

**Protecting Scotland's groundwater from pollution**  
**March 2021**

Overview

*General Comments*

This consultation covers revised environmental standards for substances that can adversely affect groundwater and a revised list of groundwater hazardous substances. Overall, the approach seeks to safeguard groundwater used for water supply, surface water fed groundwater and the future resource value of groundwater.

Detailed Response

**Specific Comments**

4	<b><i>Pollution Standards – Do you agree with the criteria we propose to use to determine whether groundwater has future resource potential?</i></b>
Yes, Scottish Water agrees with the criteria to determine future resource potential.	
5	<b><i>Pollution Standards – Do you agree that the standards to assess pollution of future groundwater should be based on an area of impacted groundwater rather than the current distance based approach?</i></b>
Yes, Scottish Water agrees that the application of the area based 1-hectare approach, rather than the distance-based approach, will take account of the size of the pollution source, the width of the plume and focus on the most polluted sites.	
6	<b><i>Pollution Standards – Do you agree that we should take into account any existing contamination present in the groundwater when making an assessment of pollution?</i></b>
Yes, Scottish Water considers that this approach would afford more protection to groundwater quality is a good approach.	
7	<b><i>Groundwater Status Standards - Do you agree that the trigger for determining that a groundwater body is considered to be at poor status should be based on a 20ha plume of hazardous substances rather than a 200ha plume of any contaminants?</i></b>
Yes, Scottish Water agrees that this would afford more protection to groundwater. As stated in the document, the impact of 20ha could impact a future source capable of supplying water to a whole town.	

<p>In footnote 10 on page 13 of WAT-PS-10, it says that for non-hazardous substances, an alternative site-specific assessment area capable of supporting 200m<sup>3</sup>/d may be proposed for consideration by SEPA, perhaps where groundwater is at depth in hard rock terranes.</p> <p>It would be beneficial for this consideration to apply to situations such as highly productive aquifers, aquifers with fracture flow and limited unsaturated areas. The 200m<sup>3</sup>/day assessment criteria would however preclude smaller public supply abstraction boreholes. Scottish Water has a number of those and may look to develop such sites in the future.</p>	
8	<p><b><i>Groundwater Status Standards - Do you agree that when assessing if a groundwater body is at poor status we should only consider impacts on nationally important groundwater dependant wetlands?</i></b></p>
<p>Scottish Water has no comment.</p>	
9	<p><b><i>Hazardous substances standards - Do you agree that we should update our list of hazardous substances in line with the JAGDAG recommendations?</i></b></p>
<p>Yes, Scottish Water agrees that this is a sensible approach.</p>	
10	<p><b><i>Hazardous substances standards - Do you agree that we should introduce standards for hazardous substances which identify the point at which there is a risk of groundwater deterioration, in order to ensure consistency and certainty?</i></b></p>
<p>Yes, Scottish Water agrees that this is a reasonable approach to provide consistency and certainty.</p>	
11	<p><b><i>Hazardous substances standards - Do you agree that our proposed hazardous substance standards should be based on drinking water standards and surface water environmental standards?</i></b></p>
<p>Yes, Scottish Water agrees that this is a sensible approach.</p>	
12	<p><b><i>Hazardous substances standards - Do you agree that issues of taste and odour should be taken into account in determining hazardous substance standards, in order to protect the future use of groundwater?</i></b></p>
<p>Yes, Scottish Water agrees that taste and odour should be taken into account. Inclusion would afford greater protection for the future potable use of groundwater.</p>	
13	<p><b><i>Changes and clarifications to our approach to land contamination and the water environment - Do you agree with our proposal to keep a record of any residual land contamination, where an exemption from the relevant groundwater standards has been applied to remediation work? How do you think this should be done, via legislation or by partnership working?</i></b></p>
<p>Yes, Scottish Water agrees with this proposal and approach, highlighting where future development of a water supply may not be suitable. We would welcome, where possible, inclusion of any retrospective records.</p>	
14	<p><b><i>Changes and clarifications to our approach to land contamination and the water environment - Do you agree we should raise the bar at which</i></b></p>

	<p><b>significant pollution is considered to occur in relation to the future groundwater resource?</b></p>
<p>Yes, Scottish Water agrees that it is reasonable to focus on the most significant and pressing historical polluting sites in the assessment of groundwater status. It is noted that there are other mechanisms to ensure that more localised contamination/pollution does not impact on the quality of water environment.</p>	
<p>15</p>	<p><b><i>Changes and clarifications to our approach to land contamination and the water environment - Do you agree that we should change the criteria for defining “special sites” from one impacting on a Devonian or Permian aquifer to one that is causing a water body to be less than good status or is posing a risk of deterioration in status?</i></b></p>
<p>Yes, Scottish Water agrees this is a good approach. As stated in the document, there are large abstractions from aquifers other than just Devonian or Permian Aquifers eg from alluvial gravels.</p>	

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