



**Ref:** EA  
**Date:** 18 August 2021

Dear All,

## **Dealing with the Bathing Water classification gap from 2020**

### **Introduction**

The COVID-19 pandemic and associated lockdown in spring 2020 prevented the Environment Agency from being able to take the bathing water samples needed to make a compliant classification in 2020. Following the lifting of lockdown restrictions, a limited programme of sampling resumed, but for most bathing waters, three or less samples were taken during the second half of the season.

In consultation with the Environment Agency, Minister Pow took the decision not to produce a classification for 2020.

Since a bathing water classification requires and uses up to a 4-year rolling dataset, the 2020 data gap needs to be taken into consideration for future classifications until 2023.

### **2020 sampling**

Government restrictions meant no bathing water sampling was carried out between May and mid-July. When the lifting of restrictions meant sampling could resume, it was not possible to collect samples from 32 bathing waters as safe social distancing could not be maintained. For most of the remaining sites, only one sample was taken per month; July, August and September, and some of these were missed (three or less samples). At 46 bathing waters that were identified as priority waters, weekly sampling was programmed, but this was not possible to achieve at all sites.

This means that samples taken in 2020 only cover the latter half of the bathing water season and don't include a pre-season sample. At all but a few sites, very few samples were taken at all.

### **Considerations**

Since bathing water classifications use data from the current year and the three previous bathing seasons, a decision is needed on how to handle the data gap from 2020, for this year and future classifications. The Bathing Water Regulations 2013 do not provide a solution to this issue, yet a decision is needed to take account of the exceptional circumstances from 2020 to provide classifications for bathing waters in 2021, 2022 and 2023.

There is a strong seasonal influence on bathing water quality – it is typically best early in the season and worse later on due to the weather, particularly rainfall. Were the 2020 samples used in any future classification, these would introduce a seasonal bias since the whole season would not be represented, and because the 2020 data set only includes a few samples for the vast majority of bathing waters, we would also expect an element of random change to be introduced to the dataset without justification. **For this reason, the Environment Agency**

The Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

**does not feel it is appropriate to include any of the 2020 samples in future classifications**

**Proposed way forward**

The Environment Agency proposes to use the most recent four years with sample data from the previous five seasons to make future classifications and exclude the 2020 data. This ensures that all bathing waters will contain the minimum 16 samples usually needed to make a compliant classification.

This would mean the 2021 bathing water classification would use data from 2017, 2018, 2019 and 2021. Future classifications would use this convention until 2023. After this period classifications would revert to normal using the most recent four classifications as specified in the Regulations.

This is our preferred way forward, but if you are aware of any issues or complications that this will cause, please let us know and we will consider before we make our final decision.

Please let Jonathan Ponting ([Jonathan.ponting@environment-agency.gov.uk](mailto:Jonathan.ponting@environment-agency.gov.uk)) have any comments by 1 September 2021.

Yours sincerely

A black rectangular redaction box covering the signature of Helen Wakeham.

**Helen Wakeham**  
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