# RESPONSE TO SEPA CONSULTATION: Water Supply & Waste Water Treatment Sector Plan

Questions 1 and 2 are of an administrative nature, viz. identifying who is the respondent.

### 3. What is your interest in the Water & Waste Water Treatment Sector Plan?

**SANA response**

SANA is the sport governing body for game-fish angling in Scotland. Our interest in the consultation is that good quality freshwater habitats for fish and for freshwater invertebrates are prerequisites for conservation of fish stocks.

### 4. Do you agree with our vision for the sector?

Strongly agree Agree Not sure Disagree Strongly disagree

If you don’t agree, or only agree in part, please give your reasons and suggested alternatives

 **SANA response**

Disagree. SANA’s response to this question must be in two parts. Firstly, we strongly agree with the consultation paper’s general aspirations for a high quality water environment. However, we are faced with a situation where, in many places, we have not got the best possible water quality and/or volume. Therefore, as our second observation on the vision, we suggest that the vision must include measures to improve the situation.

Our comments on these specific issues have also been made to Scottish Water in the context of their business plan. The subjects of concern are waste water treatment plants and combined sewer overflows. They are reported in our answers to this consultation.

### 5. Does the plan identify all the key partners and influencers that might be able help in achieving our vision?

Strongly agree Agree Not sure Disagree Strongly disagree

If no, please suggest different partners and influencers that we could work with, giving reasons for your suggestions

**SANA response**

Agree. The aspiration to work with “other partners” as well as those named is laudable. However, we wonder whether it would be prudent to clarify who these are and we suggest that those in regular close contact with water bodies, such as anglers, should be included.

### 6. Have we identified the right set of actions to help achieve our vision and further improve the environmental performance of the sector?

Strongly agree Agree Not sure Disagree Strongly disagree

If no, please suggest additional or alternative actions, giving reasons for your suggestions

**SANA response**

Disagree.

**WWT**

It is a fact of life that our society produces waste materials and dealing with that waste presents challenges. As stated in the Scottish Government’s discussion paper, “Developing an Environment Strategy for Scotland”, there needs to be an ambition to do it better. “Our ambition is to continue to establish Scotland’s place in the world as a country ready to lead global action to address current and future environmental challenges, and to collaborate with others as we do that.”

The paper identifies the subject of water quality: “ .. it is clear that significant future action is needed, for example, ... to tackle waste and diffuse pollution of water courses ..”.

We arrived at this position where collecting and treating waste water, borne of the need to improve environmental performance, has itself become a problem - because the content of the waste has changed. It is not only a volume issue, arising from constantly adding more houses in a catchment and thereby stretching the capabilities of WWT plants to cope. Also, most houses have washing machines or dishwashers or both. These machines use detergents that commonly contain phosphates. Innovation in composition of household cleaning products, perhaps driven by regulation, may ameliorate the impact in the future. For example, a voluntary switch of detergent type by households in the Loch Leven catchment was tried. However, higher costs of phosphate-free detergents make the impact of such moves uncertain. Here and now, we need waste treatment solutions. The technology to remove phosphates from waste water is proven, but we lack widespread application in treatment plants.

SANA proposes that the Scottish ambition should be to use phosphate “scrubbers” at all WWT facilities.

**CSOs**

Thanks to extensive coverage in the BBC’s Countryfile programme, point source water pollution from CSOs is now a subject of public attention. Many anglers were only too aware of intermittent discharges, not only following extreme rainfall events.

The central principle of a CSO facility is to enable WWT plants to be bypassed when excessive rain overwhelms storage capacity at treatment sites. Defence of this practice rests on the dilution effect of spate conditions in the receiving waters. This raises two questions: why is there not more storage capacity to cope with such events and why are these consents being used at other times?

The first of these questions is fundamental to the intended practice. The second could be about the need to monitor the use of CSOs and enforce the law on pollution prevention or it could be about Scottish Water seizing the initiative and acting at its own hand to improve performance.

The question of extra storage capacity should, in principle, be easy to assess were it not for the lack of monitoring. However, the process of River Basin Catchment Planning (to ensure compliance with the Water Framework Directive) provides a structure for assessment.

There should be no excuse for using CSOs to discharge untreated waste to rivers without the dilution effect of high water conditions in storm events. However, it can be understood that WWT plant failures may from time to time cause emergencies. In dealing with such situations, that brings the subject back to having adequate holding capacity for untreated sewage. Probably, Scottish Water knows where and when such situations can arise. Therefore, an internal review may be enough to determine where to put new storage in place.

### 7. Do you agree with our proposals on where we should focus our work initially?

Strongly agree Agree Not sure Disagree Strongly disagree

If you don’t agree, please give your reasons and suggested alternatives

**SANA response**

Strongly disagree. Section 6 of the consultation paper lacks any sense of specific prioritisation. SEPA must be well aware of where WWT and CSO impacts on freshwater and coastal waters are most acute. We recognise that this substantial subject is unlikely to be resolved quickly. The best of all possible waste treatment and lots of new storage for raw sewage cannot be expected everywhere on day one of a new policy. But it must start somewhere. Scottish Water itself is best placed to initiate these reforms and, as noted, River Basin Management Planning provides a forum for involving other state institutions. What SANA would like to see is a clear statement of intent with timetabled improvements and budgets for new spending on upgrading WWTs and reducing current dependence on CSOs.

### 8. Do you agree with our proposals for streamlining and strengthening the way we regulate private waste water systems for new houses or extensions to existing houses?

Strongly agree Agree Not sure Disagree Strongly disagree

If not, please give your reasons and suggestions for alternative approaches

**SANA response**

Strongly agree. While not qualified to comment on the detail of this subject, we note the commentary on private waste water systems, welcome the higher standards for new and modified ones and hope that incentives and substantial support can be deployed to upgrade the many existing sub standard ones.

### 9. Do you have any other comments you would like to make about the sector plan?

Yes No

If yes, please provide them below

Yes. We have two subjects which were not addressed directly by our answers to other questions.

1. The main focus of our above comments is about waste water in terms of point source pollution. Diffuse pollution can also have a significant effect on water bodies. In respect of impact on fish habitat and on prey species, we include siltation in the term as well as more conventional “polluting” substances.

In effect, diffuse pollution is the outcome of waste water pollution from private and public (e.g. forestry) sources. The consultation paper has addressed private waste water treatment failures but not waste water that is not passing through treatment facilities. It notes the need to protect water supplies from diffuse pollution at page 9 but not the need to protect water bodies more generally. This aspect of diffuse pollution is, of course, bound to be considered in the coming river basin management planning exercise and we hope to be able to participate.

2. A potential game-changer in terms of care of the aquatic environment is the uptake of new technology by the general public. Public ignorance of what constitutes good practice in what products households use and put down their drains should be countered.

We have raised the subject of detergents in response to question 6 but there is a wider issue. Most infamously, “fatbergs” may be mainly a commercial waste issue but households are bound to contribute. They are the source of multiple objects which enter the aquatic environment when screens at WWT plants are not working properly and when, all too frequently, CSOs are used to directly discharge to rivers and the sea.

While the impact of better public understanding will take some time and we understand SEPA’s reluctance to make it a priority issue, it should start as soon as possible and we suggest that formal recognition in the education curriculum be encouraged and assisted.

*29/01/19*