

From: [REDACTED]
To: [REDACTED]
Subject: FW: Loch Leven phosphorus pollution
Date: 31 March 2023 10:24:37

From: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>
Sent: 15 November 2022 10:39
To: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: FW: Loch Leven phosphorus pollution

[REDACTED],

Thank you for your email asking for information about Loch Leven.

In order to reply to this, you may want to contact SEPA for their input, as they may be best to comment on any concerns about Loch Leven. This also may be a matter of local planning.

Kinross Action Group is a local group which appears to have been set up recently to object to plans for a housing development in the area, although they may have been active a while ago in relation to other development in the area. I understand that in the past there was a different stakeholder group active historically related to Loch Leven environmental quality and this included engagement with SEPA, NatureScot, Scottish Water and people local to the area.

There has been longstanding local community concern linked to water quality at Loch Leven in Kinross-shire, reflecting the loch's ecological importance and its amenity value, but also its susceptibility to eutrophication which is the over-enrichment of certain nutrients which can result in algal blooms. Scottish Water and its predecessors worked actively with stakeholders in the past to deliver improvement, with particular focus on limiting the level of phosphorous in the final effluent from the WWTWs that serve the communities of Kinross and Milnathort.

In recent years, stakeholders report that there has been an increase in blooms of toxic blue-green algae, which campaigners fear reflect deterioration in water quality. It was reported in the local paper in February 2022 that the UK Centre for Ecology & Hydrology was investigating a rise in phosphorous levels and this mentioned investigating the influences of waste water, agricultural run-off and climate change – see [Scientists link human sewage and toxic algae in Loch Leven \(thecourier.co.uk\)](#).

We are arranging a meeting with local stakeholders to discuss their concerns further.

There is reasonable biological treatment capacity at Kinross WWTW and neither it nor Milnathort are currently prioritised for investment. This partly reflects the outcome of a 2012 Water Quality Impact Assessment Report which concluded that the worst case was that the two public WWTWs then contributed between 11.7% and 14.1% of the Total Phosphorus loading to the loch, which was expected to reduce to between 9.8% and 12.8% following improvement work at Kinross South pumping station. At the time, this suggested that greater benefit would be achieved by focusing effort on larger sources of phosphorous.

To complicate matters, on 8th September 2022, during an intense rainstorm which also caused extensive flooding in parts of Perth (which saw the typical rainfall for the full month fall in 2-3

hours), there was a licensed spill from the Combined Sewer Overflow at Kinross WWTW. This was exacerbated as storm debris blocked a culvert beneath the popular footpath around Loch Leven, causing water to flow over the footpath. Following a report to SEPA, a member of the Waste Water Operations team attended and cleared the screens at the entrance to the culvert, restoring normal flow. The spill on 8th September has since been the subject of outspoken criticism and correspondence to Minister, led by a local Lib Dem councillor Willie Robertson and Scottish Lib Dem Leader Alex Cole-Hamilton, who raised it prominently in the recent debate in the Scottish Parliament. The issue was also raised with SEPA by Liam Kerr MSP at an Net Zero Energy and Transport committee meeting.

We have explained in response to enquiries that combined sewer systems like the one that serves Kinross receive both waste water from local homes and businesses; and surface water from the older parts of the community and its road network. The WWTW is designed so that very high flows in storm conditions can be returned to the environment once storm tanks are at full capacity, rather than causing flooding at the WWTWs or within communities.

Our Waste Water Treatment Works at Kinross and Milnathort are checked regularly to ensure they are operating to a high standard and that effective measures are in place to screen any storm overflows and minimise their impact on the local environment.

As mentioned above, it may be best to get SEPA's view of the environmental water quality of Loch Leven so that you have a broader picture of all the possible influences which may be impacting on Loch Leven. We will continue to work with SEPA and other stakeholders to be guided by evidence.

I hope this has provided you with some background information.

Kind regards

A solid black rectangular redaction box covering the signature area.

From: [REDACTED]
To: [REDACTED]
Cc: [Public Affairs](#); [REDACTED]
Subject: RE: PQs - Deadline Date 1st March
Date: 03 March 2023 19:27:11
Attachments: [IUW Dashboard - Progress Tracker.xlsx](#)

Hi [REDACTED]

We've had a change in staff at SW with [REDACTED] in my team moving on.

The latest update on the routemap we have is attached. We'll get into a more regular reporting cycle over the next 2 months.

[REDACTED]

SW Internal
Personal

From: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Sent: 01 March 2023 13:19
To: Public Affairs <Public.Affairs@scottishwater.co.uk>
Cc: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>
Subject: RE: PQs - Deadline Date 1st March

Thanks all!

[REDACTED], I don't think I've received a recent update on the routemap, did SW produce one in January or February?

Thanks,

[REDACTED]
Policy Officer
Water Industry Team
Scottish Government
Office: [REDACTED]
Mobile: [REDACTED]

From: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)> **On Behalf Of** Public Affairs
Sent: 28 February 2023 16:23
To: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: FW: PQs - Deadline Date 1st March

Hi [REDACTED],

Note back from [REDACTED] below...

SW Private
Personal

From: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>
Sent: 28 February 2023 16:02
To: Public Affairs <Public.Affairs@scottishwater.co.uk>
Cc: [REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Subject: RE: PQs - Deadline Date 1st March

Hi.

[REDACTED] is spot on.

I don't actually know if the website listing has been updated. I'll need to check.

[REDACTED]

SW Private
Personal

From: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)> **On Behalf Of** Public Affairs
Sent: 28 February 2023 14:47
To: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>
Cc: [REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Subject: FW: PQs - Deadline Date 1st March
Importance: High

Hi [REDACTED],

[REDACTED] is hoping to double check the numbers – see below – could you help clarify?

SW Private
Personal

From: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Sent: 28 February 2023 14:24
To: Public Affairs <Public.Affairs@scottishwater.co.uk>
Cc: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: RE: PQs - Deadline Date 1st March

Thanks [REDACTED].

Can I just double check the numbers in 15157?

I think the latest update from [REDACTED] had revised the high priority CSOs to 104, with 24 overflows affecting water quality, and 39 WwTW to be improved. If so, perhaps we can amend :

Scottish Water publishes an annual update to its Urban Waters Route Map and the most recent update from December 2022 is available on its website at [Annual Update – Urban Waters Route Map – December 2022](#). In its December 2022 update, Scottish Water confirmed that 54 projects have been initiated to develop solutions and support delivery of all high priority discharges by 2027. Following discussions with SEPA, some initially identified needs have been removed/downgraded. Scottish Water intends to target investment towards 104 high priority CSO discharges (detailed on its website at [Future needs list Dec 21](#)); this includes 24 storm overflows which have been assessed as potentially impacting water quality. Scottish Water has also initiated projects and is scrutinising options to enable improvement works to be delivered at 39 identified waste water treatment works.

Scottish Water’s capital investment projects involve a significant period of development work, including identifying options, determining costs and completing all land, planning and permitting activities in advance of delivering any scheme on site. The projects identified in the routemap will develop over the next two years, in line with Scottish Water’s capital investment process, to the point where clear timescales for improvements can be agreed. It is anticipated that the majority of improvements will be in place closer to the 2027 target timeframe, but Scottish Water will review all opportunities to deliver improvements in the shortest possible timeframe, where possible. Scottish Water will continue to provide annual updates on its website to outline progress being made in delivering commitments under its Improving Urban Waters Route Map.

Does that sound ok? I don’t know whether the website was already updated to change the 108 UIDs to 104.

Thanks,

██████████

Policy Officer

Water Industry Team

Scottish Government

Office: ██████████

Mobile: ██████████

From: ██████████ [@SCOTTISHWATER.CO.UK](mailto:██████████@SCOTTISHWATER.CO.UK) > **On Behalf Of** Public Affairs

Sent: 28 February 2023 13:01

To: ██████████ [@gov.scot](mailto:██████████@gov.scot) >

Cc: ██████████ [@gov.scot](mailto:██████████@gov.scot) >

Subject: FW: PQs - Deadline Date 1st March

Importance: High

Hi ██████████,

Here is some information about the CSO PQs.

We're just finalising the net zero/woodland/peatland information for you and will get that to you this afternoon.

S6W-15157 Alex Cole-Hamilton: To ask the Scottish Government, further to the response to the members' business debate on motion S6M-06148 (Sewage and Scotland's Waters) by the Minister for Environment and Land Reform on 26 October 2022 (*Official Report*, c. 124), how many of the (a) 40 waste water treatment works and (b) 26 priority storm overflows, which the Minister stated would be improved over the next six years, have since undergone improvement works.

Scottish Water publishes an annual update to its Urban Water's Route Map and the most recent update from December 2022 is available on their website at [Annual Update – Urban Waters Route Map – December 2022](#). Scottish Water's capital investment projects involve a significant period of development work, including identifying options, determining costs and completing all land, planning and permitting activities in advance of delivering any scheme on site. In its December 2022 update, Scottish Water confirmed that 54 projects have been initiated to develop solutions and support delivery of all 108 high priority discharges by 2027. These 108 high priority CSO discharges are detailed on Scottish Water's website at [Future needs list Dec 21](#) and include the 26 storm overflows which have been assessed as potentially impacting water quality. Scottish Water has also initiated projects and are scrutinising options to enable improvement works to be delivered at the 40 identified waste water treatment works. All of these projects will develop over the next two years, in line with Scottish Water's capital investment process, to the point where clear timescales for improvements can be agreed. It is anticipated that the majority of improvements will be in place closer to the 2027 target timeframe, but Scottish Water will review all opportunities to deliver improvements in the shortest possible timeframe, where possible. Scottish Water will continue to provide annual updates on its website to outline progress being made in delivering commitments under its Improving Urban Waters Route Map.

S6W-15158 Alex Cole-Hamilton: To ask the Scottish Government how many of the approximately 1,000 network and treatment works combined sewer overflows (CSOs) which, according to Scottish Water's *Improving Urban Waters* route map, are "discharging to the highest priority waters (including all designated shellfish and bathing waters)", have had monitoring installed on them, and whether it will provide a list of these CSOs.

Scottish Water publishes an annual update to its Urban Water's Route Map and the most recent update from December 2022 is available on their website at [Annual Update – Urban Waters Route Map – December 2022](#). In this update, Scottish Water has confirmed that priority locations have been identified for the 1,000 spill monitors, with installation programmed over 2023 and 2024. Over the past year, Scottish Water has invested significant time in developing a prioritisation approach for monitoring locations, based on amenity levels and predicted spill frequencies, and agreeing this with SEPA. This has been published on Scottish Water's website at: [Methodology to prioritise CSO locations](#). Scottish Water has also made considerable effort to review the marketplace to determine the most appropriate monitors to deliver maximum value

for customers. A priority list of locations will soon be available on Scottish Water's website and Scottish Water has committed to providing an annual update on its website to outline progress being made in delivering commitments under its Improving Urban Waters Route Map.

S6W-15159 Alex Cole-Hamilton: To ask the Scottish Government whether spill data on monitored combined sewer overflows (CSOs), where data is currently reported to SEPA, will be published annually, in light of the commitment in Scottish Water's *Improving Urban Waters* route map that annual publication of this data would commence by December 2022.

In its 'Improving Urban Waters update' published in December 2022 ([here](#)), Scottish Water confirmed that overflow spill data reported under licence has been published on their website with supporting narrative. The information reported in January 2022 and a summary covering data between 2017 and 2021 can be found [here](#). Spill data reported to SEPA in January 2023 will be published alongside an updated summary (2018 – 2023) on Scottish Water's website by the end of March 2023.

S6W-15160 Alex Cole-Hamilton: To ask the Scottish Government when the last inspection of each of the 345 SEPA-licensed and regulated sewer networks in Scotland was carried out; whether any were found not to be compliant with their licence conditions at their last inspection, and, if so, (a) for what reason, (b) whether any work was carried out on them and (c) whether it will provide a list of any non-compliant networks.

This query should be addressed to SEPA.

SW Private
Personal

From: [REDACTED] On Behalf Of Public Affairs
Sent: 20 February 2023 12:01
To: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: RE: PQs - Deadline Date 1st March

Hi [REDACTED],

An email to confirm received.

We'll speak to colleagues and get some information to you as soon as possible.

Kind regards

[REDACTED]

[REDACTED]

[REDACTED]
Scottish Water

Tel: [REDACTED]

Working days: [REDACTED]

SW Private
Personal

From: [REDACTED] <[REDACTED]@gov.scot>

Sent: 20 February 2023 09:52

To: Public Affairs <Public.Affairs@scottishwater.co.uk>

Subject: FW: PQs - Deadline Date 1st March

****EXTERNAL MAIL**** - Think Before You Click

Morning all,

Another batch of PQs this week.

I intend to provide a link to SW's website for 15159, and our colleagues will get the answer for 15160 from SEPA. Are you able to offer any narrative for the other 2 questions?

[S6W-15157](#) Alex Cole-Hamilton: To ask the Scottish Government, further to the response to the members' business debate on motion S6M-06148 (Sewage and Scotland's Waters) by the Minister for Environment and Land Reform on 26 October 2022 (*Official Report*, c. 124), how many of the (a) 40 waste water treatment works and (b) 26 priority storm overflows, which the Minister stated would be improved over the next six years, have since undergone improvement works.

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[S6W-15160](#) Alex Cole-Hamilton: To ask the Scottish Government when the last inspection of each of the 345 SEPA-licensed and regulated sewer networks in Scotland was carried out; whether any were found not to be compliant with their licence conditions at their last inspection, and, if so, (a) for what reason, (b) whether any work was carried out on them and (c) whether it will provide a list of

any non-compliant networks.

I'd be grateful for a contribution by 1 March.

I also forgot to send this one last week - To ask the Scottish Government what progress Scottish Water is making with (a) woodland creation, (b) woodland management and (c) peatland restoration on its land, as part of its Net Zero Emissions Routemap.

Are you able to provide any lines or would it be sufficient to point the MSP to the website? Grateful for a response on this one by 28 Feb.

Thanks,

[Redacted Name]

Policy Officer
Water Industry Team
Scottish Government
Office: [Redacted]
Mobile: [Redacted]

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Scottish Water

www.scottishwater.co.uk

From: [REDACTED]
To: [REDACTED]
Subject: FW: Pharmaceutical pollution session
Date: 28 March 2023 07:58:37

[REDACTED] | Water Policy and DECC Operations Division |
Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]@SCOTTISHWATER.CO.UK>
Sent: 15 February 2022 13:23
To: [REDACTED]@gov.scot>
Cc: [REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>

Subject: FW: Pharmaceutical pollution session

Hi [REDACTED],

I'm happy to support any discussion with CAS on why we have developed the IUW. I'd imagine giving a similar overview (where we are, how do we compare, what are we proposing) that I gave to the River Almond WQ group if you think that might work? [REDACTED] will be able to give the pharmaceutical pollution background too.

Specific points we'd have to make are:

- We know from the Chemical Investigation Programme (CIP) that pharmaceuticals can be found in our discharges and in the environment. We believe that these chemicals are both excreted from the body and introduced directly to the sewerage system. [REDACTED] will be able to share learnings from CIP and she already has a presentation setting out levels of pharms in the environment for those identified of concern in the CIP2 Scotland study.
- The IUW route map isn't specifically designed to tackle every possible pollution impact, and it focusses on water quality impacts as we currently understand these (WFD driven) and on sewage debris issues. However, the route map also focusses on general spill reduction and this will clearly reduce the volume of all pollutants from the sewerage system.
- The route map clearly identifies the role that source control should play in reducing impacts from spills. We believe that source control (both wrongly flushing items and policy change) is the most effective way to reduce plastics and other pollutants of concern (including pharmaceuticals),

On CAS' questions, I have provided a view from [REDACTED] and I below in red.

Regarding a meeting date, I don't have any leave in mid-March. If you can come up with a date, I'll move things around to suit.

[REDACTED]

SW Public
General

From: [REDACTED]@gov.scot>
Sent: 14 February 2022 11:07
To: [REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>
Cc: [REDACTED]@SCOTTISHWATER.CO.UK>
Subject: Pharmaceutical pollution session

****EXTERNAL MAIL**** - Think Before You Click

[REDACTED]

I'm coming back to an approach we had last year (which [REDACTED] is aware of) from CAS expressing an interest in an information session/discussion around pharmaceutical pollution and, subsequently, the Urban Water Routemap, including any role it has in helping to address pharma issues. My understanding is that is quite limited, given the reference in the Annex explaining there are a range of environmental impacts which are not fully understood including in respect of pharmaceuticals many of which are not considered in RBMP3 along with other issues including the impact of plastics on the freshwater and marine environment, other persistent chemicals in raw sewage including pharmaceuticals and hormones, viral pollution and microbial development/resistance.

The questions CAS have posed in suggesting an outline agenda are:

- How do pharma in water relate to the current CAS role? Is this issue within scope? If so, where? **For discussion but it seems that promoting positive customer behaviour in this area would complement the IUW route map perfectly. CAS's role could definitely help with measures such as responsible disposal of unused pharmaceuticals (ideally return to the pharmacy for safe disposal). This is especially important for antibiotics to reduce the threat of AMR. There would likely be benefit if CAS could work directly with the [One Health Breakthrough Partnership](#) of which [REDACTED] and [REDACTED] are both members. This partnership aims to reduce pharmaceutical pollution in the environment through sustainable One Health Innovation.**

- Where would a consumer awareness and behavioural change role and a SEPA role cross over? I'm not sure and perhaps one for discussion with SEPA. SEPA wouldn't regulate consumer behaviour which is perhaps why SEPA has historically looked for the water industry to provide the ultimate barrier to protect the environment (ie end of pipe treatment).
- What is the role of Scottish Water in reducing pharms reaching the environment? I think firstly a complimentary customer education message around disposal of pharmaceuticals. Beyond this, to deal with the normal excretion of these, we'd continue to look at spill reduction and consider where we might be able to treat to remove substances from our WwTW final effluent. Note that we don't have standards yet set out in WFD (or other relevant legislation) to drive improvement but in CIP3 we have a process optimisation trial looking at steroids and sampling to identify whether Real Time Control will give better reduction of substances of concern
- What are the potential impacts of pharms in water, on consumers and the environment? [REDACTED]' proposed presentation gives levels of pharms in the environment. The majority of impacts are at the lowest dilution WWTWs. EE2 is a more widespread issue and can cause feminisation of fish and ibuprofen is high both upstream and downstream of WWTWs. We have developed a visualisation tool which maps all pharms results across Scotland against env standards and publicly available prescription data.
- What is the impact of pharms entering the environment without treatment as a result of CSOs? This is a significant unknown. We know that CSO discharges are contain more dilute levels of sewage (and therefore more dilute levels of pollutants) than what arrives for treatment at the WwTW during dry weather. In general, a much higher volume of flow is treated at our WwTW than is lost through CSOs (75 – 95% of flow is treated at the WwTW depending upon catchment characteristics). Whether CSOs or WwTW are more polluting in terms of pharmaceuticals is a difficult question and I don't think we have the evidence to answer this – is the WwTW effective in removing pharma? is the dilute nature of CSOs more or less polluting than the treated final effluent? Our route map aspiration to progressively reduce spills through better management of surface water will help reduce the CSO loading of pharms.

Following discussions with CAS my understanding is they are particularly interested in gathering information to help them consider how they might promote positive consumer behavioural change in regard to disposal of medicines etc but they could be part of the wider awareness-raising effort in this area. WICS also have an interest and so we would look to include them in any session, and I will also look to bring in other policy colleagues with an interest too – e.g in relation to plastics /marine pollution ([REDACTED]) and water-environment pollution more widely ([REDACTED]), and possibly health colleagues leading on AMR policy.

[REDACTED], is this something you or a member of your team could support to provide an overview of the routemap having considered the points set out above? ([REDACTED] is aware we'd ask her to cover the CIP etc). If so could you suggest some dates that

would work for you and who to liaise with please and I'll follow up to help refine a useful agenda? I think we will be looking at early to mid-March, broadly speaking.

Happy to discuss.



[Redacted] | Water Policy and DECC
Operations Division | Scottish Government | 3F South | Victoria Quay |
Edinburgh | EH6 6QQ | [Redacted]

I am currently working from home, my normal working hours are 08:00-17:00

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Scottish Water

www.scottishwater.co.uk

From: [REDACTED]
To: [REDACTED]
Subject: FW: Urban Waters Routemap again
Date: 28 March 2023 07:54:28
Attachments: [RE Urban Waters Routemap again.msg](#)

[REDACTED] | Water Policy and DECC Operations Division |
Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]@SCOTTISHWATER.CO.UK>
Sent: 02 June 2022 09:23
To: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@gov.scot>; [REDACTED]@SCOTTISHWATER.CO.UK>
Cc: [REDACTED]@SCOTTISHWATER.CO.UK>
Subject: RE: Urban Waters Routemap again

Hi all

The email attached covers the position with the Forth Estuary UIDs. It identifies that 25 of the 26 UIDs identified as a priority when the study concluded are in development and are included in the published list of high Priority UIDs.

In December 2021, the UID list was re-prioritised with one Forth Estuary UID being reclassified as a low priority. This is not included in the published list of high priority UIDs but does remain in development, since this work had already started and the FE Study generated a need to look at this.

The attachment within the email from [REDACTED] sets out communication around a request from Shirley Anne Somerville, MSP.

If you need anything else, please let me know.

[REDACTED]

SW Internal
General

From: [REDACTED]@scottishwater.co.uk>

Sent: 01 June 2022 15:48

To: [REDACTED]@gov.scot>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]@SCOTTISHWATER.CO.UK>

Subject: RE: Urban Waters Routemap again

Hi All

Attached is the previous note I sent to [REDACTED] re Water of Leith. [REDACTED] has there been any further meetings with this group/ matters of significance that needs to be highlighted?

[REDACTED], anything specific to add regarding CSO's into the wider Forth?

Regards

[REDACTED]

[REDACTED]

[REDACTED]

Scottish Water

[REDACTED]

SW Internal

General

From: [REDACTED]@gov.scot>

Sent: 01 June 2022 15:33

To: [REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]
[REDACTED]@scottishwater.co.uk>; [REDACTED]@SCOTTISHWATER.CO.UK>

Subject: RE: Urban Waters Routemap again

Thanks [REDACTED] – as [REDACTED] is on leave this week I'd be grateful if either [REDACTED] or [REDACTED] are able to share what was provided to him in response to the SOS Leith query, I have our reply to the correspondence but it naturally focusses only on Water of Leith and not the wider issue of other CSOs that discharge into the Forth

[REDACTED] | Water Policy and DECC Operations Division |
Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]@SCOTTISHWATER.CO.UK>

Sent: 31 May 2022 13:48

To: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>

Cc: [REDACTED]@gov.scot>

Subject: RE: Urban Waters Routemap again

██████████

We landed on a briefing for SOS Leith for ██████████ that would likely answer ██████'s desire to have lines ready, don't you think?

This would also address any questions about coverage within the IUW Route Map I think.

Can you send the final version of this on to ██████? I don't know if I have it.

██████████

SW Internal
Personal

From: ██████████@gov.scot>

Sent: 31 May 2022 13:00

To: ██████████@SCOTTISHWATER.CO.UK>; ██████████

██████████@scottishwater.co.uk>

Subject: Urban Waters Routemap again

Importance: High

****EXTERNAL MAIL** - Think Before You Click**

██████████ – you may have seen the recent BBC article focussing on wet wipes and legacy sewage spills Firth of Forth – [Harmful bacteria survives longer on plastic Scottish beach waste - BBC News](#) - we need to have lines specific to the Forth estuary in case this gets picked up, so also copying ██████ who is aware of the article in case he has SW lines to hand? I've included lines we used from last year which we will need to update and so would appreciate any input you can offer please.

In briefing we pulled together for FMQ on spills last November we incorporated the following top line:

- *Across a 50,000-kilometre sewer network, with 3,614 combined sewage overflows, some 654 overflows (including 27 identified as impacting on the Firth of Forth) were identified by SEPA in 2019 as 'unsatisfactory' and are being prioritised for improvement.*

The text below was used to brief Ms McAllan in December last year as part of the Ministerial Statement package. From memory I think all 27 identified Scottish Water CSO assets in the Firth of Forth were included in the Routemap commitments but can't find the email trail between us from the time. Can you confirm if that's correct / still the case and if so, what priority the 27 (or

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Scottish Water

www.scottishwater.co.uk

From: [REDACTED]
To: [REDACTED]
Subject: FW: IUW Route Map - Update Tracker September 2022
Date: 28 March 2023 07:50:19
Attachments: [Outlook-q2niwrwr.png](#)

[REDACTED] | Water Policy and DECC Operations Division |
Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]@scottishwater.co.uk>
Sent: 05 October 2022 07:47
To: [REDACTED]@gov.scot>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>
Cc: [REDACTED]@scottishwater.co.uk>
Subject: Re: IUW Route Map - Update Tracker September 2022

Hi [REDACTED]

FYI - Following Alex Cole Hamiltons questions and a column he wrote in the Evening News (from memory), Douglas Millican and I had a meeting with him. We helped improve his understanding on combined sewer systems, explained the regulatory framework, the history of our relationship with developers and that surface water does not come into our combined sewers from new developments. We also discussed our surface water strategy and the work we are doing in Craighleith with CEC, Nature Scot, SEPA and others to 'retrofit' blue green infrastructure into the built environment.

We also touched on the knowledge we had built up on our network through our programme of environmental studies and that we had a prioritised list of CSOs where improvements were required to improve water quality or remove litter which informed our IUW route map.

[REDACTED]
[REDACTED] : Strategic Customer Service Planning :
Scottish Water



Ask me about the Carer's Network or visit our SharePoint page [Carers Network \(sharepoint.com\)](#)

From: [REDACTED]@gov.scot>
Sent: 04 October 2022 9:33 AM
To: [REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]
[REDACTED]@scottishwater.co.uk>
Cc: [REDACTED]@scottishwater.co.uk>
Subject: RE: IUW Route Map - Update Tracker September 2022

****EXTERNAL MAIL** - Think Before You Click**

[REDACTED]

Thanks for this update. I have some urgent questions for Ministerial correspondence which need a reply **today please**; apologies for the lack of notice. It concerns correspondence from Alex Cole-Hamilton to the Minister in which he refers to exchanges in Parliament in May following the Ferret article; he asks specifically in relation to sewage spills:

1. What steps have you and your government taken since May to ensure that untreated human waste is not dumped into Scotland's rivers?
2. Have you and your government now set targets to end the release of untreated human waste into Scotland's waters?
3. Will you and your government commit to speeding up the installation of spill monitors on all sewer overflows that discharge to designated bathing waters?

I'm working up an answer now to set the context and will deal with the target question but would appreciate your input across all three questions particularly 1 and 3 (in terms of plans and progress). Happy to discuss if helpful but have somewhat limited availability today

[REDACTED]

[REDACTED] | **Water Policy and DECC Operations Division | Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ |**
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]@SCOTTISHWATER.CO.UK>
Sent: 28 September 2022 12:08
To: [REDACTED]@gov.scot>; [REDACTED]
[REDACTED]@gov.scot>
Cc: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@sepa.org.uk>
Subject: IUW Route Map - Update Tracker September 2022

Hi all,

Please find attached update on IUW Route Map activities over the last month (2022 Activity – September tab).

There is lots more going on than space available in this spreadsheet so if you are looking for any more specifics, please let me know and I can get hold of a more detailed briefing.

Regards,

[Redacted]

[Redacted]

Strategic Customer Service Planning

Tel: [Redacted]

Email: [Redacted]@scottishwater.co.uk

SW Internal
Personal

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SW Internal
Commercial

From: [REDACTED]
To: [REDACTED]
Subject: FW: IUW Route Map - Update Tracker September 2022
Date: 28 March 2023 07:50:05

Sending through archived emails for EIR. More to follow...

[REDACTED] | Water Policy and DECC Operations Division |
Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]
[REDACTED]

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From: [REDACTED]@SCOTTISHWATER.CO.UK>
Sent: 05 October 2022 09:11
To: [REDACTED]@gov.scot>; [REDACTED]scottishwater.co.uk>
Cc: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@scottishwater.co.uk>
Subject: RE: IUW Route Map - Update Tracker September 2022

Hi [REDACTED]

2 points.

1. We are producing monthly updates on IUW progress for stakeholders but we aren't publishing this on our website. We think that this would be too much detail and that we should limit formal progress reporting (and publication) to an annual update.
2. You make reference to 27 WQ UIDs. There are now 26 with one being removed following completion of a study in Levenmouth.

Otherwise, great.

[REDACTED]

SW Internal
Personal

From: [REDACTED]@gov.scot>
Sent: 05 October 2022 08:58
To: [REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]
[REDACTED]@scottishwater.co.uk>
Cc: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@scottishwater.co.uk>
Subject: RE: IUW Route Map - Update Tracker September 2022
Importance: High

Thanks again – please see draft reply for any further comments.

[REDACTED] | Water Policy and DECC Operations
Division | Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ |
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]
Sent: 04 October 2022 18:24
To: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>; [REDACTED]
[REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Cc: [REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>; [REDACTED]
[REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Subject: RE: IUW Route Map - Update Tracker September 2022

Thanks [REDACTED], very helpful at such short notice. I'll send you a draft early tomorrow, probably borrowing heavily from this. We have no plans to set targets in this space, and will cover that appropriately in the reply

[REDACTED] | Water Policy and DECC Operations
Division | Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ |
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>
Sent: 04 October 2022 15:22
To: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>; [REDACTED]
[REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Cc: [REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>; [REDACTED]
[REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Subject: RE: IUW Route Map - Update Tracker September 2022

[REDACTED]

See below responses in red.

Let me know if you need more / an alternative angle.

[REDACTED]

SW Internal
Personal

From: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Sent: 04 October 2022 09:33
To: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>; [REDACTED]
[REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Cc: [REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>
Subject: RE: IUW Route Map - Update Tracker September 2022

Importance: High

****EXTERNAL MAIL**** - Think Before You Click



Thanks for this update. I have some urgent questions for Ministerial correspondence which need a reply **today please**; apologies for the lack of notice. It concerns correspondence from Alex Cole-Hamilton to the Minister in which he refers to exchanges in Parliament in May following the Ferret article; he asks specifically in relation to sewage spills:

1. What steps have you and your government taken since May to ensure that untreated human waste is not dumped into Scotland's rivers?

Scottish Water does not set out to dump human waste into Scotland's rivers. WwTWs meet very tight standards which are set out within licenses issued by SEPA and these remove the majority of pollutants from sewage to ensure that river and coastal water quality is protected. Occasionally WwTWs fail to meet the standards required but these exceedances are relatively rare, are usually marginal and last for very short periods of time. Scottish Water is heavily focussed on reducing instances of these failures. In the majority of catchments for which information is available, the significant majority of flow (sewage and rainwater) within the sewer system reaches the treatment works and is treated before discharge. However, in times of rainfall, Combined Sewer Overflows (CSOs) are designed to spill diluted sewage to the environment to avoid hydraulically overloading the sewer system and causing flooding of homes and businesses. These CSOs are also licensed by SEPA but Scottish Water acknowledges that these discharges are not always satisfactory and can cause problems, locally impacting water quality and causing sewage related debris in the environment. Recognising that improvements can be made, Scottish Water set out its 'Improving Urban Waters Route Map' in December 2021.

Since last December, Scottish Water has been focussing on the activities required to deliver the commitments set out within the Route Map. These activities have focussed on how Scottish Water will improve monitoring and reporting of spills from CSOs, how it will improve intelligence within its sewer network to allow it to respond more quickly and keep the public informed and how it will improve the highest priority CSOs to deliver improvements in water quality (to support Scotland's River Basin Management Plan) and reduce instances of sewage related debris in the environment. The commitments and timelines are clearly set out within the Route Map and Scottish Water is working hard to meet these.

2. Have you and your government now set targets to end the release of untreated human waste into Scotland's waters?

TBC. Can you share your proposed response please?

3. Will you and your government commit to speeding up the installation of spill

monitors on all sewer overflows that discharge to designated bathing waters?

Scottish Water's Improving Urban Waters Route Map includes a commitment to deliver 1,000 new CSO spill monitors to improve operational intelligence and to allow publication of improved performance information. Scottish Water has been reviewing the monitoring technology available and has been working to prioritise where monitors should be located to protect amenity, support public health, to better understand how the sewer network is performing and to make better decisions on investment priorities. Prioritisation is generating phases of work with the first phases focussing on protecting public health where waters are used for bathing. As part of its last investment programme, Scottish Water installed 59 new monitors within 1km of bathing waters where classification was 'at risk'. Scottish Water has completed the assessment of all CSO discharges within 2 km of designated bathing waters and intends to deliver around 250 of these during 2023 as the highest priority for improvement.

I'm working up an answer now to set the context and will deal with the target question but would appreciate your input across all three questions particularly 1 and 3 (in terms of plans and progress). Happy to discuss if helpful but have somewhat limited availability today

[REDACTED]

[REDACTED] | Water Policy and DECC Operations
Division | Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ |
[REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED] <[\[REDACTED\]@SCOTTISHWATER.CO.UK](mailto:[REDACTED]@SCOTTISHWATER.CO.UK)>

Sent: 28 September 2022 12:08

To: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>

Cc: [REDACTED] <[\[REDACTED\]@scottishwater.co.uk](mailto:[REDACTED]@scottishwater.co.uk)>; [REDACTED]

[REDACTED] <[\[REDACTED\]@sepa.org.uk](mailto:[REDACTED]@sepa.org.uk)>

Subject: IUW Route Map - Update Tracker September 2022

Hi all,

Please find attached update on IUW Route Map activities over the last month (2022 Activity – September tab).

There is lots more going on than space available in this spreadsheet so if you are looking for any more specifics, please let me know and I can get hold of a more detailed briefing.

Regards,

[REDACTED] [REDACTED]

[REDACTED]

Strategic Customer Service Planning

Tel: [REDACTED]
Email: [REDACTED]@scottishwater.co.uk

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Personal

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Loch Leven Media
Date: 13 January 2023 08:53:51
Attachments: [Kinross Investment.xlsx](#)
[Loch Leven discharges.xlsx](#)

Hi [REDACTED]

Thanks for the information. [REDACTED] team have been involved in a lot of discussion with stakeholders at Loch Leven culminating in a meeting in early December.

There is lots in your email but our current position is that we have two WwTW that perform to very high standards and remove the majority of phosphorus loading from the public sewerage system. In dry weather c 90% of P will be removed through dedicated P-removal plant installed in the mid 90's at Milnathort and, we think, late 90's at Kinross (see timeline attached).

In wet weather, spills will occur in the network and at the WwTW. We don't have any detail on the quality of these discharges but modelling we have done in the past has used industry standard assumptions for SRP loading rates from CSOs. These assumed rates are around the same as for treated sewage (ie the diluting nature of storm water reduces concentrations from dry weather concentrations) although, given volumes, loading from overflows in very wet weather will likely be higher than loading from the WwTWs in very wet weather. P loading in the public sewerage system is an absolute value – ie the loading from domestic and industrial processes is a fixed maximum – this doesn't increase with rainfall (ie like the agricultural contribution might) and only the balance of treated / overflow P loading will be impacted by wet weather events.

Reports have previously put the SW P loading element from CSOs and WwTWs at around 10% of the total loading to the loch with agriculture, private sewage treatment, birds and sediment demand all having a bigger impact. In these reports we have included our loading from CSOs and WwTWs.

We are limited in what more we can do to reduce our contribution (any more treatment or spill reduction would be capital and carbon heavy) and would likely be disproportionate in terms of the benefits realised. We will continue to work with SEPA and look to support where possible. We need to be looking to target where the best cost / benefit profile is in the improvements that could be made.

See also attached a list of the 7 WwTW and 5 CSO discharges that we have as discharging Loch Leven.

Please let me know if the improvement timeline information is sufficient for you or whether you need anything else.

SW Internal
Personal

From: [REDACTED]@gov.scot>

Sent: 11 January 2023 16:53

To: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>

Subject: Loch Leven Media

****EXTERNAL MAIL**** - Think Before You Click

[REDACTED] [REDACTED]

You may have seen there was quite a lot of media over the Christmas period about Loch Leven, algal blooms and storm overflows, see below. In particular, Perth and Kinross Council passed a motion just before Christmas requiring the council leader write to Ms McAllan to request the environment secretary ask SEPA to introduce a weight limit on the amount of phosphorus deposited into Loch Leven. They are also seeking “far tighter controls” to “stop Scottish Water depositing untreated sewage into Loch Leven and that all such overspill events are recorded and reported (see Daily Record 27 Dec).

3 Jan [Community speak out over Loch Leven sewage debacle \(thecourier.co.uk\)](https://www.thecourier.co.uk)

31 Dec [Bid for Loch Leven to become protected wild swimming hotspot | The Scotsman](#)

[Plans floated for Loch Leven to become protected wild swimming hotspot | The National](#)

[Green MSP calls for Scotland's first 'wild swimming hotspot' | HeraldScotland](#)
[Campaign to clean up Loch Leven as a protected wild swimming hotspot \(thecourier.co.uk\)](https://www.thecourier.co.uk)

27 Dec <https://www.dailyrecord.co.uk/news/local-news/perth-kinross-councillors-call-action-28821701>

22 Dec [Local council demands action over toxic 'bright green' Loch Leven | The National](#)

You'll be aware Loch Leven is designated as a nutrient sensitive area under the Urban Waste Water Treatment (Scotland) Regulations 1994 so both Milnathort and Kinross WwTWs have to meet much tighter total phosphorus standards. Can you identify the historical investments made at Milnathort and Kinross WwTWs to introduce phosphorus treatment and roughly when this was implemented? Any other useful information you may have in relation to improvements to Loch Leven discharges and infrastructure would also be useful.

For wider context, the Scottish Government sets out the phosphorus standards for lochs in Directions to SEPA based on an annual mean total phosphorus concentration ($\mu\text{g/l}$) and monitoring and assessment by SEPA against this standard indicates Loch Leven is poor. Hence, the RBMP SEPA Priority Catchment farm visits underway aiming to reduce rural diffuse pollution. SEPA uses these standards to model the impact from any sewage discharges to the loch so a weight limit is already in place.

The increase in algal blooms starting in 2018 is more likely due to higher loch temperatures in the summer recycling phosphorus stored in the Loch sediments as Loch Leven is a naturally eutrophic (nutrient-rich) loch, which sets it apart from other large lochs in Scotland. Climate change or land use change may also be causing the increase in phosphorus contribution from rural diffuse pollution.

The most recent 2017 [Loch Leven nutrient load and source apportionment study. Scottish Natural Heritage Commissioned Report No. 962](#) strongly indicates that since 1985 point source discharges (including Milnathort and Kinross storm overflows) have been significantly reduced and rural diffuse pollution remains the major contributing factor (see graphs below). The report did recommend further investigation of the Kinross WwTW contribution which I assume was undertaken. The report is based on 2015 monitoring data so if rainfall has increased by 40% then it would be no surprise storm overflows may be spilling more frequently. As you know SEPA is working with you to investigate and assess current storm overflow contributions further. Obviously recording and reporting overspill events in itself isn't going to help understand the potential impacts from storm overflows and a much more comprehensive study would need to be undertaken.

Happy to discuss of course. If it were possible to dig out the information by the end of the week or sooner it would be greatly appreciated. There's no firm deadline but we need to be ready to respond to queries from the Minister which we are anticipating, or we will brief her first, so sooner is better...

[REDACTED] | Water Policy and DECC
Operations Division | Scottish Government | 3F South | Victoria Quay |
Edinburgh | EH6 6QQ | [REDACTED]

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Scottish Water

www.scottishwater.co.uk

From: Ask
To: [REDACTED]
Cc: [REDACTED]
Subject: OME ID:2694 - River Almond Action Group - River Almond
Date: 11 July 2022 17:23:01
Attachments: [image001.png](#)
[image002.png](#)

OFFICIAL

Hi [REDACTED]

Thank you for your enquiry.

In response to your request:

RBMP

- There are 21 water bodies in the River Almond catchment (see Fig 1). The RBMP has set objectives for 8 water bodies to achieve Good by 2027 and 12 to achieve Moderate, with further improvements expected after that.
- There are a wide variety of pressures that SEPA has identified on the Almond (Fig 2). Here is an update on the main measures being taken forward to tackle them:
 - Fish barriers - The Almond barriers work (a collaboration between West Lothian Council, City of Edinburgh Council, Forth River Trust, ScotGov and SEPA) will see 7 local authority weirs in the Almond catchment eased for fish passage by 2023. Work funded by WEF at the 6 of the weirs has already been completed and the final weir at Dowies Mill will be actioned in 2023. An additional small private weir has been removed by the Forth Rivers Trust using NatureScot funding. On completion, the actions at all 8 weirs will open up 298 km of accessible river length to migrating wild fish.
 - Agricultural pollution - to tackle rural diffuse pollution, the Almond catchment is on the workplan for a SEPA priority catchment project for 2023, which is planned to involve 133 initial farm inspections.
 - Wastewater discharges - SEPA is ensuring that all Scottish Water RBMP measures achieve Development stage (ie design, preparation and planning) by 2024 so as to enable subsequent delivery on the ground by 2027. This work is on track and represents a significant investment by Scottish Water. Seven wastewater treatment works and six combined sewer overflows were identified during the River Almond Strategic Environmental Study (signed off by SEPA) as requiring improvement in order to deliver the RBMP water quality objectives and these are now going through Development stage. Meanwhile, SEPA's Almond Compliance Audit project is underway, with our Environmental Performance team currently undertaking preparatory work prior to on site inspections, in the form of desk-based assessments. This will allow us to appropriately prioritise the on-site inspections which will be undertaken later this year. Further updates will be provided once the inspections have been completed.
 - Sewage litter - In line with the Improving Urban Waters route map, Scottish Water has agreed to progress high priority sewer overflows requiring screens to address significant litter issues. The [prioritisation criteria](#) and list of high priority overflows have now been published. There are 2 overflows in the Almond which have been determined as being of high priority (Lochend Road and Ratho Terminal wastewater pumping station) and these are currently in Development stage, which SEPA will ensure is completed by 2024.
 - Spill monitoring - As part of its intelligent sewer network trial and at SEPA's request to investigate flows arriving at East Calder wastewater treatment works, Scottish Water has installed sensors in the East Calder sewer system, as well as event data loggers to monitor spills at key sewer overflows in the Almond. This will help identify any issues with sewer flows.

River Almond Water Quality Improvement Group

- The Group has now met several times and is an engaged and proactive community group. Those leading the group have professional experience in environmental management/water quality/blue-green infrastructure which is helpful when discussing issues and opportunities on the River Almond. While their focus so far has been on the bathing water designation, they are already involved in implementing community-based improvements to water management (namely the funding and location of water butts to collect surface water run off from residential housing).
- There is huge potential for this group to help identify further opportunities to improve water quality 'at the top of the pipe' in the community, whether from supporting campaigns to stop wipes being flushed, raising awareness of drainage systems to limit what is put down the drain, just to give two examples. Scottish Water has been working with the local community and SEPA to develop a Lighthouse project.
- The most recent meeting (1 July) discussed the bathing water application outcome and whether users can have more real-time information about water quality even though Almondell has not been designated. Previous meetings have discussed the operation of East Calder wastewater treatment works and the intelligent sewer network approach that Scottish Water is trialling in the East Calder catchment.

Happy to discuss the above further
Best regards

[REDACTED]

Figure 1 – Almond catchment objectives

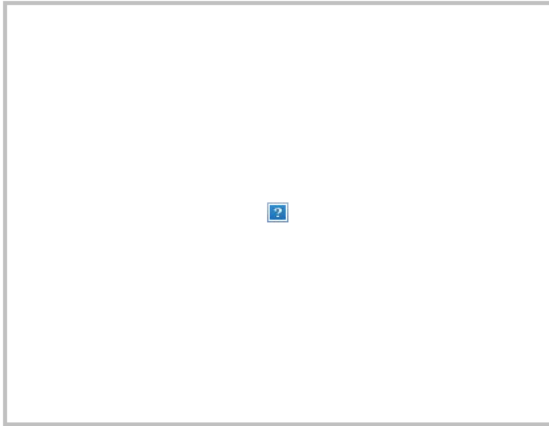
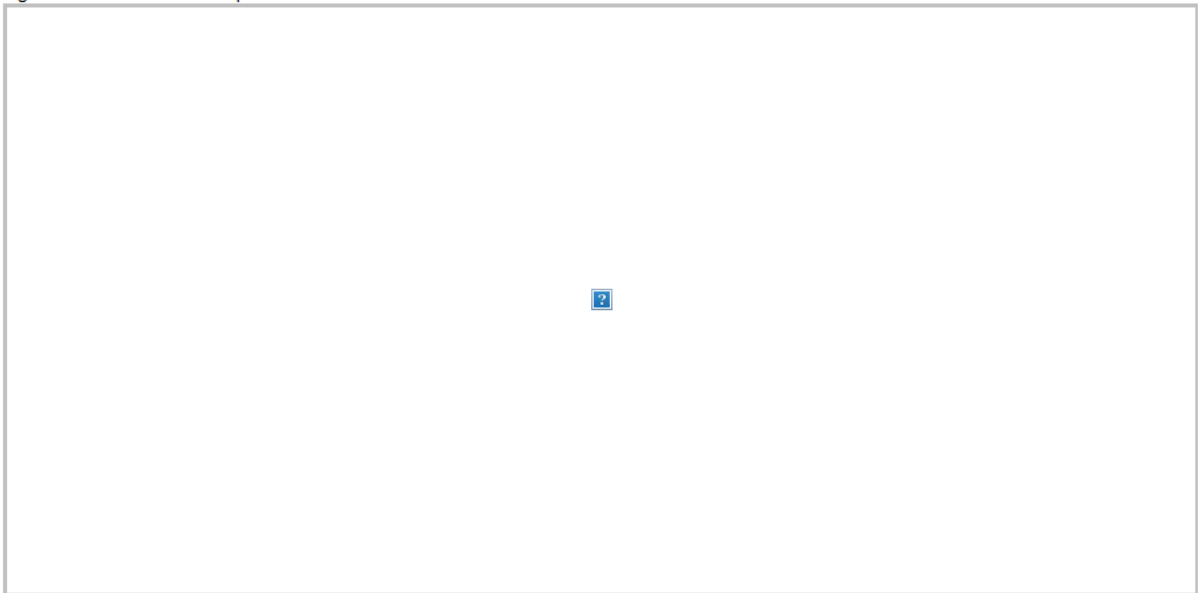


Figure 2 – Almond catchment pressures



OFFICIAL

From [REDACTED]@gov.scot>

Sent: 05 July 2022 14:32

To: Ask <Ask@sepa.org.uk>

Cc: [REDACTED]@sepa.org.uk; [REDACTED]@sepa.org.uk; [REDACTED]@gov.scot

Subject: River Almond Action Group - River Almond

CAUTION This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Ask

Angela Constance MSP has written to the Minister for Environment and Land Reform (see attached) requesting that she meet with the River Almond Action Group (RAAG) as the group believe the River Almond should be safe to swim in and if not the public should be advised when water quality is poor.

I have the attached email that SEPA sent to the Forth District Salmon Fishery Board in May 2021 that provides detailed information on the planned improvements and would appreciate an update from SEPA. I would also like an update on the River Almond Water Quality Improvement Group.

In general, the improvement works already undertaken on the River Almond and those planned through RBMP are a great positive news story given the historic condition of the river. I would appreciate a summary of the improvements to the river so far and where we expect it to be by 2027 and beyond from a wildlife and water quality perspective, including the level of investment to achieve this.

Please can you give me a response by **Monday 11 July**.

Thanks

[REDACTED]

[Redacted]

(I am currently working from home and can be contacted via email only)

Water Environment Team
Environmental Quality & Resilience Division
Environment & Forestry Directorate
Tel: [Redacted]

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From: [REDACTED]
To: [REDACTED]
Subject: Loch Leven media enquiry
Date: 21 October 2022 16:41:25

OFFICIAL

Hi [REDACTED]

Hope you are well.

We received a media enquiry earlier this week from the Perthshire Advertiser regarding Loch Leven sewage pollution. I know you have been involved in previous discussions about this so wanted to share our response with you for awareness.

The journalist contacted us following a pollution incident in September and wanted to know what areas are being prioritised for upgrades, how much it will cost to replace the sewer network and what action SEPA is taking to prevent CSO discharges. He also questioned how bad things would have to get for Loch Leven to be a higher priority.

We are returning the following statement.

A spokesperson for the Scottish Environment Protection Agency (SEPA) said:

“Many parts of the Scottish sewer network are historic and have Combined Sewer Overflows (CSOs). These are designed to prevent sewers from backing up and flooding homes, streets and sewage works by discharging during heavy rainfall. It would not be appropriate for SEPA to prevent a discharge happening as this would lead to damage via sewer flooding.

“This was the situation at the Kinross Waste Water Treatment works on 8 September. The incident was reported to SEPA, which contacted Scottish Water to check both the Sewage Treatment Works and the burn. Scottish Water confirmed that they were already on site and a clean-up was underway of the affected area. They also confirmed that the sewage works was operating and running normally. SEPA officers subsequently attended the site and found no evidence of sewage debris or pollution in the burn.

“SEPA is working with Scottish Water to prioritise areas across Scotland for upgrade where there is the greatest impact from CSO discharges. However, the most recent study of pollution in Loch Leven highlighted that 86% comes from diffuse rural sources. To tackle this, SEPA is undertaking rural land use assessments in the catchment area and ensuring landowners are complying with the General Binding Rules to control pollution.

“We continue to encourage members of the public to report signs of pollution online at www.sepa.org.uk/report or by calling the SEPA Pollution Hotline on 0800 80 70 60.”

Notes to editor

- More information about CSO's and upgrade work is available via SEPA's [website](http://www.sepa.org.uk).

A [list of priority assets](#) was published by Scottish Water in December 2021. The [estimated investment required](#) was also detailed at the time by Scottish Water.

- *Details of the source apportionment study for Loch Leven can be found on NatureScot's [website](#).*
- *[More information](#) about diffuse pollution and the General Binding Rules.*

Have a great weekend when it comes.

Many thanks,


Communications Officer

 [@sepa.org.uk](mailto:sepa@sepa.org.uk)

Scottish Environment Protection Agency | Strathallan House, Castle Business Park, Stirling, FK9 4TZ

Newsdesk: (Mon-Fri 9am-5pm)

Contact: 07557 497 947 | media@sepa.org.uk

Out of hours:

Contact: 07557 497 947 to speak to the Duty Press Officer

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3 sheets of A4 paper = 1 litre of water

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Ofis chlàraichte: Taigh Srath Alain, Pàirc Gnòthachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm

OFFICIAL

From: [REDACTED]
To: [REDACTED]
Subject: FW: Tayport beach
Date: 29 August 2022 09:39:20

For info

[REDACTED] | Water Environment | Environmental Quality and Resilience Division
Environment and Forestry Directorate | Scottish Government

Tel: [REDACTED] | Email: [REDACTED]@gov.scot

From: [REDACTED]@sepa.org.uk>

Sent: 26 August 2022 16:07

To: Communications Net Zero & Rural Affairs

<CommunicationsNetZero&RuralAffairs@gov.scot>; [REDACTED]

[REDACTED]@gov.scot>

Subject: Tayport beach

OFFICIAL

Good afternoon,

Hope you are well.

SEPA received media enquiries from STV and The Courier regarding sewage debris at Tayport beach today.

For info – we issued the following statement in response.

A spokesperson for the Scottish Environment Protection Agency (SEPA) said:

“We were notified by a member of the public of sewage related debris at Tayport beach on Friday 26 August 2022.

"Initial enquiries suggest this to be a sewage drift from Combined Sewer Outfall (CSO) discharges as a result of recent heavy rainfall.

“A Scottish Water clean-up team has been deployed to remove the debris and SEPA will continue to liaise with Scottish Water until this work is complete.

“We continue to encourage anyone concerned about potential pollution to report

this online at www.sepa.org.uk/report or by calling the SEPA Pollution Hotline on 0800 80 70 60.”

Notes to editor

• *This is not related to the sewage leak at Riverside Drive, Dundee earlier this week.*

• *CSOs are an integral part of most sewer networks, ensuring that sewers do not back up and flood homes, streets and sewage works during bad weather. It is therefore normal for them to spill during heavy rainfall.*

Please can you pass this on to anyone else required.

Many thanks,

[Redacted]

Communications Officer

[Redacted]

[@sepa.org.uk](mailto:[Redacted]@sepa.org.uk) | [Message me on Teams](#)

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3 sheets of A4 paper = 1 litre of water

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Ofis chlàraichte: Taigh Srath Alain, Pàirc Gnòthachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm

OFFICIAL

From: [REDACTED]
To: [REDACTED]
Subject: FW: Loch Leven letter
Date: 26 October 2022 19:43:23
Attachments: [image001.jpg](#)
[RE Letter regarding Loch Leven .msg](#)

For awareness.

[REDACTED]
Communications: News (Net Zero & Energy)
Scottish Government, St Andrew's House
e: [REDACTED]@gov.scot
m: [REDACTED]

From: [REDACTED]@sepa.org.uk>
Sent: 26 October 2022 18:08
To: [REDACTED]@gov.scot>
Cc: [REDACTED]@gov.scot>; [REDACTED]@sepa.org.uk>
Subject: RE: Loch Leven letter

OFFICIAL

Hi both,

Just getting in touch regarding this article published in the Courier - [Sewage on Loch Leven path 'normal', argues Sepa \(thecourier.co.uk\)](#)

SEPA has been in touch with the Courier today regarding a couple of inaccuracies in this article – which I've attached for your information. This article has now been updated.
Given that the letter was issued on behalf of the minister, sharing for your info and awareness.

Kind regards,

Nicola

[REDACTED]
Communications Officer
Media and Public Affairs

Scottish Environment Protection Agency (SEPA) | Strathallan House | Castle Business Park | Stirling FK9 4TZ

M: [REDACTED]
E: [REDACTED]@sepa.org.uk

SEPA News Desk

Office hours (Mon – Fri 9am – 5pm):
Contact: 07557 497 947 | media@sepa.org.uk

Out of hours:

Contact: 07557 497 947 to speak to the Duty Press Officer.

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Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ.

OFFICIAL

From: [REDACTED]@gov.scot <[REDACTED]@gov.scot>
Sent: 25 October 2022 17:13
To: [REDACTED]@sepa.org.uk
Cc: [REDACTED]@gov.scot
Subject: RE: Loch Leven letter

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Thanks [REDACTED] – copying in [REDACTED] as she had been dealing with related issues.

[REDACTED]

[REDACTED] | Communications: News (Net Zero and Energy)
[REDACTED]
Scottish Government, St Andrew's House
e: [REDACTED]@gov.scot
m: [REDACTED]

From: [REDACTED]@sepa.org.uk
Sent: 25 October 2022 15:39
To: [REDACTED]@gov.scot
Subject: Loch Leven letter

OFFICIAL

Hi [REDACTED],

Sharing the following media request which SEPA has received for your information and awareness:

We are going to be writing an article which will share details about a letter which Councillor Willie Robertson received from [REDACTED], a staff member at SEPA. This was written on behalf of Màiri McAllan. We will not be quoting [REDACTED] by name.

This letter relates to the sewage overflow at Loch Leven which occurred on September 8.

Councillor Willie Robertson said the letter and the response he received from SEPA is "unacceptable".

*Can we please receive any further comments you have on this letter by latest 5pm today?
Apologies for the short notice.*

I've sign posted the journalist to the Scottish Government in relation to the letter. I've included the journalist's follow up email below.

We've also shared the following statement from the journalist.

A spokesperson for the Scottish Environment Protection Agency (SEPA) said: "Many parts of the Scottish sewer network are historic and have Combined Sewer Overflows (CSOs). These are designed to prevent sewers from backing up and flooding homes, streets and sewage works by discharging during heavy rainfall. It would not be appropriate for SEPA to prevent a discharge happening as this would lead to damage via sewer flooding.

"This was the situation at the Kinross Waste Water Treatment works on 8 September. The incident was reported to SEPA, which contacted Scottish Water to check both the Sewage Treatment Works and the burn. Scottish Water confirmed that they were already on site and a clean-up was underway of the affected area. They also confirmed that the sewage works was operating and running normally. SEPA officers subsequently attended the site and found no evidence of sewage debris or pollution in the burn.

"SEPA is working with Scottish Water to prioritise areas across Scotland for upgrade where there is the greatest impact from CSO discharges. However, the most recent study of pollution in Loch Leven highlighted that 86% comes from diffuse rural sources. To tackle this, SEPA is undertaking rural land use assessments in the catchment area and ensuring landowners are complying with the General Binding Rules to control pollution.

"We continue to encourage members of the public to report signs of pollution online at www.sepa.org.uk/report or by calling the SEPA Pollution Hotline on 0800 80 70 60."

Notes to editor

- More information about CSO's and upgrade work is available via SEPA's website. <https://www.sepa.org.uk/environment/water/improving-urban-waters/>
- A list of priority assets was published by Scottish Water in December 2021. <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Key-Publications/Urban-Waters-Improvements>
- The estimated investment required was also detailed at the time by Scottish Water. <https://www.sepa.org.uk/media/594084/211202-improving-urban-waters-sw-reply-to-sepa-2-december-2021.pdf>
- Details of the source apportionment study for Loch Leven can be found on NatureScot's website. [SNH Commissioned Report 962: Loch Leven nutrient load and source apportionment study \(nature scot\)](#)
- More information about diffuse pollution and the General Binding Rules. <https://www.sepa.org.uk/regulations/water/diffuse-pollution/diffuse-pollution-in-the-rural-environment/>

Kind regards,

██████

██████████

Communications Officer
Media and Public Affairs

From: [Ask](#)
To: [REDACTED] [Ask](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: OME ID:3032 - Loch Leven, Pollution incident
Date: 17 October 2022 16:26:10
Attachments: [image001.png](#)

OFFICIAL

H [REDACTED],

In addition to the useful context below I can provide some incident-specific information.

As soon as the incident on 8 September was reported, SEPA contacted Scottish Water to check both the Sewage Treatment Works and the burn. Scottish Water confirmed that they were already on site. They also confirmed that the sewage works was operating and running normally.

During heavy rain, the storm tank at Kinross sewage works begins to fill. The storm tanks are there to catch the 'first flush' from the network which is the most concentrated effluent to prevent this from entering the water environment. Once the rain event is over the storm tank is emptied back into the sewage works for full treatment. If the rain event is prolonged the storm tank will overflow via COPA Sacks (screens) to the watercourse. This is licenced by SEPA and part of the normal operation of sewage works.

SEPA attended the following week and found no evidence of sewage debris or pollution in the burn. Scottish Water regularly check the culvert entrance to ensure it is not blocked with any debris and carry out a clean of the bars to remove leaves and any other blockages. This ensures the burn can flow freely into the culvert before entering the loch.

Scottish Water have invested in new, larger screens at the inlet to the sewage works, made improvements for accessing the COPA Sacks at the storm tank overflow to maintain them and have new flow meters within the works to record flows at the works.

Regards

[REDACTED]

[REDACTED]

Public Affairs
Scottish Environment Protection Agency

[REDACTED] [@sepa.org.uk](mailto:[REDACTED]@sepa.org.uk)

[REDACTED]

OFFICIAL

From: [REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot)>
Sent: 17 October 2022 09:29

To: Ask <Ask@sepa.org.uk>

Cc: [REDACTED]@gov.scot; [REDACTED]@sepa.org.uk

Subject: RE: OME ID:3032 - Loch Leven, Pollution incident

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED]

The response below from SEPA does not provide me with any of the detailed information I requested regarding the environment events reported to SEPA, as follows:

- *Please provide information of the incident including SEPA actions, the impact on Loch Leven, past and future planned Scottish Water investment, etc.*

I already know all the general information provided by SEPA because I was closely involved in its development within SG from a policy and legislative perspective.

Please provide the specific information I requested ASAP.

Thanks

[REDACTED]

[REDACTED]

(I am currently working from home and can be contacted via email only)



Water Environment Team
Environmental Quality & Resilience Division
Environment & Forestry Directorate
Tel: [REDACTED]

From: Ask <Ask@sepa.org.uk>

Sent: 14 October 2022 15:34

To: [REDACTED]@gov.scot

Cc: [REDACTED]@gov.scot

Subject: OME ID:3032 - Loch Leven, Pollution incident

OFFICIAL

Dear [REDACTED]

Thank you for your enquiry please see our response below.

SEPA aim to be a firm, fair and effective regulator, to help improve and protect Scotland's environment. Operators are expected to uphold the conditions of their authorisations and we have powers of enforcement if they fail to meet these conditions.

Over the past 20 years, SEPA has worked with Scottish Water to deliver significant improvements to the water environment through upgrades to the sewage collection and treatment systems. Between 2010 and 2021, SEPA required Scottish Water to improve 279 sewer overflows and 104 wastewater treatment works, which were causing significant pollution. As a result, water quality is now at its highest level to date, with 87% of Scotland's waters having good or better water quality, as set out in the River Basin Management Plan that SEPA published in December 2021 (The River Basin Management Plan 2021-27).

In 2021, SEPA wrote to Scottish Water setting out our expectations and timetable for a route map to improve urban waters as part of the actions required in the River Basin Management Plan 2021-2027, further information is available on our webpage about [improving Urban Waters](#). In December 2021, Scottish Water published a [route map for improving urban waters](#). This sets out actions required by Scottish Water, as a public body and responsible authority for River Basin Management Planning, as well as significant work needed with other wpartners to deliver long term improvements.

The effect of rainfall in a combined sewer area, such as that in Kinross, can lead to the operation of overflows to the water environment. This can be particularly acute in areas with older drainage networks which will include the connection of surface water from many roofs and some hard standing areas such as roads and car parks. More recent development will have incorporated restrictions on the entry of surface water to the system so would contribute much less to the additional flows during periods of heavy rain. The improvement to remove surface water from these historic sewers is difficult and requires multi-million-pound investment. SEPA will continue to work to improve the environment in the Loch Leven catchment and work towards having these historic sewer networks upgraded to reduce the impact on the environment from combined sewer overflows.

Scottish Water has committed investment in recent years to improve infrastructure within Kinross sewage works and SEPA will continue to monitor and work with Scottish Water as it invests and improves all sewage treatment plant sites where this is required.

Recent inspections of the sewer network and sewage works in Kinross and Milnathort showed compliance with licence conditions.

If we can be of any further help, please let us know.

Kind regards



OME Administrator
Scottish Environment Protection Agency (SEPA)

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Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

OFFICIAL

From: Ask <Ask@sepa.org.uk>
Sent: 29 September 2022 15:55
To: [REDACTED]@gov.scot
Cc: [REDACTED]@gov.scot
Subject: OME ID:3032 - Loch Leven, Pollution incident

OFFICIAL

Dear [REDACTED]

Thank you for your enquiry, I have passed to colleagues and we will respond as soon as possible.

If we can be of any help in the meantime, please let us know.

Kind regards

[REDACTED]
OME Administrator
Scottish Environment Protection Agency (SEPA)

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am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist.

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Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

OFFICIAL

From: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Sent: 29 September 2022 15:38
To: Ask <Ask@sepa.org.uk>
Cc: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: FW: Loch Leven, Pollution incident

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Dear Ask

The Minister has received the following email correspondence from Councillor Willie Robertson, see below, regarding untreated sewage discharges to Loch Leven from Kinross WWTW .

Please provide information of the incident including SEPA actions, the impact on Loch Leven, past and future planned Scottish Water investment, etc.

I'd appreciate a response by **Friday 14 October**.

Thanks

[REDACTED]

[REDACTED]

(I am currently working from home and can be contacted via email only)



Water Environment Team
Environmental Quality & Resilience Division
Environment & Forestry Directorate
Tel: [REDACTED]

From: Councillor William Robertson <WBRobertson@pkc.gov.uk>
Sent: 21 September 2022 11:00
To: McAllan M (Màiri), MSP <Mairi.McAllan.MSP@Parliament.scot>
Cc: Councillor Dave Cuthbert <DCuthbert@pkc.gov.uk>; Councillor Richard Watters <RWatters@pkc.gov.uk>; Councillor Neil Freshwater <NFreshwater@pkc.gov.uk>
Subject: Loch Leven, Pollution incident

CAUTION: This e-mail originated from outside of The Scottish Parliament. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Ms. McAllan,

I am contacting you with regard to a serious pollution incident which occurred at Loch Leven earlier this month. As you may well know Loch Leven is a SSSI and RAMSAR site so is given special protection under European and UK legislation.

I contacted SEPA following a major incident which resulted in countless amounts of raw sewage entering Loch Leven from the Kinross WWTP. This is becoming a more and more common occurrence.

What really worried me was the reply I have received from SEPA. Any landowner/farmer who allowed this to happen would be prosecuted but when Scottish Water is the culprit it appears to be regarded as 'just one of these things'. The special protections allocated to Loch Leven seem to count for nothing.

I am sure you will be as alarmed as I am at the apparent relaxed attitude being taken by SEPA in their duties to protect our environment. Loch Leven already suffers from increasing instances of toxic algal blooms due to the amount of phosphorous (P) entering the loch and there are ongoing efforts to reduce this. It is totally unacceptable here in Kinross-shire that our most valuable asset, Loch Leven, is being used as an open sewer by Scottish Water and that SEPA are turning a blind eye to this.

I would welcome your comments on this situation and would be grateful for any actions you can take to prevent further damaging pollution incidents such as the one I have highlighted.

Kind regards,

Councillor Willie Robertson
Kinross-shire Ward,
Perth and Kinross Council

From: [REDACTED] <[\[REDACTED\]@sepa.org.uk](mailto:[REDACTED]@sepa.org.uk)>
Sent: 20 September 2022 11:26
To: Councillor William Robertson <WBRobertson@pkc.gov.uk>
[REDACTED] <[\[REDACTED\]@sepa.org.uk](mailto:[REDACTED]@sepa.org.uk)>
Subject: RE: Pollution incident

OFFICIAL

Dear Councillor Robertson,

I understand your concern and support your aims of protecting the Loch. However, due to the historic design of sewers taking both surface water and foul water discharges into the main sewer pipeline, means that during periods of heavy rainfall the diversion of surface water into the sewer leads to the amount of effluent in the sewer exceeding the capacity of the sewer. Therefore, it needs to discharge quickly either via emergency overflow to the environment or will back up the pipework and cause sewer flooding inside residential and industrial properties. Obviously, your constituents would not appreciate their homes being flooded with sewage. Therefore, until the entire historic sewer network is replaced, separating out the foul water from the surface water, the only other alternative is discharge to the environment during periods of heavy rainfall. This is not a system unique to the Loch Leven Catchment and is the historic standard sewer design across Scotland.

SEPA are working with Scottish Water to prioritise areas for upgrade where there is the greatest impact from these discharges due to the historic sewer design. More information on this work can be found on the SEPA website at the following address: [Improving urban waters | Scottish Environment Protection Agency \(SEPA\)](#)

Furthermore, as Scottish Water, SEPA and Local Authority Planners are aware of this problem, the combined sewers that take both surface and foul water are no longer permitted to be installed for new developments. All new developments are being built with separate surface water and foul water pipework. Therefore, they do not experience the same impact from rainfall that the historic network does and do not contribute to the requirement to discharge during periods of heavy rainfall.

SEPA understand and sympathise with your frustration at this situation, but the removal of these historic sewers will require multi-million pound investment and as this is public money it requires to be planned and spending to be justified. SEPA will continue to work to have these historic sewer networks upgraded to reduce the impact on the environment.

Kind regards,

[Redacted]

[Redacted]
[Redacted]
Fife, Angus & Dundee Team
Scottish Environment Protection Agency
[Redacted]
www.sepa.org.uk

OFFICIAL

From: Councillor William Robertson <WBRobertson@pkc.gov.uk>

Sent: 18 September 2022 10:28

To: [Redacted] <[\[Redacted\]@sepa.org.uk](mailto:[Redacted]@sepa.org.uk)>

Cc: [Redacted] <[\[Redacted\]@nature.scot](mailto:[Redacted]@nature.scot)>

From: [Ask](#)
To: [REDACTED]
Cc: [REDACTED]; [Ask](#)
Subject: RE: Hawick WWTW, Scottish Borders
Date: 07 June 2022 17:39:35
Attachments: [image001.jpg](#)
[image002.png](#)

OFFICIAL

Hi [REDACTED]

Please find below some information in response to points raised.

- There are 3,614 CSOs within the 50,000km of sewer network in Scotland (equivalent of one for every 15km). These are intended to spill during heavy rainfall to prevent sewer flooding of properties and uncontrolled pollution of the water environment.
- Over the past 20 years, SEPA has worked with Scottish Water to deliver significant improvements to the water environment through upgrades to the sewage collection and treatment systems. Between 2010 and 2021, SEPA required Scottish Water to improve 279 sewer overflows and 104 wastewater treatment works. These were prioritised in Scottish Water's previous investment programmes in [2010-2015](#) and [2015-2021](#) because they were causing significant pollution. As a result, water quality is now at its highest level to date, with 87% of Scotland's waters having good or better water quality.
- During 2021, SEPA wrote to Scottish Water setting out [expectations and timetable](#) for a route map to improve urban waters as part of the actions required in the River Basin Management Plan 2021-2027. SEPA highlighted the need for a step change in efforts to tackle the most significant environmental impacts as soon as possible and to take a One Planet Prosperity approach to improving Scotland's urban waters for the long term. In December 2021, Ms McAllan announced the publication of Scottish Water's [route map for improving urban waters](#), which sets out investment to improve water quality, increase monitoring and reporting of spills for the public, significantly reduce sewage related debris in the environment and reduce spills from the sewer network.
- The article that the MP's constituent refers to relates to a Freedom of Information request that the BBC submitted to Scottish Water. SEPA did not provide any data or comment for this article. The BBC article analysed the data provided by Scottish Water and reported that 75% of Scottish Water's emergency overflows arising from Hawick WWTW. This is not correct, for reasons explained below.
- Hawick Wastewater Treatment Works (WWTW) is licensed under the Controlled Activities Regulations. The licence authorises discharges from three overflows: the Emergency Overflow in the event of mechanical breakdowns or power failures, as well as overflows from the Combined Sewer Overflow and/or the Settled Storm Sewage Overflow in the event of heavy rainfall.
- Due to the high number of emergency overflows reported, SEPA has required Scottish

Water to check and confirm the accuracy of the overflow data it submitted to SEPA for 2021. Scottish Water have confirmed that, following investigation, the spill data reported at Hawick WWTW was incorrect in relation to the Emergency and Combined Sewer overflows.

- Following this investigation, Scottish Water has corrected the spill data reported to SEPA for this site. This confirms that there were no spills from the Emergency Overflow during 2021. There were 20 spill events of raw sewage from the Combined Sewer Overflow at Hawick WWTW and 15 spill events of settled sewage from the storm tank during 2021 (note that sometimes spills occur concurrently at both overflows).
- Further compliance investigations will be carried out at this site by SEPA during 2022/23 to ensure that the overflows and spill monitoring devices operate as required under licence.
- Hawick WWTW discharges to the River Teviot, which is not significantly impacted by pollution relating to wastewater discharges. As reported in the [River Basin Management Plan 2021-2027](#), water quality is High or Good along the River Teviot. For this reason, SEPA is not requiring any major upgrades by Scottish Water for Hawick WwTW under the River Basin Management Plan 2021-2027.
- SEPA has received some recent complaints relating to general sewage litter; however, we are not aware of a persistent issue. If your constituent observes any environmental issues, please report them through the SEPA website:
<https://www2.sepa.org.uk/environmentalevents>

Please shout if you need any more.

Regards

[REDACTED]

[REDACTED]

Public Affairs

Scottish Environment Protection Agency

[REDACTED] [@sepa.org.uk](mailto:[REDACTED]@sepa.org.uk)

[REDACTED]

From: [REDACTED]@gov.scot [REDACTED]@gov.scot>

Sent: 30 May 2022 10:57

To: Ask <Ask@sepa.org.uk>

Cc: [REDACTED]@sepa.org.uk>

Subject: Hawick WwTW, Scottish Borders

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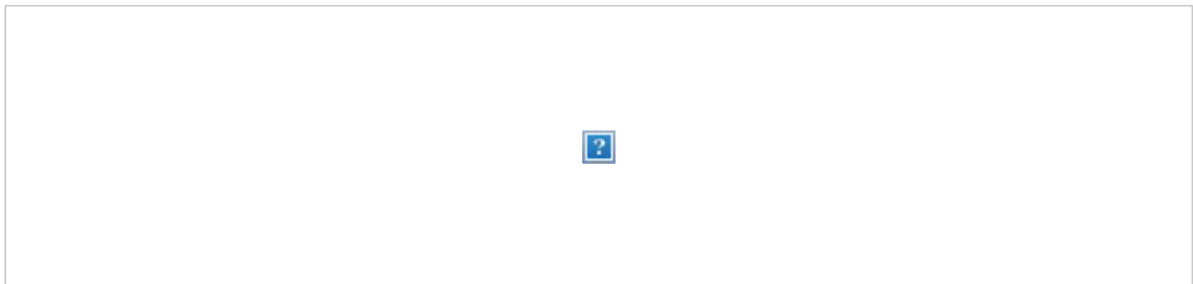
Dear Ask

Please can SEPA provide information regarding the correspondence from John Lamont MSP (attached) in which his constituent is quoted as making the following claim about sewage spills:

“I am writing regarding an article I read in our local paper recently which gave information, under the FOI act, stating that 75% of raw sewage dumps into rivers in Scotland happen here in the Borders. I was shocked and saddened to read this”.

The BBC reported this information in the following article [Hawick site accounts for 75% of Scottish Water sewer overflows - BBC News](#)

The information in shown in the tables in the article doesn't tally with the FOI data recently reported by the Ferret and other online media.



As you will be aware, the BBC also published more detailed FOI Scottish Water Data last year ([Scotland's growing sewage spill problem - BBC News](#)) and even provided an interactive dashboard ([Scotland's Sewage Problem | Tableau Public](#)) so the public could check the data local to them. I note from the table that a lot of the intermittent discharges are SSSO (Settled Storm Sewage Overflow) so they can't even state it's untreated sewage.

I'd appreciate if SEPA could respond to my request by **Tuesday 7 June**.

Thanks

[Redacted]

[Redacted]

(I am currently working from home and can be contacted via email only)



Water Environment Team
Environmental Quality & Resilience Division
Environment & Forestry Directorate
Tel: [Redacted]

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Response

Planned Priority Catchment programme work within the Loch Leven catchment.

When setting phosphorus standards for sewage works discharging into sensitive water bodies such as Loch Leven, SEPA undertakes modelling to ensure that the relevant phosphorus environmental standard is not exceeded. These standards are set by Scottish ministers and are set out in [The Scotland River Basin District \(Standards\) Directions 2014 - gov.scot \(www.gov.scot\)](#)

Scottish Water is currently and historically has maintained compliance with their licensed discharge standards. The EU Wide Urban Waste Water Treatment Directive requires waste water treatment plants to treat Total Phosphorus to 2mg/L. Compliance samples illustrate that the routine discharge from both Kinross and Milnathort waste water treatment works are well within this discharge limits. [Nature.Scot commissioned a Source Apportionment study](#) in 2017 to look at the main sources of Phosphorus within the Loch Leven Catchment. The outcome of the study found that the vast majority (86%) of Phosphorus inputs to the catchment come from diffuse rural sources.

It also highlighted that there was a notable contribution from Kinross WWTWs. Whilst the works themselves are compliant with their licence conditions and routinely perform to a higher standard than stipulated in their licence; it was hypothesised that inputs may be coming from storm discharges due to climate change causing more intense localised rainfall that overwhelms the existing sewerage infrastructure. SEPA have supported a CREW project looking at the impacts of Climate Change on the Loch, which is currently ongoing. SEPA are also in discussions with Scottish Water to assess their storm water infrastructure to determine where improvements need to be made to reduce this impact on the Loch.

Planned Priority Catchment programme work within the Loch Leven catchment.

Loch Leven Farm visits

Priority catchment farm visits started on Monday 7th November in the North and South Queich rivers which feed into Loch Leven, and it is hoped that all farm visits in catchments feeding into Loch Leven will be completed by March 2023. Further farm visit within the Loch Leven catchment will be undertaken during the remainder of 2023.

SEPA's farm visits will assess the pollution potential from agricultural activities undertaken around the farm steading and in the field. SEPA will check for compliance with the diffuse pollution General Binding Rules, assessing activities such as fertiliser and manure application and storage, pesticide storage and application, land cultivation and the keeping of livestock.

If issues are found on a particular farm then the land manager is given a time period of between 6 - 12 months to remediate the issues. All non-compliant farms will be revisited by SEPA staff to assess uptake of redial measures. If no such remediation is undertaken and the farm is still non-compliant SEPA will start gathering evidence for enforcement action.

However, if any serious pollution is found then the timescales for expected remediation will be much shorter.

Current RBMP classification in relation to phosphorus for Loch Leven and objectives aiming reach good status by 2027 or beyond.

Phosphorus is a major cause of impacts on the water quality of Scotland and its River Basin Management Planning classification. As such, phosphorus is an important part of SEPA monitoring.

- [Aquatic Classification | Scottish Environment Protection Agency \(SEPA\)](#)

The impacts of phosphorus on the environment are measured directly by chemical sampling for phosphorus but also indirect ecological impacts that are susceptible to phosphorus such as phytoplankton and macrophytes (plants), invertebrates and fish (animals) sampling.

Loch Leven (WB 100269)

- Poor overall status
- [Water Classification Hub \(sepa.org.uk\)](#)
- Failing for:
 - o Fish Barrier (Poor)
 - o Total Phosphorus (Poor)
 - o Total Nitrogen (Moderate)
 - o Macroinvertebrates (CPET) (Moderate)
 - o Phytoplankton (Moderate)
 - o Macrophytes (Moderate)

It is likely that the ecology (macroinvertebrates, phytoplankton and macrophytes) are impacted by the phosphorus.

Parameter	2020	2019	2018	2017	2016
1: Overall status	Poor	Poor	Poor	Poor	Poor
1-1: Pre-HMWB status	Poor	Poor	Poor	Poor	Poor
1-3: Overall ecology	Poor	Poor	Poor	Poor	Poor
1-3-1: Physico-Chem	Poor	Poor	Poor	Moderate	Moderate
1-3-1-4: Dissolved Oxygen	High	High	High	High	High
1-3-1-5: Total Phosphorus	Poor	Poor	Poor	Moderate	Moderate
1-3-1-6: Salinity	High	High	High	High	High
1-3-1-9-1: Acid Neutralising Capacity	High	High	High	High	High
1-3-1-10: Total Nitrogen	Moderate	Moderate	-	-	-
1-3-2: Biological elements	Poor	Poor	Poor	Poor	Poor
1-3-2-3: Invertebrate animals	Moderate	Moderate	Moderate	Moderate	Moderate
1-3-2-3-2: Macroinvertebrates (acid)	-	-	-	-	-
1-3-2-3-5: Macroinvertebrates (CPET)	Moderate	Moderate	Moderate	Moderate	Moderate
1-3-2-4: Alien species	Good	Good	Good	Good	Good
1-3-2-5: Fish	Poor	Poor	-	-	-
1-3-2-5-1: Fish ecology	Good	Good	-	-	-
1-3-2-5-2: Fish barrier	Poor	Poor	Poor	Poor	Poor
1-3-2-9: Aquatic plants	Moderate	Moderate	Moderate	Moderate	Moderate
1-3-2-9-1: Phytoplankton	Moderate	Moderate	Moderate	Moderate	Moderate
1-3-2-9-1-1: Chlorophyll a	-	-	-	-	-
1-3-2-9-1-2: Cyanobacteria	-	-	-	-	-
1-3-2-9-2: Other aquatic plants	Moderate	Moderate	Moderate	Moderate	Moderate
1-3-2-9-2-1: Macrophytes	Moderate	Moderate	Moderate	Moderate	Moderate
1-3-2-9-2-2: Phytobenthos (diatoms)	-	-	Good	Good	Good
1-3-3: Specific pollutants	Pass	Pass	Pass	Pass	Pass
1-3-3-14: Ammonium	Pass	Pass	Pass	Pass	Pass
1-3-3-17: Manganese	-	-	Pass	Pass	Pass
1-3-4: Hydromorphology	Good	Good	Good	Good	Good
1-3-4-1: Morphology	Good	Good	Good	Good	Good
1-3-4-2: Overall hydrology	High	High	High	High	High
4-1: Water quality	Moderate	Moderate	Moderate	Moderate	Moderate

Current recorded pressures information from RBMP3 causing downgrades.

- [RBMP3 \(sepa.org.uk\)](#)
 - o Fish Barrier 3324 on this waterbody and 3322 (on WB 6301)
 - o Rural diffuse pollution

Impacted condition	What pressures are responsible?	What activity is responsible?	How will the pressure be addressed?	Who will address the pressure?	When will the pressure be addressed?
Access for fish migration	Barrier to fish migration	Hydroelectricity generation	To be determined	SEPA and the business responsible	2021-2027
Access for fish migration	Barrier to fish migration	None (legacy structure)	Regulation	SEPA and voluntary organisations working with businesses and local communities	2021-2027
Water quality	Diffuse source	Rural sources	Priority catchment action	Public bodies and land managers working together	2021-2027
Water quality	Diffuse source	Rural sources	Priority catchment action. Action will be completed by 2027 but it is expected that ecological recovery will take longer.	Public bodies and land managers working together	2021-2027

Target Objective is Moderate by 2027 and Good longer term.

- Fish barrier expected to be actioned by 2027
- Water quality objective is Good longer term due to extended recovery time. Action will be taken but recovery is likely to take longer than RBMP3 timescale of 2027.
 - o [Microsoft Word - ER 3rd cycle nutrients \(sepa.org.uk\)](https://www.sepa.org.uk/micro-words/er-3rd-cycle-nutrients)

Current condition and future objectives

	Current	2027	Long Term
Overall	Poor	Moderate	Good
Water quality	Moderate	Moderate	Good
Water flows and levels	High	High	High
Physical condition	Good	Good	Good
Access for fish migration	Poor	Good	Good
Freedom from invasive species	Good	Good	Good

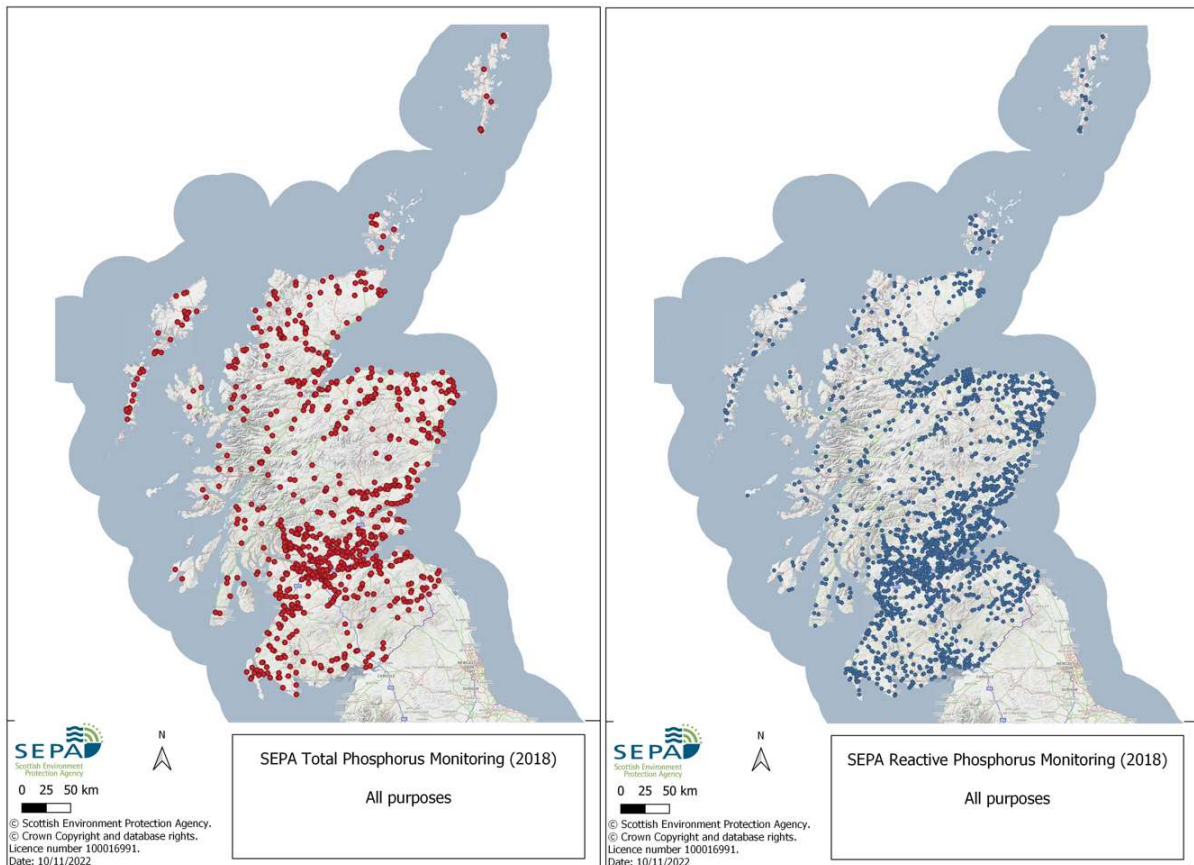
- SEPA monitoring of phosphorus across Scotland for RBMP and how standards are set for sewage works discharges into sensitive waterbodies such as Loch Leven

Monitoring – EQ

SEPA monitoring has been impacted by the Covid-19 pandemic. In addition to this SEPA had a cyber-attack at the end of 2020 which impacted many of our systems and datasets. The latest full dataset is 2018 which represents a typical sampling year. SEPA is currently building back its monitoring network.

In 2018 SEPA carried out the following sampling for phosphorus.

Determinand	Analysis	No. Samples	No. Locations
Total Phosphorus	TP as P	10,607	1007
Reactive Phosphorus	RP as P	21,873	2935
Total		32,480	3,942



The numbers above include all phosphorus sampling across Scotland as requested. Generally total phosphorus (TP as P) is recorded for lochs and reactive phosphorus (RP as P) is recorded for Lochs – however in some cases both can be sampled.

- For more information [The Scotland River Basin District \(Standards\) Directions 2014 - gov.scot](http://www.gov.scot) (www.gov.scot)

Please note that there are different sampling regimes. For example, RBMP operational and surveillance monitoring is used to determine the status of the water environment and be used to classify the waterbodies as part of the RBMP Classification. Investigative monitoring is used for more specific investigations and will not be used as part of RBMP Classification.

SEPA's role in planning in relation to minimising the impact of phosphorus and the pressures of housing development on Loch Leven

SEPA engaged with Perth and Kinross Council (PKC) on the Local Development Plan (LDP) which was adopted in 2019, including with regards to Policy 46: Loch Leven Catchment Area. This policy states that any new development must not cause a net increase in the amount of phosphorus which currently arises from the combined total from sewage treatment works and private sewage works ("septic tanks").

To ensure that new developments don't add to the burden of phosphorus going into the loch, any new development has to have a net positive impact on the amount of phosphorus – a new development will only be approved if it removes 125% of the phosphorus released from their development (i.e. if a new development were to cause an increase of 100 units of phosphorus, work would have to be undertaken by the developer to remove 125 units of phosphorus elsewhere, e.g. by upgrading a neighbour's septic tank).

SEPA was also involved in the formation of PKC's associated supplementary guidance - [Planning Guidance - Loch Leven SPA, the Dunkeld-Blairgowrie Lochs SAC and the River Tay SAC](#), which was updated in February 2022.

SEPA supports the implementation of the LDP policy and guidance at the development management stage by responding to consultations from PKC on all detailed planning applications proposing private waste water drainage within the Loch Leven catchment. SEPA reviews the submitted phosphorous mitigation calculations and advise PKC as to the whether the 125% mitigation requirement has been met. Although SEPA can advise PKC on the suitability of proposed mitigation, PKC are the Local Planning Authority, and as such make the final decisions on whether to approve the planning application or otherwise.

SEPA will continue to engage with PKC on the development plan process with regards to Loch Leven and other statutory interests when PKC start work on the next iteration of their Local Development Plan following the publication of National Planning Framework 4.

Annex 1 – Ask to Ask from [redacted]:

Dear Ask

Please can SEPA provide information to support a response from the Minister to the attached letter.

In particular, please can you cover the following:

- Summary of historic catchment work to address levels of phosphorus on Loch Leven and current/ planned activity
- Current RBMP classification in relation to phosphorus for Loch Leven and objectives aiming reach good status by 2027 or beyond.
- SEPA monitoring of phosphorus across Scotland for RBMP and how standards are set for sewage works discharges into sensitive waterbodies such as Loch Leven
- Planned Priority Catchment programme work within the Loch Leven catchment.
- SEPA's role in planning in relation to minimising the impact of phosphorus and the pressures of housing development on Loch Leven

I'd appreciate a response by **Friday 25 November 2022**.

Regards

[redacted]

Annex 2 – letter:

scottish.ministers@gov.scot

To Mairi McAllan MSP

Minister for Environment and Land Reform

Loch Leven Kinross-shire, A dying Loch?

We know there is concern about many Lochs in Scotland and the impact of climate change and pollution from phosphates. In recent years it has become

more and more noticeable that the chemical composition of the water in Loch Leven is causing more and more green algae events.

I was disturbed to hear reports of the recent debate in the Scottish Parliament where you appear to have indicated that flushing events from the Kinross treatment plant sewage are not occurring. You have been misinformed! I suspect that what is happening is within current licence standards. That's maybe what you have been told, but that is not the same as no flushing.

We are calling for more Government led attention to the issue and ask for action to arrest the increase in phosphates getting into Loch Leven in particular but more generally into all our inland waterbodies.

Of particular concern is the growing frequency of flushing events of sewage during heavy rainfall. Whilst we accept that in extremis these events are unavoidable in the immediate future. However, we are concerned that this is becoming more frequent due to climate change, and when they occur, they have more phosphate-rich material due to housing development.

We feel that:-

- a) the classification for determining priority upgrades of treatment works fails to take into account environmental impacts on our Lochs and
- b) relies on the measurement of waste that can be seen – which of course doesn't occur when faecal matter is flushed directly into a loch as it disperses, gets gathered into the lochside flora out of sight from the bank or disintegrates.

We believe SEPA should be taking a more active role in arguing against new developments in these sensitive catchment areas and would welcome your views on this matter.

Indeed I understand that the standards set for discharges into our Lochs from both farming and human waste have been relaxed and are far lower than many European Countries that we would want to be compared with.

We recognise that any solution will be expensive and require a lot of planning. We would ask for consideration to be given to a moratorium on new housing development in the most affected areas until a solution can be put in place.

We appreciate that planning is a matter where in terms of implementation it is left to Councils, but there is a role for Government guidance and direction to

protect the environment. We would anticipate that raising standards for discharges from waste treatment plants into vulnerable water bodies would be in the remit of You, as a minister, and ask for urgent consideration of such a move.

In terms of housing development's contribution to the issue despite the Local Development Plan allocating 10% less development to the Loch Leven catchment area than in the rest of Perth and Kinross, we have witnessed over 30% more house builds than that allocated to the area and developer pressure continues. This is causing evermore strain on our Victorian sewage system and more phosphate-heavy mass to be present when flushing occurs.

This issue has come into particular focus with plans from a developer for a further 180 houses in Kinross. The background to this long-running saga is that a development that has twice been rejected by the Reporter, which in a rational world should be enough to deter any developer from further approaching the Council for planning permission. Alas not, neither does the fact that the site is "in the Countryside" where stricter rules apply. If this site goes ahead I estimate that the percentage increase in waste matter discharged during flushing events will add 5% to the current volume.

The last point I would ask you to seek answers on is the review and monitoring of progress on the discharge of phosphates from farming activity. I know our local farmers would not wish to harm the Loch but for example, one way to reduce the flow of phosphates is prompt ploughing after the potato harvest which increases the soil retention of water and hence the phosphates. The current run of wet weather has made the fields too wet to plough so with the best will in the world the discharge from farming will be higher than desired – as a result of changing weather patterns.

None of us think there is an easy solution to this issue, but we do want our Local Loch in particular to survive and thrive. It has the highest levels of protection, rightly restricting many waterborne activities but the plumes now make it unsafe for humans and pets to even enter the water for large parts of the year and it's getting worse year by year.

Yours Sincerely

On behalf of Kinross Action Group

From: Ask
To: [REDACTED]
Cc: [REDACTED]
Subject: OME ID:3054 - Alex Cole Hamilton MSP Parliamentary motion re sewage spills
Date: 13 October 2022 13:45:48
Attachments: [image001.png](#)

OFFICIAL

Dear [REDACTED]

Thank you for your enquiry please see our response below.

There are over 3,667 Combined Sewer Overflows (CSOs) within the 50,000km of sewer network in Scotland (equivalent of one for every 15km). These are designed to spill during heavy rainfall to prevent sewer flooding of properties. However, an increasing number of CSOs spill with high frequency due to the following causes:

- Hydraulic overloading from increased flows since the sewer was originally designed. This can be caused by:
 - the connection of additional impermeable surfaces to the sewerage network (housing/business growth and when permeable areas are paved over);
 - increases in overall rainfall and rainfall intensity due to climate change;
 - network maintenance issues (e.g. siltation and infiltration).
- Blockages (over 35,000/year) caused by inappropriately flushed items that customers dispose to sewer (e.g. wet wipes or cooking oils) and from sewer collapses and deterioration of the sewer system.

In December 2021, Scottish Water published a route map for improving urban waters. This sets out actions required by Scottish Water, as a public body and responsible authority for River Basin Management Planning, as well as significant work needed with other partners to deliver long term improvements.

As part of the route map for improving urban waters (<https://www.scottishwater.co.uk/About-Us/News-and-Views/2021/12/211221-Urban-Waters-Routemap>) Scottish Water has committed to install approximately 1,000 monitors on network and treatment work CSOs discharging to the highest priority waters. This will improve the understanding of how the CSOs are operating and will provide transparent information on their performance. Overall Scottish Water is currently responsible for 3,667 combined sewer overflows of which 340 have a monitor. Specifically, to bathing waters, there are 387 CSOs discharging within 2km of a bathing beach and 118 have a monitor installed. Of this figure 59 were recently installed within 1km of bathing waters.

As part of the route map for improving urban waters a further 246 monitors will be installed at assets within 2km of bathing waters and a further 754 will be prioritised, initially focusing on bathing waters and shellfish waters and their assets within 2km of the designations. The timescale for the installation of all 1000 monitors is December 2024. This will give an overall monitor total of 1340.

In addition to the information above, 26 CSOs have been prioritised for investment under

RBMP3 due to water quality needs. These cover 17 waterbodies and five main catchments (Glasgow, River Almond, Upper Clyde, Water of Leith & Lockerbie)

Set out below is the approach to monitoring, classifying, and using data used to protect the public by SEPA and partner organisations at designated bathing waters.

Our bathing water quality monitoring results during 2022 are published on SEPA's website (<https://www2.sepa.org.uk/bathingwaters/Locations.aspx>) throughout the Bathing Season which runs from 1 June to 15 September. In Scotland, the general water quality condition for each bathing water is described by a classification statement – excellent, good, sufficient, and poor – based on four years of monitoring data. Classifications are calculated at the end of the bathing water season and apply to each bathing water for the duration of the following season.

SEPA calculates these classifications, based on percentiles, according to the Bathing Waters (Scotland) Regulations 2008. These regulations are underpinned by work of the World Health Organisation. Using this methodology, in 2022, 86 of Scotland's 87 designated bathing waters (99%) met the sufficient or better classification.

Once the current bathing water season and sampling are finished, we will calculate classifications to be displayed in 2023.

Heavy rain can cause short term fluctuations in water quality at many bathing waters. As such, bathing is not advised during, or one to three days after, heavy rainfall. At the most impacted bathing waters we make daily water quality predictions during the bathing season and display these on our website and electronic beach signs.

SEPA continues to work with partners to raise or maintain the quality of bathing waters throughout the country for the benefit of the communities and visitors who use them.

Please note: *No comment is made by SEPA on the statistics quoted in the motion regarding bathing waters. The numbers presented were not produced by SEPA and do not in our opinion reflect how advice on water quality is provided to the public during the bathing season e.g., through signage because of wet weather or a pollution incident.*

If we can be of any further help, please let us know.

Kind regards



OME Administrator
Scottish Environment Protection Agency (SEPA)

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Registered office: Strathallan House, Castle Business Park, Stirling FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist.

Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

OFFICIAL

From: [REDACTED]@gov.scot>
Sent: 07 October 2022 13:32
To: [REDACTED]@sepa.org.uk>
Cc: Ask <Ask@sepa.org.uk>, [REDACTED]@SEPA.org.uk>; [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@gov.scot; [REDACTED]@sepa.org.uk>
Subject: Alex Cole Hamilton MSP Parliamentary motion re sewage spills

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED]

I'd like to make you aware of the Alex Cole Hamilton motion regarding sewage spills due to be taken in the Chamber on Wednesday, October 26, 2022, as follows:

That the Parliament notes the view that the natural environment deserves the highest possible protection; further notes the reports in The Ferret that untreated human waste was discharged into Scotland's waters more than 10,000 times in 2021, including at beauty spots such as the River Almond, which passes through the Edinburgh Western constituency; considers that the true figure is likely to be much higher due to monitoring only being required, it understands, at 3% of sewage release points; understands that Scottish Environmental Protection Agency figures show that 49 of the 87 designated bathing waters around Scotland recorded levels of the faecal bacteria, E. coli, and intestinal enterococci during summer 2022 that represented a danger to the health of swimmers, surfers, paddlers and wildlife; further understands that high concentrations of such bacteria can cause stomach, ear, nose and throat infections, and notes the calls from campaigners for targets to be set to reduce discharges, for enhanced monitoring to be backed up by transparent reporting, and for the acceleration of measures to upgrade sewage systems and tackle overflows.
([S6M-06148](#) | [Scottish Parliament Website](#))

In drafting briefing for the Minister I'd appreciate detailed information from SEPA in relation on the matters underlined above. I would also like information on CSO

monitoring at bathing waters across Scotland ie what percentage already have them installed and when the rest are prioritised to be completed. It would be also useful to indicate the total length and/ or number of waterbodies impacted by the 27 CSOs prioritised for improvements due to water quality impacts through RBMP to put them into context. It's really about setting out what the current high level position is and when improvement is going to be achieved.

Current SEPA compliance assessment results on Scottish Water's network licence's would also be useful.

In relation to dangers to health I'm not aware of any studies that we can reference. I noted the PHS statement, below, in relation to the River Almond group Q&A.

Public Health Scotland has not produced public health guidance relating to wild swimming. However, it is aware of the work that SEPA carries out in relation to designated bathing waters in Scotland, as well as guidance produced by the Environment Agency and Public Health England (now UK Health Security Agency) relating to open water swimming.

The UK HSA advice is also applicable to open water swimming in Scotland. As PHS remobilises its services following the COVID-19 response, we will consider priority work areas relating to Environmental Public Health, and this topic will be included within these considerations alongside other priority areas. Queries regarding specific bathing water applications or incidents are managed at local level by either the local authority or the local Health Protection Team.

A lot of the other information relates to Scottish Water's Improving Urban Waters Routemap and I expect the Water Industry Policy Team and Scottish Water to provide that information unless there was something in particular you'd like to flag.

I'd appreciate a response by **Friday 14 October**.

Thanks

[Redacted]

[Redacted]

[Redacted]

(I am currently working from home and can be contacted via email only)



Water Environment Team
Environmental Quality & Resilience Division
Environment & Forestry Directorate
Tel: [Redacted]

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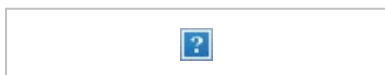
From: [REDACTED]
To: [Ask](#)
Subject: RE: PQs - S6W-15160 - Deadline Date 2rd March
Date: 06 March 2023 10:26:00
Attachments: [image001.jpg](#)

Thank you [REDACTED]

Many thanks for your efforts

Kind regards

[REDACTED]



[REDACTED]

[REDACTED]

Water Environment Team, Environmental Quality & Circular Economy Division
Environment & Forestry Directorate
Scottish Government
Tel: [REDACTED]
E-mail: [REDACTED] [@gov.scot](#)

From: Ask <Ask@sepa.org.uk>
Sent: 06 March 2023 09:23
To: [REDACTED]@gov.scot>; Ask <Ask@sepa.org.uk>
Cc: [REDACTED]@gov.scot>; [REDACTED]@gov.scot>
Subject: RE: PQs - S6W-15160 - Deadline Date 2rd March

OFFICIAL

Hi [REDACTED]

Thank you for this and apologies for the slight delay, please see our response below.

The networks of public sewers, known as sewer networks, collect, store and convey sewage and surface water within and from a drainage area, each of which cover extensive areas of Scotland. The networks include storage facilities, pumping stations, overflows (which act to alleviate the impacts of flooding) as well as a complex arrangement of pipework which is primarily underground.

Over the past 20 years, SEPA has worked with Scottish Water to deliver significant improvements to the water environment through upgrades to the sewage collection and treatment systems. Between 2010 and 2021, SEPA required Scottish Water to improve 279 sewer overflows and 104 wastewater treatment works, which were causing significant pollution. As a result, water quality is now at its highest level to date, with 87% of Scotland's waters having good or better water quality, as set out in the River Basin Management Plan that SEPA published in December

2021 ([The River Basin Management Plan 2021-27](#)).

In 2021, SEPA wrote to Scottish Water setting out our expectations and timetable for a route map to improve urban waters as part of the actions required in the River Basin Management Plan 2021-2027, further information is available on our webpage about [Improving Urban Waters](#). In December 2021, Scottish Water published a [route map for improving urban waters](#). This sets out actions required by Scottish Water, as a public body and responsible authority for River Basin Management Planning, as well as significant work needed with other partners to deliver long term improvements.

As part of Scottish Waters Improving Urban Waters route map Scottish Water has committed to installing monitoring on networks and treatment work combined sewer overflows (CSOs) discharging to the highest priority waters (including all designated shellfish and bathing waters) representing approximately 1,000 CSOs. This will improve our understanding of how these are operating and provide transparent information on their performance.

On 24 December 2020, SEPA was subject to a serious and complex cyber-attack, displaying significant stealth and malicious sophistication, which significantly impacted our organisation, our staff, our public and private partners, and the communities who rely on our services.

Although recovering, SEPA's previous data systems were lost and there are limitations to the information we can provide. We have endeavoured to answer the questions below as far as possible.

When the last inspection of each of the 345 SEPA-licensed and regulated sewer networks in Scotland was carried out; whether any were found not to be compliant with their licence conditions at their last inspection,

The inspection of sewer networks by SEPA can be the result of both planned work and in response to a notification of an issue by a member of the public or by Scottish Water. These inspections are normally targeted to specific areas, such as a pumping station and overflows in the local area which are in themselves part of a much larger sewer network.

Non-compliance with an element of a network was identified with 78 licences at the time of inspection over the period June 2021 to date.

It should be noted that, by their nature, compliance with sewer networks is dynamic and non-compliance may be short-lived. For example, at time of writing SEPA is not aware of any current, ongoing non-compliance with sewer network licences.

(a) for what reason,

SEPA sets licence conditions with respect to various aspects of sewer network operation. Non-compliance with licence conditions included the following areas:

- Blockage of downstream sewer
- Sewage debris visible as a result of a discharge
- Significant visible impact on receiving waters due to the presence of oil or grease
- Significant deposition of sewage solids

It should be noted that a key function of the overflows within the sewer system is to alleviate the risk of flooding and therefore, not all spills are considered non-compliance with the licence conditions.

(b) whether any work was carried out on them and

Scottish Water investigate reports of non-compliance, which can involve CCTV surveys, and undertake work to rectify issues identified such as clearing of tree roots, fats oils and grease, identifying and deterring illegal disposal of wastes and cross connections, and clearing watercourses and the surrounding areas.

As above, between 2010 and 2021, SEPA required Scottish Water to improve 279 sewer overflows and 104 wastewater treatment works, which were causing significant pollution. As a result, water quality is now at its highest level to date, with 87% of Scotland's waters having good or better water quality.

Scottish Water's [route map for improving urban waters](#) sets out actions required by Scottish Water, as well as significant work needed with other partners, to deliver long term improvements. The route map signals Scottish Water's prioritised investment programme in this area.

(c) whether it will provide a list of any non-compliant networks.

As above, by their nature, sewer networks are dynamic and non-compliance may be short-lived. At the time of writing SEPA is not aware of any current, non-compliance with sewer network licences.

However, it is recognised that improvements are required to sewer networks across the country and prioritised actions and approach are set out in Scottish Water's [route map for improving urban waters.](#)

As a result of the cyber-attack, SEPA has not operated a formal Compliance Assessment Scheme since 2019. As we redevelop our approach to assessing and publishing compliance information, our proposals will consider how to make compliance more visible in dynamic situations such as

these.

I hope this information is helpful but if you need anything else, please let us know.

Kind regards

OME Administrator
Scottish Environment Protection Agency (SEPA)

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Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk.

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

OFFICIAL

From: [REDACTED] <[REDACTED]@gov.scot>
Sent: 06 March 2023 08:29
To: Ask <Ask@sepa.org.uk>
Cc: [REDACTED] <[REDACTED]@gov.scot>; [REDACTED] <[REDACTED]@gov.scot>
Subject: RE: PQs - S6W-15160 - Deadline Date 2rd March

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Hi [REDACTED]
I hope you had a lovely weekend!

Thanks for letting me know about the slight delay but I would appreciate if you can put this as a priority this morning.

Kind regards

[REDACTED]



[Redacted]
[Redacted]

Water Environment Team, Environmental Quality & Circular Economy Division
Environment & Forestry Directorate
Scottish Government
Tel: [Redacted]
E-mail: [Redacted]@gov.scot

From: Ask <Ask@sepa.org.uk>
Sent: 03 March 2023 17:01
To: [Redacted]@gov.scot; Ask <Ask@sepa.org.uk>
Subject: RE: PQs - S6W-15160 - Deadline Date 2rd March

OFFICIAL

Hi [Redacted]

I'm just off a call with colleagues on this enquiry.

We should have the final sign off in the next few hours in order for me to send on first thing Monday morning.

Have a great weekend when the time comes.

[Redacted]

OFFICIAL

From: [Redacted]@gov.scot
Sent: 20 February 2023 10:24
To: Ask <Ask@sepa.org.uk>
Subject: RE: PQs - S6W-15160 - Deadline Date 2rd March

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Typing error [Redacted]
3rd March is the correct

Kind regards

[Redacted]



[REDACTED]
[REDACTED]
Water Environment Team, Environmental Quality & Circular Economy Division
Environment & Forestry Directorate
Scottish Government

Tel: [REDACTED]
[REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot)

From: Ask <Ask@sepa.org.uk>
Sent: 20 February 2023 10:22
To: [REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: RE: PQs - S6W-15160 - Deadline Date 2rd March

OFFICIAL

Thanks [REDACTED] I'll log now.

Is our deadline the 2nd March and yours the 3rd?

Cheers!

[REDACTED]

OFFICIAL

From: [REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot)>
Sent: 20 February 2023 10:17
To: Ask <Ask@sepa.org.uk>
Cc: [REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot); [REDACTED] [@gov.scot](mailto:[REDACTED]@gov.scot)
Subject: FW: PQs - S6W-15160 - Deadline Date 2rd March

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Dear Ask,

Grateful if you can provide information for the following PQ.

S6W-15160 Alex Cole-Hamilton: *To ask the Scottish Government when the last inspection of each of the 345 SEPA-licensed and regulated sewer networks in Scotland was carried out; whether any were found not to be compliant with their licence conditions at their last inspection, and, if so, (a) for what reason, (b) whether any work was carried out on them and (c) whether it will provide a list of any non-compliant networks.*

I would be grateful for your response by **(3 March Private Office deadline)**.

Kind regards

[Redacted]



[Redacted]

[Redacted]

Water Environment Team, Environmental Quality & Circular Economy Division
Environment & Forestry Directorate
Scottish Government

Tel: [Redacted]

[Redacted] [@gov.scot](mailto:[Redacted]@gov.scot)

Improving Urban Waters Route Map – May 2022 Update

Activity Briefing

A breakdown of activities (see Appendix 1) to support delivery of the commitments set out in the improving Urban Waters (IUW) Route Map has been developed. Building on those activities, this document sets out in more detail how Scottish Water and SEPA are proposing to deliver together to meet commitments. Table 1 below shows that we are currently on track and making good progress in all areas.

	Progress Assessment	2022 Activity	Status	2023 Activity	Status	2024 Activity	Status	2027 Target	Status
Water Quality (RBMP3 Commitments)	On Track	Promote Projects	G	Develop Solutions	G	Develop Solutions	G	Deliver 27 CSO and ** WwTW Solutions	G
Monitoring	On track / Ahead of Schedule	Prioritise EDM locations	G	Install c 300 Monitors	G	Install c 600 monitors	G	Identify further monitoring needs and deliver further monitors	G
		Publish 2022 Flow and Event return in Dec 2022	G	Publish all Monitor spill data in Dec 2023	G	Publish monitor spill data in real time. Provide alerts to water users	G		
		Identify intelligent networks and sensor capability	G	Understand capability and refine	G	Deliver Intelligent networks in 3 catchments	G	Identify further intelligent networks and roll out capability	G
Remove Sewer Related Debris	On Track	Prioritise SRD UIDs and promote projects	G	Develop Solutions for 85 HP UIDs	G	Develop Solutions for 85 HP UIDs	G	Agree timelines and deliver solutions for 85 HP UIDs	G
		Develop and roll out customer campaign	G						
		Support source control initiatives	G	Support source control initiatives	G	Support source control initiatives	G	Support source control initiatives	G
		Microplastics and AMR research	G	Microplastics and AMR research	G	Microplastics and AMR research	G		
		Publish UID prioritisation matrix	G						
Reduce Spills	On Track	Identify solutions and opportunities	G	Identify solutions and opportunities	G	Identify solutions and opportunities	G		
		Work across all Stakeholder	G	Work across all Stakeholder	G	Work across all Stakeholder	G		
Customer, Community and Business Engagement	On track / Ahead of Schedule	Develop proposals and deliver 2 Lighthouse Projects	G						

Table 1 – IUW Progress Dashboard

Section 1. UID Improvements (Theme 1, WQ & Theme 4, Sewage Debris)

Scottish Water

As of May 2022, Scottish Water has promoted 71 UID needs into the development phase of work based upon prioritisation work done previously (late 2021). A further 5 RBMP3 water quality UID needs are currently being promoted. Once this activity is complete, all RBMP water quality needs (both UIDs and WwTWs) will have been promoted and development work will be ongoing.

A further 37 still require promotion, giving a total of 108 high priority UID needs (27 RBMP3 WQ needs). The total number of high priority needs has been reduced by 1 since the March update, due to confirmation that one had been duplicated, which has now been removed.

The focus is now on screening the remaining high priority needs to determine which can move quickly to detailed development and which will require planning consideration of system-wide needs (other hydraulically linked, lower priority UIDs, flooding needs or development constraints). These needs have been captured spatially and a screening approach has been developed to support relatively rapid decision-making.

Delivery timescales are understood with preferred solutions required by 2024 to support delivery of RMBP3 WQ UID improvements by 2027 and to move high priority aesthetic UIDs into delivery ASAP when funding is confirmed.

A UID prioritisation list will be maintained. The remaining UIDs will be categorised according to the UID prioritisation approach detailed in the UID Management Approach.

Where potential needs emerge, aesthetic or water quality studies will be raised as detailed in the Wastewater Studies Management Approach.

SEPA

For water quality, SEPA will be increasing monitoring in 2022 with a view to carrying out classification in 2023. From 2023, this may lead to SEPA identifying SW assets as potential pressures, which may require promotion of studies to confirm any new needs again covered by the WW Studies Management Approach.

SEPA will continue ongoing review with SW of new information arising (eg EPIs or complaints) to determine where new aesthetic surveys are required.

Section 2. Monitoring (Theme 2)

Scottish Water

The route map requires 1,000 new monitors (IUW1000) to be installed over the next 3 years and data made available internally and externally. This is a significant delivery commitment and work is considered in 4 key stages:

1. Identify monitoring locations and types of monitor
2. Identify delivery scope (eg access, power, telemetry, traffic management)
3. Develop model and deliver (max delivery rate c 50 monitors/month)
4. Develop and deliver data management system, analytics and reporting capability (link to compliance, decision-making and improved transparency)

Scottish Water is currently undertaking a first pass of where monitors should be installed focussing on considerations such as; proximity to sensitive areas, UID status, licensed monitoring requirements (SNL and WwTW), hydraulic model verification points, flooding impacts, community focus, predicted spill frequency etc. Once a prioritised list is established, this will be shared with SEPA for finalisation.

A tranche of 246 assets identified through IR18 work are to be considered the first programme of IUW1000 monitors to be delivered. These have already been identified as a priority and funding was not allocated to deliver these in the SR15 programme. Delivery activity (survey and other planning work) for this tranche has been moved to the new delivery model that has been developed with consultancy support.

The 2022 (2021 data) Flow and Event data return was completed in January 2022. The route map commits to making this data publicly available during 2022 with commentary where the cause of spills is known.

We are developing our wastewater Intelligent Network capability and have completed the majority of sensor installations at CSOs and at other priority locations in our 4 pilot catchments as shown in figure 1 below. Data is being received and analysed and preliminary reporting dashboards are being created. There have been some early successes in capturing situational data that has warned of the formation of sewer blockages and this has allowed early interventions (cleaning) to prevent service issues.

Install Progress

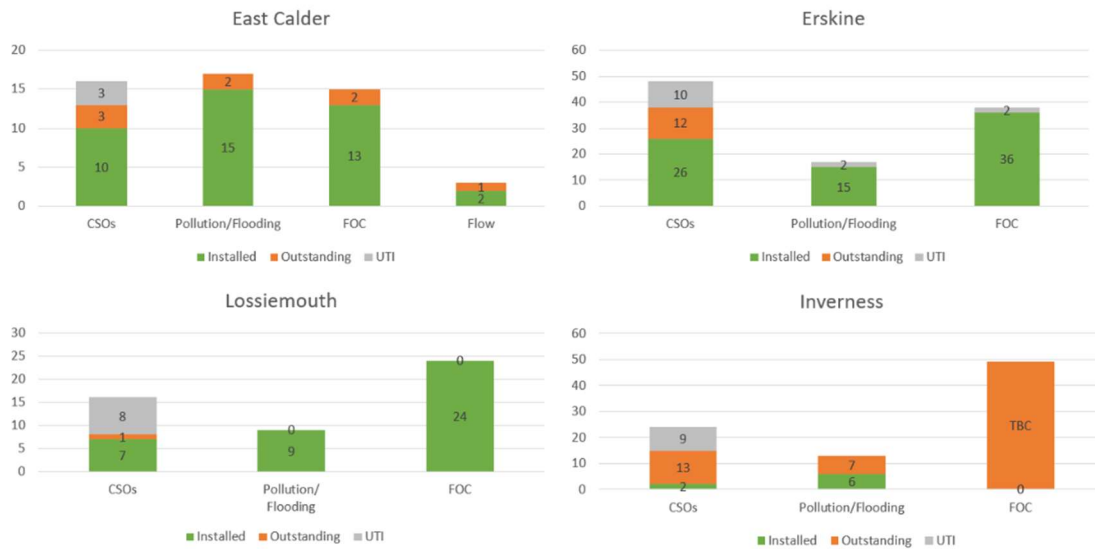


Figure 1 – WW intelligent Network Sensor installation

SEPA

SEPA will review the proposed prioritisation criteria, provide data where available to support the prioritisation of event duration monitor locations and review the prioritised list.

SEPA will engage with SW on which spill data reporting arrangements will be most useful to SEPA and other users.

Section 3. Source Control (Theme 3 / Theme 7, Engagement)

Scottish Water

SW has published the joint UID prioritisation methodology and the current list of high priority UID needs on its website at the following link [Prioritisation of Sewer Overflows in Scotland - Scottish Water](#)

SW's new customer education campaign, 'Nature Calls' launched formally in late February and has been well received, with over 100 news articles, and 100 million social media impressions. For the first time Scottish Water utilised 'influencers' to share the 'Nature Calls' message.

The campaign calls for a change in behaviour in terms of flushing inappropriate items which cause sewer blockages and debris in the environment and will also look to lobby for support in calling for a ban on wipes which do not meet 'Fine to Flush' standards.

The scope of the first 'Lighthouse Project' in the River Almond catchment has been further developed at a consultant-facilitated inception meeting with representatives from SW, SEPA and the HydroNation Chair. We plan to run a 4-week design sprint with an estimated start date of 23rd May and are keen to have representation from the Almond Stakeholder Group (MP / MSP led), in order to gain views on outcome and potential level of customer participation (eg waterbutts) and citizen science (ie inputting observations to assess/consult feedback). It is anticipated that the overall

outcome will be a place (physical and virtual) for the community to use that gives them connection to the river, improving wellbeing and engagement.

SEPA

SEPA will signpost to the published UID prioritisation method and will amplify the education campaign through our existing communication channels.

SEPA is currently working on an information sheet about AMR, which links closely to the AESS (AMR in the Environment in Scotland) stakeholder group work. We will plan a similar task for 2022/23 relating to microplastics. We have responded to the Marine Litter Strategy consultation.

SEPA is developing a communications plan for the stakeholder group engagement. This is likely to be late autumn 2022. We are reviewing what resource SEPA has available to scope and support the Almond Lighthouse project.

Section 4: Managing Surface Water (Theme 6)

Scottish Water

Scottish Water is developing approaches to the management of surface water at city, neighbourhood, and project scale. These are being developed in partnership with SEPA and Local Authorities, examples include:

- SGA in Aberdeen developing the strategic modelling and planning approach required at a city scale to understand the strategic infrastructure that would be required to manage surface water. With the objective of reducing the risk and impact of surface water flooding and improving the performance of the sewer network to reduce sewer flooding and CSO spills
- Demonstrably Different projects in Edinburgh, working with SEPA & City of Edinburgh Council to jointly develop and deliver place-led, integrated drainage and surface water management. Focusing on developing and testing the practical implementation and policy approaches that could be utilised to deliver on the ground. Outcomes are focusing on reducing flood risk, and approaches could be scaled to other areas to reduce CSO spills in the future
- Developing a GIS-based surface water opportunity mapping tool to identify key disconnection opportunities within catchments and understand the potential these opportunities can make to the sewer network performance. Once refined, this tool could be utilised to prioritise areas where SWM interventions could play a role in delivering UID improvements in both the short and longer term
- Developing a range of SWM guidance to be taken account of during the development of Flooding & UID projects to encourage SWM interventions through all capital projects

SEPA

In compiling SEPA's recent response to the NPF4 draft we liaised with Scottish Water. Our response highlights that within the context of climate change and increasing pressures on our water management infrastructure, NPF4 needs to provide a policy framework that supports demonstrably different approaches to managing our water environment. This is currently missing from the draft and we have emphasised that whilst such approaches present challenges they also present significant opportunities to improve the quality of places and in doing so support the delivery of wider NPF4 outcomes. The need for systemic change in how we plan for and deliver BGI through integrated place

placed approaches is highlighted as key in delivering such demonstrably different approaches. BGI must be recognised as 'essential infrastructure' as part of an integrated infrastructure first approach if this is to be achieved and we have suggested this in our response.

To support the delivery of the above we recommend that local authorities undertake strategic BGI mapping as part of local development plan evidence gathering (including environmental and asset capacity as well as RBMP, FRMP, DWMPs and the WRMP) to help inform an integrated place-based approach to future fitting water management infrastructure.

Section 5: Policy / Regulation (Theme 5 / Theme 8)

SEPA

Under the Compliance Verification Plan for 2022 onwards, SEPA is proposing specific audits of WwTW and SNL licence requirements relating to system hydraulics, including working with SW to develop a method/process for identifying which WwTWs are spilling before reaching licensed PFF. SEPA will work with SW to develop a process to ensure ongoing proactive review of spill frequencies using the SOAF criteria.

SEPA intends to develop a statement explaining the regulatory approach for sewer networks and to publish this on our website in 2022.

Section 6: Governance

Joint working map will be coordinated through the Joint Development Group, with progress reports submitted to quarterly NLG/Directors liaison and any issues escalated as necessary.

Scottish Water

Scottish Water continues to work through governance design for each of the workstreams required to support IUW commitments.

SEPA

Governance for tasks within SEPA is provided by the SEPA RBMP delivery group which reports to SEPA's AMT. Quarterly progress reports and significant issues will be escalated to this group. Specific papers will be submitted to SEPA's Regulatory Support Group for regulatory decisions as required and/or escalated to AMT.

Appendix 1 –Activity Plan

	Task	Lead	Start	End
1 Water quality	Develop confirmed RBMP3 measures	SW	2020	Dec 2024
	Identify any new needs	SEPA	Ongoing	Ongoing
2 Monitoring	Prioritise and deliver spill monitoring locations	SW	2020	Dec 2024
	Produce annual spill report	SW	Jun 2022	Dec 2022
	Near real time spill reporting	SW	Sep 2022	Dec 2024
	Pilot Intelligent networks	SW	Jan 2022	Dec 2024
3 Source control	Support SG to consider single use plastic policy	Joint	Apr 2022	TBC
	National campaign on wipes	SW	Feb 2022	TBC
	Evidence on microplastics	Joint	2021	Dec 2022
	Evidence on AMR	Joint	2020	Dec 2022
4 Remove debris	Aesthetic studies and prioritisation	SW	2018	Ongoing
	Develop High priority aesthetics solutions	SW	2020	2024
5 Regulate spills	Develop WWTW PFF investigation process	SEPA	Sep 2022	Mar 2023
	Develop spill trigger review process	SEPA	Jun 2022	Dec 2022
	Audit compliance with licences	SEPA	Apr 2023	Mar 2024
6 Manage surface water	Push for implementation of Water resilient places/NPF4	Joint	Feb 2022	Mar 2023
	Complete SGA Aberdeen	Joint	2019	Jun 2022
	Deliver DD projects in Edinburgh	SW	2019	Ongoing
	Systematise BGI structure plan/approaches nationally	Joint	2023	2024
7 Engagement	Initiate stakeholder group	SEPA	Sep 2022	Sep 2023
	Agree preferred platforms for providing geographic spills data to public (eg SAS app)	SW	Jun 2022	Sep 2022
	Review/implement use of spills in BW signage	SEPA	Dec 2022	TBC
	Almond - community wipes and attenuation	Joint	Mar 2022	Dec 2024
	TBC - 2nd Lighthouse project	TBC	2023	2024
8 Policy/Regulation	Clarify current regulatory approach to public	SEPA	May 2022	Aug 2022
	Review current regulatory approach and policies	SEPA	Sep 2022	Jun 2023
	Review regulatory position with current approach licences/compliance with current	SEPA	May 2022	Aug 2022
	Position on wild swimming/signage at non-BW	SEPA	Jun 2022	Mar 2023
9 Governance	Bilateral progress reports to NLG/Directors	Joint	-	Quarterly
	SW annual report to Ministers	SW	-	Annual

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Surfers Against Sewage protest
Date: 21 April 2022 16:44:10

Hi [REDACTED]

You will be aware of a planned day of protest this Saturday being arranged by Surfers Against Sewage across the UK. The main location (may be the only location) in Scotland is at Portobello Beach.

We received previous requests from The Ferret for a quote around this protest and cso overflows. Today we receive an interview request from STV to speak to us tomorrow which [REDACTED] is going to cover for us.

Our key lines are around the following, including The Bathing Water results achieved in Scotland.

Not sure if you have been approached asking for a Minister to be interviewed?

I hope this helps.

Regards

[REDACTED]

In response to your enquiry, a Scottish Water spokesperson said: “Water quality in Scotland is considerably higher than elsewhere in the UK and across much of Europe. Two thirds of our waters already meet good status and last year 99% of Scotland’s bathing waters passed stringent environmental standards with more than ever reaching ‘excellent’ status.

“Over the past 20 years, Scottish Water has invested heavily to help deliver substantial improvements to Scotland’s water environment. We take our environmental responsibilities extremely seriously and know that, despite these improvements, we have much more to do.

“To complement a new action plan to protect and improve Scotland’s water environment and to ensure that the country’s rivers, beaches and urban waters are free from sewage related debris, Scottish Water published its urban waters route map in December 2021, announcing plans to invest up to half a billion pounds more in Scotland’s waste water network.

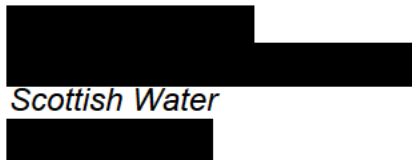
“This route map recognises the steps that we need to take in the face of increasingly extreme weather resulting from climate change and the impact that this has on an ageing sewer system.

“The plans will enable us to target investment in improving our monitoring, reporting our performance and upgrading the worst performing CSOs.

“Customers also play a huge part in preventing sewer flooding, blockages, and debris in rivers and on beaches by ensuring they do not flush items such as wet wipes down toilets and into our network and flush only the three Ps – pee, poo and

(toilet) paper.”

“We are absolutely committed to protecting Scotland’s urban waters for decades to come and will continue to work in partnership with the Scottish Government, SEPA, local authorities, customers and others to this end.”



SW Public
General

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Scottish Water

www.scottishwater.co.uk

From: [REDACTED]
To: [REDACTED]
Subject: FW: Urban Waters Routemap again
Date: 08 June 2022 09:29:11
Attachments: [Scottish Water update.msg](#)
[RE Scottish Water update.msg](#)

FYI - My previous email refers – update on SW meeting with SoSLeith

[REDACTED] | Water Policy and DECC Operations Division | Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED]@SCOTTISHWATER.CO.UK>
Sent: 02 June 2022 15:09
To: [REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]
[REDACTED]@scottishwater.co.uk>; [REDACTED]@gov.scot>
Cc: [REDACTED]@SCOTTISHWATER.CO.UK>
Subject: RE: Urban Waters Routemap again

Hi all,

To add to the info below, I have had some correspondence with Save Our Shore, Leith group in the past month as well as a meeting with Ben Macpherson MSP in relation to this.

Two emails attached for your info:

- First is email to the group advising of prioritisation matrix for improvements and highlighting those specific to the Water of Leith.
- Second email was a follow up to meeting with Ben just acknowledging our discussion and his ongoing interest.

I hope this helps,

Cheers

[REDACTED]

SW Internal
General

From: [REDACTED]@SCOTTISHWATER.CO.UK>
Sent: 02 June 2022 09:23
To: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@gov.scot>; [REDACTED]@SCOTTISHWATER.CO.UK>
Cc: [REDACTED]@SCOTTISHWATER.CO.UK>
Subject: RE: Urban Waters Routemap again

Hi all

The email attached covers the position with the Forth Estuary UIDs. It identifies that 25 of the 26 UIDs identified as a priority when the study concluded are in development and are included in the published list of high Priority UIDs.

In December 2021, the UID list was re-prioritised with one Forth Estuary UID being reclassified as a low priority. This is not included in the published list of high priority UIDs but does remain in development, since this work had already started and the FE Study generated a need to look at this.

The attachment within the email from [REDACTED] sets out communication around a request from Shirley Anne Somerville, MSP.

If you need anything else, please let me know.

[REDACTED]

SW Internal
General

From: [REDACTED] <[REDACTED]@scottishwater.co.uk>

Sent: 01 June 2022 15:48

To: [REDACTED] <[REDACTED]@gov.scot>; [REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>

Subject: RE: Urban Waters Routemap again

Hi All

Attached is the previous note I sent to [REDACTED] re Water of Leith. [REDACTED] has there been any further meetings with this group/ matters of significance that needs to be highlighted?

[REDACTED] anything specific to add regarding CSO's into the wider Forth?

Regards

[REDACTED]

[REDACTED]

Scottish Water

[REDACTED]

SW Internal
General

From: [REDACTED] <[REDACTED]@gov.scot>

Sent: 01 June 2022 15:33

To: [REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED] <[REDACTED]@scottishwater.co.uk>; [REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>

Subject: RE: Urban Waters Routemap again

Thanks [REDACTED] – as [REDACTED] is on leave this week I'd be grateful if either [REDACTED] are

able to share what was provided to him in response to the SOS Leith query, I have our reply to the correspondence but it naturally focusses only on Water of Leith and not the wider issue of other CSOs that discharge into the Forth

[REDACTED] | Water Policy and DECC Operations Division | Scottish Government | 3F South | Victoria Quay | Edinburgh | EH6 6QQ | [REDACTED]

I am currently working from home, my normal working hours are 07:30-17:00

From: [REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>

Sent: 31 May 2022 13:48

To: [REDACTED] <[REDACTED]@scottishwater.co.uk>; [REDACTED]

[REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>

Cc: [REDACTED] <[REDACTED]@gov.scot>

Subject: RE: Urban Waters Routemap again

[REDACTED] [REDACTED]

We landed on a briefing for SOS Leith for [REDACTED] that would likely answer [REDACTED] desire to have lines ready, don't you think?

This would also address any questions about coverage within the IUW Route Map I think.

Can you send the final version of this on to [REDACTED] I don't know if I have it.

[REDACTED]

SW Internal
Personal

From: [REDACTED] <[REDACTED]@gov.scot>

Sent: 31 May 2022 13:00

To: [REDACTED] <[REDACTED]@SCOTTISHWATER.CO.UK>; [REDACTED]

[REDACTED] <[REDACTED]@scottishwater.co.uk>

Subject: Urban Waters Routemap again

Importance: High

****EXTERNAL MAIL**** - Think Before You Click

[REDACTED] – you may have seen the recent BBC article focussing on wet wipes and legacy sewage spills Firth of Forth – [Harmful bacteria survives longer on plastic Scottish beach waste - BBC News](#) - we need to have lines specific to the Forth estuary in case this gets picked up, so also copying [REDACTED] who is aware of the article in case he has SW lines to hand? I've included lines we used from last year which we will need to update and so would appreciate any input you can offer please.

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Scottish Water

www.scottishwater.co.uk

From: [REDACTED]
To: [Ben Macpherson](#)
Cc: [REDACTED]
Subject: RE: Scottish Water update
Attachments: [image001.jpg](#)

Dear Ben,

Thank you for asking to meet with me this morning (virtually) to discuss progress from Scottish Water on plans for investing in our waste water network in Edinburgh and taking an ongoing interest in this important issue.

Below is an email I sent to 'Save Our Shore, Leith' (SOSL) group on Friday last week, which highlights progress on our Urban Water Routemap and newly published information on how we prioritise combined sewer overflows for improvements. As I mentioned this morning, we now have a list of the top priority assets we are looking at, which include 24 on the Water Of Leith (8 of which I believe are in the area of primary interest to SOSL).

From this list we will now commence work on scoping possible options for improvements. It's important to note that depending on complexity of options this work will take time before any decision is made to carry out any physical work (if feasible). In the meantime we continue to be vigilant in making sure our network is operating as it should and helping to protect the environment, whilst minimising possible flooding.

We will continue to keep you and the community updated on progress and any work in the area.

Kind regards

[REDACTED]

SW Public
General

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Sewage pollution- RIVER TEVIOT
Date: 30 June 2022 12:46:04
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi all.

Following the original F&E return being submitted to SEPA on 31st January 2022, there was a follow up query from SEPA sent in April 2022 to our Area Advisors for the South ([REDACTED]). The query was looking to get further detail and background relating to the Hawick spill events reported through the January return.

Following this, we reviewed the data reported again and found some confusion about the signals being used to collate the data required for Hawick WwTW CSO & EO.

We reviewed the available site data for Hawick WwTW to be able to accurately ascertain 'if' the site was in mechanical or electrical fault which would initiate an EO spill, of which none were noted to have occurred in 2021 following the review.

The CSO data reported was also reviewed and by using alternative level signals to support the data collated, we sent this refreshed data for both the CSO and EO in the form of a resubmission to SEPA on 5th May.

The original SEPA query was also responded to by our Area Advisors in the form of summary information and detail of the site set-up and possible reasons for the inaccurate data being reported.

Going forward we continue to have this as an action within our Flow & Event Working Group to ensure the appropriate signals are used to support the accuracy of the data for Hawick and to mitigate any risk of misrepresenting the site's environmental impact in future F&E returns.

Regards,

[REDACTED]

[REDACTED]

Environmental Regulation Analyst
WW Strategy & Environmental Regulation

Landline / Teams : [REDACTED]

Mobile : [REDACTED]



Sign up to back the ban on wipes containing plastic through [Nature Calls - Scottish Water](#)

SW Internal
Personal

From: [REDACTED]@SCOTTISHWATER.CO.UK>

Sent: 30 June 2022 10:49

To: [REDACTED]@scottishwater.co.uk>; [REDACTED]
[REDACTED]@SCOTTISHWATER.CO.UK>

Cc: [REDACTED]@gov.scot>; [REDACTED]@gov.scot>; [REDACTED]
[REDACTED]@scottishwater.co.uk>

Subject: Fwd: Sewage pollution- RIVER TEVIOT

[REDACTED]

I know [REDACTED] is off this week. Are we able to provide an explanation for the change in F&E return data provided at Hawick WwTW?

Did we do this as part of the revised return?

[REDACTED]

Get [Outlook for Android](#)

From: [REDACTED]@gov.scot>

Sent: Thursday, 30 June 2022, 09:24

To: [REDACTED]@SCOTTISHWATER.CO.UK>

Cc: [REDACTED]@gov.scot>

Subject: RE: Sewage pollution- RIVER TEVIOT

Hi [REDACTED]

The Minister has asked us to follow-up on this in light of a recent PQ from the local MSP.

Do you have any further information on why the January data was incorrect given the significant difference?

Thanks,

[REDACTED]

Policy Officer
Water Industry Team
Scottish Government
Office: [REDACTED]
Mobile: [REDACTED]

From: [REDACTED]@SCOTTISHWATER.CO.UK>

Sent: 20 May 2022 10:43

To: [REDACTED]@gov.scot>

Cc: [REDACTED]@gov.scot>

Subject: RE: Sewage pollution- RIVER TEVIOT

[REDACTED]

The data used by the BBC to create the figure below came from our flow and event return to

SEPA in January 2022.



This shows just over 90 EO spills at Hawick in 2021.

I have received the following from the team involved in making the flow and event return. You'll see that the EO figures for Hawick have been revised in a new F&E return made in May, correcting original data. The position is not as serious as our data first made out.

Flow and Event Return - January 2022

The original data included spill events for CSO and EO.

The Hawick data was queried for accuracy within the Working Group and an action initiated to check the accuracy of the data. The working group received feedback from that, whilst the data looked questionable, it was deemed accurate and reportable.

So the data reported on 31/1/2022 for Hawick is summarised below.

	<i>Number of spills</i>	<i>Duration of spills (in hours)</i>
<i>Hawick CSO</i>	<i>56</i>	<i>795:28:00</i>
<i>Hawick EO</i>	<i>93</i>	<i>1379:02:00</i>
<i>Hawick SSSO</i>	<i>15</i>	<i>902:50:00</i>

This is clearly shown in the BBC graph

Flow and Event Return Update - May 2022

Data was revised following the BBC article and SEPA queries, the data re-reported on 5/5/22 is below

	<i>Number of spills</i>	<i>Duration of spills (in hours)</i>
<i>Hawick CSO</i>	<i>20</i>	<i>48:18:52</i>
<i>Hawick EO</i>	<i>No events</i>	<i>No events</i>
<i>Hawick SSSO</i>	<i>15</i>	<i>902:50:00</i>

You'll note whilst we believe there were no EO spills at Hawick last year, we also believe that there were many fewer CSO spills, which is good news for the Teviot.

This new data reported on the 5th May is considered the most accurate representation of what's happening on site. There is an action in the Return Working Group to try and find a simpler, consistent resolution ahead of the new flow return.

This does show how important it is that we have the best information available for reporting.

The route map sets out new requirements and commitments for reporting data and we'll need to be confident in everything that we report moving forward.

Please let me know if you need more on this.

██████████

SW Internal
Personal

From: ██████████@gov.scot>
Sent: 20 May 2022 08:50
To: ██████████@SCOTTISHWATER.CO.UK>
Cc: ██████████@gov.scot>
Subject: FW: Sewage pollution- RIVER TEVIOT

****EXTERNAL MAIL**** - Think Before You Click

Morning ██████████

Hope you are well.

Please see the attached correspondence. Are you able to offer any lines about issues in Hawick, and confirm whether they will be addressed in the routemap?

Thanks,

██████████

Policy Officer
Water Industry Team
Scottish Government
Office: ██████████
Mobile: ██████████

From: LAMONT, John <john.lamont.mp@parliament.uk>
Sent: 09 May 2022 13:46
To: Scottish Ministers <Scottish_Ministers@gov.scot>
Subject: EMAIL TO MAIRI MCALLAN MSP RE RIVER TEVIOT CONCERNS

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