example, longer showers), which would partially offset the stated efficiency gains of flow limiters. However, one study concluded that this behaviour was not large enough to offset the water savings of flow restrictors.⁶ Future smart metering will also help to ascertain the extent of compensatory consumption,

⁵ Cabrera, Njem, Bertholet, Patel, '[Simple solutions first—energy savings for domestic hot water through flow restrictors](#)', March 2023.

⁶ Ableitner, Schöb, Tiefenbeck, '[Quantifying the Potential of Voluntary Energy Efficiency Measures: The Case of Flow Restrictors](#)', 2016.

and educational campaigns, like Ofwat's current Let's Save Water campaign, will help mitigate these effects.

Q3	Have we correctly captured the concerns about flow limiters? Are there other issues we should be aware of?
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3.5 Implications for flow limiters under the EICF

We have carefully considered the points raised by stakeholders. We respond to each of them below, in setting out our current view on how flow limiters should be considered under the EICF. Our view is that flow limiters (as defined above at 3.1) can be effective in contributing to water efficiency in new developments, and developers should not be prevented from deploying them. Our reasoning is as follows:

- Flow limiters are already a well-established tool for reducing water use in households and businesses and are being installed in homes as part of the household water efficiency programmes of various water companies.
- There are numerous flow limiting products on the market already, giving developers choice to determine for themselves what the most optimal product is for their development.
- There is innovation taking place in the market, and as a result we expect these products will only improve in their effectiveness and usability. These improved products may achieve the same or higher levels of effectiveness, with less compromise on user experience.
- Flow limiters will become increasingly necessary going forward, as water efficiency standards become increasingly stringent and the sector becomes more ambitious in order to address increasing water scarcity concerns.
- We have not seen sufficient evidence (either anecdotal or based on surveys of occupants of flow-limited developments) to suggest that all or some types of flow limiters are at significant risk of being removed by occupants.
- We consider that even if some occupants remove flow limiters, the overall water efficiency gains made by their inclusion across a whole development more than offset these few removals.
- We consider that any concerns about installation or auditing of flow limiters can be addressed through sensible changes to the administration of environmental incentive payments, rather than through a complete rejection of the use of flow limiters by developers. For example, we think it is reasonable to expect a water company to conduct a physical test using a weir cap to ascertain flow, if this cannot be determined based on the fittings used alone.

This reasoning informs our preference for option 2, outlined in section 4.

4. Options for flow limiters under the EICF

In this section we set out four options for clarifying the position of flow regulators under the EICF. Based on the reasons stated above at 3.5, our preferred option is option 2. However, we seek stakeholders' views on each of these options and welcome any evidence that relates to the concerns outlined in the previous section.

Table 2: Consultation options for amending the EICF

Option 1	Companies can decide their own approach towards flow limiters when determining their environmental incentive qualifying criteria.
Option 2	Allow all flow limiters to be used to help qualify for environmental incentive payments.
Option 3	Allow all flow limiters to be used to help qualify for environmental incentive payments except for flow limiters retrofitted to showers .
Option 4	Allow only integrated flow limiters to be used to help qualify for environmental incentive payments.

Our aim is to amend the EICF for whichever option we decide to take forward; we do not consider leaving the EICF unamended to be a valid approach, given the concerns raised with us that this creates uncertainty among developers. As a result, we consider it would be necessary with each option to define in the EICF what we mean by flow limiters. We have set out a proposed definitional structure at section 3.1 and in box 1 below, and we seek feedback on this.

Option 1. Companies can decide their own approach towards flow limiters

Option 1 retains the status quo, wherein companies are able to decide the approach they take to determining whether different types of flow limiters can be used by developers to help them qualify for environmental incentive payments. Companies would retain their current freedom to stipulate what they consider to be an appropriate means of achieving water efficiency – they can choose whether these devices are counted towards efficiency gains, and in what form or location in the property (integrated in taps or showerheads, or retrofitted onto taps or showerheads).

Under this option, companies have the flexibility to change their approach based on evidence they might obtain about customer removal (for example) as the EICF further embeds. Similarly, companies may re-visit their positions if technologies improve and make flow limiters more effective, such that they outweigh the risk of removal from the company's perspective, or address any concerns about poor installation, for example.

Companies may also choose to take different approaches to allowing flow-reducing devices depending on the tier of incentive they are offering.

Although it creates flexibility for companies, this option does not promote a standardised approach across the industry. This may cause some frustration for developers who are undertaking developments across sites with different water companies, or developers who feel they would be treated more favourably if their site was in a different location.

Furthermore, our current view of the evidence is that flow-reducing devices would on balance result in more water savings if they were allowed to be used by developers to qualify for environmental incentives – even if some small proportion might be removed by occupants, or poorly installed such that the gains are not realised.

Therefore, while acknowledging the merits of this option in terms of autonomy for companies to own their approaches, we believe it is more important to support a consistent approach and to promote greater water efficiency. We do not prefer option 1.

Option 2. Allow all flow limiters

Option 2 is our preferred option. We consider that option 2 better prioritises water-efficiency objectives and promotes consistency across all companies, which is what the EICF is designed to encourage. It would require that companies allow developers to use flow limiters to help meet the flow rates necessary for them to qualify for environmental incentive payments. This would provide more flexibility to developers, allowing them to choose the means by which they reduce flow rates in their developments. Leaving this choice to developers also allows the market to respond and develop new and improved flow limiters which may more effectively meet water efficiency standards.

We do not consider that the evidence of occupant removal or compensatory behaviour is sufficiently concerning to suggest that flow limiters should not be relied upon for reductions in water efficiency. If a small number of occupants in a new development have them removed at some point after their occupancy, this is unlikely to outweigh the water efficiency benefits of the majority remaining in every other property in a development.

Based on some feedback we have received, companies may also have to adopt physical auditing practices to be able to test retrofitted flow limiters. Physical audits can help to deter non-compliance. We expect companies to take a more intensive approach to auditing and deterrence in the early years of the incentive scheme, to build trust between developers and companies that incentives are deserved. As discussed at section 3.5, we do not consider requiring physical audits would be overly onerous.

As this is our preferred option at present, we have included draft text in box 1 to illustrate how we would implement this option the EICF. We seek your feedback on how effectively this text captures the meaning of option 2.

Box 1. Illustrating how option 2 could be given effect to under the EICF

Include the following definition in alphabetical order under the heading 'Interpretation':

"Flow Limiters" are flow regulators, flow restrictors or aerators which reduce the flow of water through a pipe or fitting, whether installed in-line, integrated into a water fitting, or retrofitted onto a water fitting.

Include the following bullet point beneath the first bullet point under the heading 'Methodology for determining environmental incentives'.

- Water Companies must allow Developer Customers to use Flow Limiters in order to help them achieve the levels of efficiency set out in Table 1.

Option 3. Allow all flow limiters except for flow limiters retrofitted to showers

Under this option, developers would be able to use all flow limiters to help qualify for environmental incentive payments, except for flow limiters that are retrofitted to reduce the flow from a shower.

We include this option as it targets more specifically the concern about removal of flow limiters by occupants in response to a negative experience of reduced flow. This is more likely to be true for showers, as the flow rate can impact more heavily on user experience of a shower compared to a kitchen tap for example.

However, showers use a significant proportion of water in the household, and preventing developers from using retrofitted flow limiters could send the wrong message about water efficiency, without strong evidence to support such concerns. For this reason, while this option does more closely target the root of concerns about occupant removal, we do not support it.

Option 4. Allow only integrated flow limiters

This option would allow developers to use integrated flow limiters only to help achieve compliance with water efficiency standards and qualify for environmental incentive payments. They would be unable to use retrofitted flow limiters when assessing whether a developer qualifies for environmental incentives.

We include this option to address concerns expressed by some water companies that the water efficiency gains from retrofitted flow limiters are unreliable, because they may be more easily removed by a future occupant, or because the retrofit may be poorly installed or incompatible with other fixtures, thus undermining the claimed efficiency benefits. In contrast, integrated flow limiters are more difficult to remove, more costly to replace (a whole new fitting may be needed) and less likely to be missed in the installation process.

We are aware that some companies already take the approach set out in this option. We understand this is due to their specific concerns with the removal of retrofit flow limiters, as well as other concerns about the likelihood of mis-installation of retrofit flow limiters, and the need to physically audit retrofits. We consider that physical audits of environmental incentive applicant sites would not be unduly onerous, and would identify any issues with mis-installation.

We have not seen clear evidence of occupant removals. We consider that, even if a small percentage of flow-limiters in a development are eventually removed, the water efficiency gains made by the large majority remaining in place are significant and should not be compromised because of concerns about a few. We also consider that flow limiters are a cost-effective way to reduce water flow, and with any future tightening of standards may become essential to achieving meaningful reductions.

For these reasons we do not support option 4.

Q4	What are your views on our preferred option (option 2) and the other options we have set out to provide guidance in the EICF on the use of flow limiters? Are there other options that you would prefer?
Q5	What are your views on the draft text illustrating how option 2 could be included in the EICF, set out in Box 1. Does it achieve the intended effect of option 2?

5. Next steps

The closing date for this consultation is 9 September 2026. Please email us at charging@ofwat.gov.uk with your response, or if you wish to discuss any aspect of this consultation, or to arrange a conversation on the issues we have raised.

We will consider all responses carefully. If appropriate, we will prepare revisions to the EICF and we may consult again if appropriate.

**Ofwat (The Water Services Regulation Authority)
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