



**Scottish
Water**
Trusted to serve Scotland

22 July 2019

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Dear Mr Rickards,

May 2019 – UKTAG Proposed New and Revised Biological and Environmental Standards for the Water Framework Directive

Scottish Water welcomes the opportunity to comment on the above revised standards.

Section 2 – River Flows

Q2. Do you support the proposals to take account of short-term abstraction in classification? If not, please explain why together with any supporting evidence.

We support these proposals, with the further comment that the Qn98 exception maybe not applicable in lowland rivers where these flows do not necessarily result in disruption in the longitudinal wetted channel connectivity, even under impacted conditions.

We would suggest that different river typologies could be considered individually to ascertain if this exception should apply. For example, in the lower reaches of the River Dee (Grampian) longitudinal connectivity would not be at risk due to low flows.

Section 4 – Introduction of a Nitrogen Standard

Q5. Do you support the proposals to introduce lake nitrogen standards alongside the existing standards for phosphorus? If not, please explain why, together with any supporting evidence

Q7. Do you agree with how the proposed standards have been derived and are you content with the evidence base used for the proposed standard? If not, please explain why.

Scottish Water is not clear on the benefits that would be provided from applying the proposed nitrogen thresholds in relation to the ecological outcomes, given the range of other factors that may impact ecological status, notably phosphorus. Further, with the recognition there is a limited data set in Scotland on which to base these proposals, we would wish to see more analysis and monitoring to ensure that any standards are meaningful and effective in supporting improvements to ecological status.

Yours sincerely,

Professor Simon Parsons
Director of Strategic Customer Service Planning
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