

Scottish Water Consultation Response

Safeguarding Scotland's Water Environment



March 2026

Overview

General Comments

Scottish Water welcomes the opportunity to respond to SEPA's *Safeguarding Scotland's Water Environment* consultation.

We understand that this is one component of various consultations in preparation for the fourth cycle of River Basin Management Plans (RBMP4), covering the period between 2027 and 2033. We understand that the draft RBMP4 plan for Scotland will be consulted on in December 2026 and the final plan will be published by December 2027.

We are seeing a shift in awareness of the importance of the water environment, and we recognise the important part it must play in tackling the impacts of climate change, biodiversity loss and contributing to Scotland's net-zero ambitions. Scottish Water's long-term investment strategy focuses on ensuring resilient, affordable and sustainable water and wastewater services over the next 25 years. It is shaped by the need to adapt to climate change, protect water resources, upgrade ageing assets and improve environmental outcomes.

Detailed Response

Specific Comments

1.	To what extent do you agree that we have identified the most significant water management issues affecting Scotland's water environment?
	Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Don't know
	Tell us what else is important that should be included?
We agree that the most significant water management issues have been identified within the consultation. We would welcome further information on how RBMP4 intends to address the threats and pressures, and which proposed themes these will sit in. For instance, Invasive Species are identified as a threat but there is no further reference to this within the consultation document.	

The 'Wastewater and Sewer Network' section of the consultation describes localised impacts on water quality, amenity and wildlife and requests that an updated Improving Urban Waters (IUW) Routemap is developed. It is acknowledged that these assets can have localised impacts however, these can be more difficult to establish as water quality is monitored at specific locations for classification purposes. Systematically identifying localised water quality issues would require a more granular monitoring and classification network which may result in changes to the overall status of Scotland's water environment. It is unclear whether there will be changes proposed to the current approach to identifying and prioritising Unsatisfactory Intermittent Discharges (UIDs) and/or other water quality pressures in RBMP4 based upon the ambition to consider more localised impacts.

It is recognised that significant work will be required to undertake the monitoring, analysis and the collaboration required to define pressures which will support the development of RBMP5.

2.	To what extent do you agree that each of the following should be a theme for RBMP4 to support collaboration? Climate adaptation/Nature/Health & Wellbeing Strongly agree Agree Neither agree nor disagree Disagree Strongly disagree Don't know If you selected "Disagree" or "Strongly disagree", please tell us more about the reasons for your response.
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We strongly agree with the adoption of the three proposed themes identified in the consultation to support collaboration (climate adaptation, nature and health and wellbeing).

It is assumed that any new issues identified as a result of the introduction of the three new themes in RBMP4 will inform requirements for RBMP5.

We are supportive of the proposed use of three themes to organise information in the RBMP. We would welcome further information on what each theme includes and how these themes will encourage collaboration, particularly where waterbodies face issues that lie across multiple themes. For example, fish barriers are shown in the Treemap as pressures for both the climate adaptation (Figure 1) and the nature (Figure 2) themes in the report.

Climate Adaptation

Scottish Water strongly agrees that climate change adaptation should be a theme to encourage collaboration in RBMP4. No one party can adapt to climate change in

isolation, and we strongly agree that mechanisms to support collaboration will be vital to success in this area.

Scottish Water published its Climate Change Adaptation Plan in 2024 ([Scottish Water Adaptation Plan](#)). This identified the following key climate change risks that we need to address:

- Warmer, drier summers that can lead to drought and deteriorating raw water quality.
- Wetter winters that cause flooding.
- Variable rainfall patterns that impact environmental performance.
- More frequent storms that disrupt our assets and services.
- Sea level rise and coastal erosion that floods or damages our assets.

The following actions, relevant to RBMP4 are included in the plan:

- To address drought risk, we highlight the need to develop and implement national and regional water resource planning and are therefore supportive of this being highlighted as a key consideration for RBMP4.
- To address deteriorating raw water quality, we highlight the need to collectively improve data collation and storage of environmental data and to work with landowners to address water quality risks in catchments and would welcome the inclusion of such datasets within the scope of RBMP4.
- To address the risk of variable rainfall patterns impacting our ability to meet environmental performance targets, we highlight the need to adapt our wastewater treatment works. We will look to agree with SEPA the timing for this adaptation within RBMP5 and beyond.

Nature

Scottish Water strongly agrees that nature should be a theme to encourage collaboration within RBMP4 since healthy water environments are essential for protecting biodiversity and addressing the nature crisis in Scotland. Achieving the Scottish Biodiversity Strategy goals of halting biodiversity loss by 2030 and restoring nature by 2045 depends upon a strong collaborative approach across Scotland. River Basin Management Planning is a vital delivery mechanism for this as it allows national biodiversity objectives to be translated into targeted actions that improve river conditions, restore catchments and connect habitats.

Health & Wellbeing

Scottish Water strongly agrees that health and wellbeing should be a theme to encourage collaboration within RBMP4 because Scotland's water environment plays a critical role in supporting public health, providing clean drinking water, enabling food production and offering recreational activities.

The consultation states that the 'treemap' does not include chemicals or contaminants of increasing concern since analytical capabilities and risk assessment approaches are still developing. We would welcome further information on how risks will be

monitored, how impacts will be assessed and how this may affect RBMP requirements when this becomes available. The general approach applied currently is source control through the [One Health Breakthrough Partnership](#) (OHBP). It is important that RBMP plans consider and set out clear source apportionment of measures to cumulatively address the significant water management issues.

3. In what ways is river basin management planning currently considered or applied in your work, activities, or community?

River Basin Management Planning is central to how Scottish Water plans, prioritises and delivers maintenance and enhancement investment at assets to protect and enhance Scotland's water environment. Enhancement includes upgrades to wastewater treatment works, improvements to combined sewer overflows (CSOs), measures to manage impact from water abstraction and to remove barriers to fish passage. We are currently working to a defined programme in RBMP3 which is due to be complete by December 2027.

In our draft business plan for SR27, which was shared with water industry stakeholders, we have recognised RBMP as the core consideration in setting ambitions for the water environment. We have assumed that RBMP4 will require significant investigation activity to understand emerging areas of concern (i.e. stricter treatment standards for nutrients and other parameters, forever chemicals, microplastics and antimicrobial resistance) to support the development of objectives for RBMP5 and beyond.

Water Use

Our current water resource planning approach is focussed on ensuring we have enough water for public water supply and how we will maintain sustainable abstraction over the next 25 years. Our supply demand balance models, (which include monitoring and metering of our abstractions and compensation flow releases and climate change models on water availability and demand projections) show that some of our supply systems are in supply deficit. Opportunities to look beyond our own catchments and redefine the boundaries to look more holistically at basin-scale planning will be required to ensure we are able to meet the future demands for water in a changing climate. It will also identify where we have sufficiency of supply – and therefore better maximise its value for our customers, communities and the environment.

A future allocation regime should give full consideration to the environmental, economic and social equity drivers of water use.

- Scottish Water carries out water resource planning techniques to understand water supply risks and underpin investment decisions to ensure we have effective controls in place. Our environment and planning teams regularly consult with third parties and stakeholders as part of the project work.
- Operational Drought Plans are implemented as a drought emerges to ensure we maintain supplies to our customers, within environmental limits. We consult with regulatory stakeholders as part of this process.
- We have a Programme of Water Framework Directive (WFD) improvements in SR27.

- We operate under Environmental Authorisations (Scotland) Regulation (EASR) guidelines.

Wastewater and Sewer Network

Our current approach focuses on carrying out environmental studies where water quality objectives are at risk from our continuous and intermittent discharges. Through these studies, we have identified all of the enhancements that can help support improvement in waterbody classification enabling the creation of specific RBMP objectives. We propose to continue to carry out investigations when surveillance suggests that these are required, using dynamic modelling and wider data which is being made available through deployment of overflow event and effluent monitoring.

In 2021, we created our Improving Urban Waters Routemap (IUW) to capture our ambitions to better monitor and publish information, to improve performance intelligence and to prioritise and deliver improvements at Unsatisfactory Intermittent Discharges (UIDs). We recognise the need to update this routemap to show the pathway for dealing with UIDs which are evidenced as having localised impacts on waterbodies.

4.

Please share with us examples of participation and engagement which have worked well and could be used for river basin management planning.

Scottish Water is continuously involved in various levels of engagement with stakeholders across the water and environment sectors. Please see examples given below:

- Scottish One Health AMR Register (SOHAR): brings together Anti-Microbial Resistance (AMR) related research involving Scottish researchers and organisations. It shows how Scotland is contributing to national efforts and helps identify where more work is needed. We have been part of workshops to inform key knowledge gaps and capabilities and how the register can be used proactively.
- We are steering group members for a Scottish Environment Food & Agriculture Institutions (SEFARI) Fellowship to produce a strategic routemap for optimising the potential uses of DNA and other biomolecules to efficiently monitor and better understand Scotland's environment. The significant threats of biodiversity loss, climate change and pollution have motivated this funded project to contribute towards their mitigation through developing the key strategy for environmental monitoring in Scotland for the next decade. Lead by James Hutton Institute with representatives from Scottish Water, SEPA, Scot Gov, Nature Scot and others.
- UK Water Industry Research Project (UKWIR) - Better Health Protection Measures for Rivers. We have a representative on the steering group. The need for this project is the growing demand for access to inland waters for recreation and leisure activities. This can cause a regulatory monitoring burden at water company assets and in receiving waterbodies. The project is concentrated on the health risks of microbiological organisms and how to monitor them (e.g. norovirus) for recreational activities that involve water

	immersion in freshwater, concentrating on the riverine environment (i.e. flowing water). • The work carried out between Scottish Water and SEPA regarding accreditations required for the new EASR worked well for agreeing timeframes for validations of new analysis. • We have been involved in early discussions with Scottish Government, Water Industry Commission for Scotland and SEPA on shaping the future of water sector policy (along with other stakeholders through the ScotGov consultation). We believe that Climate Change projections require a shift to a more holistic approach in Scotland - a National Plan for all water users to ensure a just transition, fair and equitable for all, especially in drought. This may take many years to implement. In the short term, we are keen to explore partnerships that consider water resources, water quality and flood risk management and to have the shared understanding of how water users interact in a catchment. • We have worked with stakeholders and partners in several urban areas as part of the Blue Green Infrastructure (BGI) approach to sustainably managing surface water. The success of this approach requires collaboration and partnership working. • Our Sustainable Land Management (SLM) team provides expertise on protecting and improving source water quality and activities within drinking water supply catchments. Work includes proactive and reactive catchment investigations, processing catchment activity notifications, catchment analysis, research and managing peatland restoration projects. This work involves collaboration with stakeholders in catchments for the benefit of water quality and availability.
5.	Please share with us examples of where you have used innovative techniques to deliver improvements to the water environment.
	Our research and innovation programme is delivered through collaboration across academia in Scotland, the UK and abroad, working with our supply chain and exploring wider opportunities with other water companies. Through targeted research and innovation and transformation programmes we seek to enhance our knowledge and capability to adapt the way we work and to make the sustainable change necessary to drive better outcomes, ensure long term service excellence and go beyond net zero emissions. Standardisation will enable us to capture best practice and embed repeatability across how we design, build, operate, and maintain our assets e.g. standardised designs for UIDs. The Blue Green Infrastructure (BGI) approach has been used in several areas to manage surface water, reduce flooding and pollution risks and enhance urban environments sustainably by leveraging the strengths and capabilities of a diverse group of partners and stakeholders.

Scottish Water was involved in the development of a method to quantify 47 Per- and Polyfluoroalkyl Substances (PFAS) in four water types to meet the regulatory requirements of 0.1 µg/L for the 'Sum of 20 EU identified PFAS' compounds and 0.005 µg/L for individual compounds. The approach used solid phase extraction (SPE) and high-performance liquid chromatography coupled with triple quadrupole mass spectrometry.

Additionally, Scotland's variable climate means that, at some of our sites, we are needing to constantly adjust and operate assets and equipment to keep within environmental limits. With over 500 raw water monitoring points to maintain, we are looking to pilot automated flow valves to help with changing loch levels and releases of compensation flows.

6.	Is there anything else you think is important for us to consider when developing RBMP4?
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The following could be considered further in the development of RBMP4:

- Collaboration will play a key role in implementing RBMP4 and development work for RBMP5. Success will rely on a framework for partnership working with shared goals/outcomes being developed. This will enable coordination across stakeholders, allow environmental, economic, social and operational factors to be considered together and better decision-making across the whole catchment. As previously stated, Scottish Water commits to collaborating to support the achievement of the RBMP4 objectives applying the principles of source apportionment, evidence-based investment and proportionate/reasonable.
- RBMP4 should embed the principles of integrated catchment planning, stemming from the established Integrated Water Resource Management framework which considers the broader economic value of water-related ecosystem services and the economic consequences of water scarcity and poor water quality.
- Policy and drought planning and subsequent investment for other sectors (linked to national industrial, energy, and agriculture strategy) – not just public water supply.
- How the health of the water environment for water use regulations is assessed in a climate change impacted future will require careful and holistic assessment of all aspects of environmental health, rather than focusing solely trying to achieve preindustrial flow levels. Careful assessment is required of the true requirement of the environment. A helpful approach is laid out in the recent UKWIR Environmental Destination methodology.
- The work with Scottish Government, SEPA and other stakeholders to consider the requirements of a recast Urban Waste Water Treatment Directive (UWWTD) in Scotland reflects potentially ambitious targets for enhancement which must be considered against the need for improvement in Scotland's water environment and should be defined through RBMP.
- The importance of the draft RBMP4 plan setting out clear source apportionment of measures to address the significant water management issues.

- There is no reference to the Environmental Quality Standards Directive (EQS) or whether this will be adopted in Scotland. Is there any intention to undertake preparatory monitoring for the additional chemicals in the RBMP4 period?

- End of Document -