

The following are questions that have been raised by local community groups regarding the River Almond in the East Calder area. The answers are a combination of information from Scottish Water, SEPA and other agencies:

1. Do all the current CAR licenses along the River Almond fully comply with the Water Framework and Urban Wastewater Treatment Directive? SW – possibly answered before under FOI.

Urban Wastewater Treatment Directive requirements as transposed into the Urban Wastewater Treatment (Scotland) Regulations 1994 are set out within current licences. However, some improvement measures set out within RBMP3 (River Basin Management Plan 3rd Cycle) which are required to meet environmental standards the Water Framework Directive have not yet been captured within current licences. SEPA has made it clear that these RBMP3 improvements are required prior to 2027.

2. SEPA's river monitoring strategy (and what it classifies as a “pollutant”) appears to date back to 1998 – is this adequate to protect Scottish Water’s environment and human health from pollution?

SEPA and its predecessor organisations have been monitoring the quality of Scotland’s water environment for many years. In 2007, the water monitoring programme was expanded significantly to meet the requirements of the Water Framework Directive (WFD). This requires a broader, more holistic approach to monitoring and classifying Scotland’s aquatic environment. In particular, the Directive, and the associated River Basin Management Planning process, aim to protect and improve water bodies to meet targets for ecological condition, as well as water chemistry standards. The environmental standards that we monitor against are set by Scottish Government in the form of a direction to SEPA.

SEPA’s monitoring networks were designed following the detailed EU guidance required for the WFD, which remain the foundation of our water quality monitoring today. Our surveillance network of long-term monitoring sites is geographically distributed across Scotland and is designed to reflect the range of natural conditions and man-made pressures found across the country. A wide suite of chemical, biological and physical parameters are monitored at these sites to provide a full picture of environmental quality. Risk based monitoring is also an important part of SEPA’s water quality assessment. This is targeted at areas of the water environment which are known to be at risk of being impacted by specific pressures and focusses effort on the elements which are most likely to be affected by the specific pressure being assessed. For example, in areas where eutrophication is likely, we would focus on chemicals most associated with nutrient enrichment, and the algae and invertebrate species which are most sensitive to these pressures. Finally, we also carry out reactive monitoring, for example to assess the impact of unplanned discharges and pollution events. Our assessment of pollution events in the water environment usually involves chemical and biological assessment.

3. Is there a long-term aspiration to eliminate or significantly reduce the number of CSOs? Could SEPA agree a long-term target with Scottish Water to address this?

At previous River Almond Improvement Group meetings and in other correspondence, we have outlined the plans for improving the monitoring and visibility of CSO performance and reducing the impact of CSOs on water quality and on sewage related debris (SRD) in the environment.

Combined sewer overflows are an integral part of most of the sewer networks in Scotland and in the wider UK, ensuring that sewers do not back up and flood homes, streets and sewage works during heavy rainfall. However, these spills should not cause significant environmental harm

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

In response to this challenge, Scottish Water published the Urban Waters Routemap in Dec 2021-
[Urban Water Routemap - Scottish Water](#)

The route map sets out work which Scottish Water will take forward to address environmental impacts from CSOs, increase monitoring and public transparency and reduce spills in the long term.

Targets for reducing spills from CSOs are currently set only where environmental impacts have been confirmed.

4. In relation to the River Almond: will the frequency and volumes of combined sewage being discharged into the river reduce by 2027? If so, by how much?

There are 5 CSOs where spills are causing impacts on water quality and these have been included in the River Basin Management Plan for improvement by 2027. We expect Scottish Water to identify the most sustainable solutions to reduce spills in these locations. We will ensure that solution design is complete by 2024 at which point we will be able to confirm the expected reduction in spills.

Where CSOs are identified as causing significant litter, then SEPA has asked Scottish Water to make improvements. Solutions for addressing litter may include a reduction in spills and/or improved screening.

Following discussions with SEPA, Scottish Water published a [prioritisation method](#) for sewer overflows in Scotland in May 2022. Based on extensive ground survey and modelling studies of environmental impact, Scottish Water also published a [list of 108 overflows](#), which are considered high priority and are currently being progressed for improvement.

During 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. We highlighted the need for a step change in our efforts to tackle the most significant environmental impacts as soon as possible and to take a One Planet Prosperity approach to improving our urban waters for the long term. This includes progressively reducing sewer spills through a step change in blue green infrastructure across our towns and cities.

5. Will the public see less sewage-related debris (SRD) in the river, along its banks and beaches?

One of the aims of the range of strategies, policies, plans and work outlined in this document is to help reduce the likelihood of SR in rivers.

In addition to this our customers can also play a huge part in preventing debris in rivers and on beaches. Our new national campaign 'Nature Calls' urges customers not to flush wet wipes (and other items) down the toilet and we are calling for a complete ban on the sale of wet wipes containing plastic - [Nature Calls - Scottish Water](#)

6. Will remedial clean-up action be undertaken proactively by Scottish Water and Veolia following combined sewage spills?

Scottish Water and our partners (including Veolia) will always attend to clean up Sewage Related Debris (SRD) following an overflow operation. If any members of the public see SRD then they can report directly to Scottish Water via our 24/7 helpline – 0800 0778778 or our online portal.

Alternatively SEPA advise that any pollution can be reported to their hotline **0800 80 70 60** or through our online tool ([Report Environmental Events to SEPA](#)). SEPA aims to respond within 24 hours.

7. Will the CSO / SSO discharge data for the Almond be shared publicly in real-time? When will this be available to the public? Is there anything stopping this being done currently with spills from the WwTWs?

As outlined about, Scottish Water's urban waters routemap will give us improved data from monitors installed at CSOs, some of which will be on the River Almond. We aim to have information from SW monitors available in real time by 2024.

We are still looking at how this information will be shared and communicated

8. Can the public safely swim in the River Almond? If so, when is it safe for the public to swim in the river?

Answer provided by Public Health Scotland

Public Health Scotland has not produced public health guidance relating to wild swimming. However, we are 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.

9. Could Scottish Water and Veolia share the number of sewage spills occurring from their wastewater treatment works along the Almond on a monthly basis?

In terms of other reporting data, our planned investment in monitors will help provide more real time information in the future which isn't available at the moment. Veolia do provide reports to SEPA on performance of assets and we could provide the annual report, but this is retrospective.

We will have this available in real time by December 2024

10. Other than adhering to the 3Ps, can the public help to reduce the amount of CSOs being discharged into the River Almond?

Better uptake of the 3Ps (Nature Calls) amongst the public would be a huge step forward as many blockages and hence spills are caused by inappropriately flushed items. Consumer pressure on manufacturers and retailers who produce personal hygiene products would also lead to truly flushable products and hence less spills.

Widespread uptake of water butts and a reduction in impermeable surfaces (household driveways) at domestic and commercial properties will slow down rainfall run off and attenuate flows in the sewer resulting in less sewer spills.

11. Could SEPA please provide the results of their water quality monitoring data from last summer which covered the Bathing Waters application?

This data has been provided to the group, we are happy to make it available to anyone who hasn't already received a copy. For clarity, the panel did not consider water quality results in coming to their recommendation on the Almond.

12. Would Scottish Water consider incentivising the public to manage rainwater within their properties curtilage by providing a water bill reduction for those who manage all, if not a proportion of surface water runoff?

Scottish Water have been engaging with customers through a range of events and communications in 2022 about 'Saving Water' and being more water efficient. This includes looking at what customers can do around the home and garden to save water with the added benefit of surface water management. More info here – [Water Saving Advice - Scottish Water](#)
In terms of how customers are billed, this is a matter for Scottish Government water charging policy.

13. As identified West Lothian Council's Surface Water Management Plan, could funds for the Lighthouse project be used to provide water butts or to undertake retrofit SuDS projects the East Calder WwTW drainage catchment?

Scottish Water and our partners will look at a range of options, solutions and interventions for managing surface water in the East Calder catchment.

14. Is West Lothian Council being sufficiently funded to undertake the proposed work in their Surface Water Management Plan?

Directed at WLC

15. How effective has the Shieldhall Strategic Tunnel been in addressing flood risk and improving water quality of the Clyde? How much have CSO spills reduced by pre-and post construction and operation? Has water quality improved?

The £100 million Shieldhall Tunnel has undoubtedly reduced the impacts of flooding in areas of the southside of Glasgow as it was designed to do. It eliminated a number of very polluting CSOs from small tributaries of the River Clyde by providing large volumes of storage and attenuation for storm sewage flows. While the benefits to water quality from the Tunnel will not be evident in the River Clyde itself, the small tributaries will have improved now many of the CSO discharges have been removed. We do not hold the information on pre- and post-construction spill volume reduction.

16. How is Scottish Water proactively helping to deliver The Scottish Government's Water-resilient places - surface water management and blue-green infrastructure: policy framework?

Scottish Water have supported Scottish Government throughout the development of the recommendations set out in the Water Resilient Places policy framework and are playing a leading role in setting the direction of the national advisory group for surface water management, along with local authority, SEPA and Scottish Government representatives.

The WRP framework recognised that the activities of many parties are needed, due to the varying responsibilities for managing surface water, this collaboration across organisations and residents will be essential to ensure that everybody plays their role to effectively manage surface water risks, whilst delivering great blue-green places to live that are adaptable to the future.

Scottish Water are working with local authorities and SEPA to try and develop a replicable framework for how the WRP recommendations can be delivered in practice across Scotland from both a planning and implementation perspective. This includes a number of exemplar projects underway to plan at city, neighbourhood and street scale, and use these to inform how all partners embed what we learn into planning, regeneration and infrastructure projects in the future.

17. Is the UK Government and The Scottish Government sufficiently funding Scottish Water, SEPA and local authorities to reduce the impacts of surface water flooding AND improve water quality of receiving waters, particularly given the impacts of climate change?

- Prioritising funding to do the right things first.
- Increased Capital Investment spending from £650m per year to £1Bn to help Scottish Water invest in aging infrastructure, meet the challenges of climate change and protect the environment.

18. Could SEPA please provide evidence of their recent update at the stakeholder group meeting and confirm their plans for licenses and the River Almond website?

The River Almond Compliance Audit is underway, with the team gathering information and undertaking initial investigations. All WWTWs will have audit inspections this year and we will use that information to evaluate the efficacy of the existing permits and review or update permits where issues are identified. Further information on the work will be available later in the year.

SEPA will be reviewing the Scottish Water licences during the third RBMP cycle to reflect the improvements required at WWTWs and CSOs to deliver the water quality objectives.

The River Almond website hub is still in progress but has been delayed due to the development of our new beta website, which the hub will form part of. Further updates will be provided as soon as it is possible to do so. In the interim, Scottish Water will provide a platform where River Almond information can be shared on their website.

19. Could Veolia please provide evidence of their recent update at the stakeholder group meeting including the carbon costings?

- This has already been shared in April meeting 2022