

## CONSULTATION QUESTIONS

### Structure

#### **Q1. Do you agree with the timescales outlined?**

Yes  No

Scottish Water agrees with the timescale for the period of the Strategy. Reviews at approximately 3 year intervals seem reasonable.

However, as there are close links between this strategy and 'Towards a Litter-free Scotland' we would consider aligning the timing of reviews to be beneficial.

### Vision

#### **Q2. Do you agree with this vision?**

Yes  No

#### **Q3. Does the draft vision have the right level of ambition? If not, please offer alternative text or suggestions.**

In general yes we consider the vision sets the right level of ambition but recognises that it is set within a challenging timescale.

Key to success will be linking and closing gaps with *Towards a Litter-Free Scotland* Strategy, with all contributors addressing their responsibilities proportionate to the risk to the environment posed by the activity.

Scottish Water has contributed to and supported Marine Scotland in the development of the Strategy. The work we have carried out and continue to carry out, in terms of studies and investments, is summarised in the *Scottish Water Case Study* forming part of the introduction to the draft Strategy.

We wish to emphasise that wastewater treatment works (WWTW) are not sources of pollutants. Pollutants originate with the users of the system discharging to the drainage areas that supply WWTWs. Wastewater networks are open systems, providing a vital function to ensure safe sanitation and prevention of (sewer) flooding. It is imperative that we recognise that the best means to control pollutants, including litter, in a sustainable manner, is to prevent their release prior to flushing into sewers.

Therefore, in terms of Sewage Related Debris (SRD) being reduced, it is essential that the issue of inappropriate disposal of household items and industrial waste to sewer is also tackled within *Towards a Litter-Free Scotland Strategy*

To focus on discharges from WWTW risks driving very costly and carbon intense approaches to environmental protection not consistent with the polluter pays principle. In order to justify any investment in end of pipe solutions there must be a very high degree of confidence of the significance of the impact on the marine environment; that the investment measure is necessary to achieve Good Environmental Status (GES) and that measures of source control have been fully implemented.

### **Marine Strategy Framework Directive**

**Q4. Do you think implementation to achieve Good Environmental Status under Descriptor 10 will be sufficient or do you think additional action in Scotland is also necessary?**

Yes  No

The boxes above have been left un checked intentionally as the question has two parts.

With regard to achieving GES in the marine environment, Scottish Water would wish to draw attention to the investment that has been, and continues to be, delivered under our current and previous investment cycles (the Quality & Standards process (Q&S)). Over the past 11 years we have invested many hundreds of millions of pounds to meet the requirements of the Urban Waste Water Treatment Directive (UWWTD), Bathing Water Directive, Shellfish Waters Directive, Habitat & Birds Directive and other quality drivers.

This work has delivered significant improvements to Scotland's environment and will contribute significantly to achieving GES for other relevant descriptors in Scotland's marine waters.

We would wish to draw attention to previous paragraphs re source control, linkage with other Strategies and applying measures consistently to all sectors.

### **Strategic Directions**

**Q5. Do you agree that Strategic Directions are a suitable way of outlining action under the Strategy?**

Yes  No

**Q6. Do you agree with the list of Strategic Directions?**

Yes  No

**If not, how would you reword them or what would you add?**

We consider that the Strategic Directions clearly set out the high level issues that need to be addressed.

We would wish to again emphasise that WWTW and networks are not the originating source of pollutants. The systems are designed for a specific purpose - to collect, treat and return wastewater from homes and consented traders safely to the environment.

We consider that source control is fundamental to successful waste management. It must be recognised that, for Sewage Related Debris (SRD) in particular, the pathway of how and why the litter arrives in the marine environment is critical to successful control and this must also be addressed within *Towards a Litter-Free Scotland Strategy*.

### **Actions**

#### **Strategic Direction 1:**

**Q7. What are your views on the possible actions?**

**Q8. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q9. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q7. What are your views on the possible actions?**

This section would benefit from existing actions being set out as they are under other Strategic Directions.

The possible actions set out in this section are limited and tend to focus on items of litter found on the shore-line. This may give too much emphasis being placed on visual litter as opposed to litter that is actually damaging to marine species and habitats.

**Q8. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

Both possible actions are important and complement each other. We would always support source control and consider product development and labelling to be of primary importance in the overall hierarchy.

**Q9. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

The use of campaigns, such as Bag It & Bin It (BI&BI), is very successful in achieving targeted, short term objectives and is a useful tool to use within the overall Strategic Approach. However, although effective in the short term, continual reinforcement is required to support a long term strategic approach.

Strategic Direction 2:

**Q10. What are your views on the possible actions?**

**Q11. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q12. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q13. Do you think any of the existing actions need to be improved? If so, please provide details.**

**General Comment**

We found this section to be confused as Strategic Direction 2 states *land-sourced marine litter* but the text (3.4) describes land and sea based sources, activities, existing actions and possible actions.

We recognise that these issues are difficult to tease out but consider it may be appropriate in this case to develop a 2 tiered Strategic direction addressing the issue of land sourced and sea sourced litter.

In addition it highlights the confusion that can arise by the use of the term 'source', as within the pathway of waste disposal there may be several stages that could be identified as a source or where the litter could be prevented or intercepted.

Scottish Water will continue to carry out clean up operations where an operational or environmental event has caused an acute deposit of SRD.

**Q10. What are your views on the possible actions?**

Scottish Water considers that the National Marine Plan should set the framework for how marine litter reduction could be incorporated into regional marine plans. For organisations that operate at a national level, it can present problems where there are significant inconsistencies in requirements at a local level.

In terms of investment to meet legislative drivers, these would always have to be considered through the regulatory investment Quality & Standards process (Q&S), and there must be very clear evidence of an investment need that is proportionate to the benefit that will be derived.

**Q11. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

Scottish Water has no comment.

**Q12. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

Scottish Water information on Bag it & Bin It campaign is permanently available on our web-site under the overarching “Save our Drains” campaign which contains other information relevant to protecting the networks and environment e.g. Fats, oils and grease.

The main points from the Scottish Water case study, included in the draft Strategy introduction, should be set out in existing action sections of the Strategy wherever they would be best placed.

**Q13. Do you think any of the existing actions need to be improved? If so, please provide details.**

Scottish Water would expect to see the activities we are carrying out under our investment programme (e.g. to address unsatisfactory overflows) and our educational and campaign material to form part of the existing actions.

Strategic Direction 3:

**Q14. What are your views on the possible actions?**

**Q15. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q16. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q17. Do you think any of the existing actions need to be improved? If so, please provide details.**

Strategic Direction 3 refers to “waste as a resource” therefore prioritising the higher levels of the waste hierarchy, preventing or reducing waste, re-using waste or recovering waste (as a product or energy source).

We would wish to again emphasis addressing the waste problem at source prior to it entering the networks that serve WWTW is key. Our aim would be to make consumers more aware of the negative effects of flushing non-biodegradable wastes down their toilets (namely sewer blockages and pollution).

Strategic Direction 4:

**Q18. What are your views on the possible actions?**

**Q19. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q20. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q21. Do you think any of the existing actions need to be improved? If so, please provide details.**

**Q18. What are your views on the possible actions?**

Bullet point 2; we would ask if *determine* should replace *develop* as a more accurate description of the action required to establish baseline conditions? We would welcome clarification on this point.

**Q19. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

We consider that Bullet point 1, "*Alignment...OSPAR*" is the most important possible action, alignment of monitoring programmes and data as far as is possible would reduce overlap of effort and make the data meaningful at all relevant levels.

**Q20. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

Scottish Water has no comment at this time.

**Q21. Do you think any of the existing actions need to be improved? If so, please provide details.**

A more detailed investigation and review of the existing actions may be required to ensure alignment with the possible actions.

Strategic Direction 5:

**Q22. What are your views on the possible actions?**

**Q23. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

**Q24. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

**Q25. Do you think any of the existing actions need to be improved? If so, please provide details.**

**Q22. What are your views on the possible actions?**

The possible actions set out under Strategic Direction 5 all appear to relate to actions at the Scottish scale. Under Strategic Direction 4 some of the possible actions appear to relate to actions at UK and international scale. We would welcome clarification on this point.

In addition we would refer you to our answer given under **Q10**.  
*(Scottish Water considers that the National Marine Plan should set the framework for how marine litter reduction could be incorporated into regional marine plans. For organisations that operate at a national level, it can present problems where there are significant inconsistencies in requirements at a local level.*

*In terms of investment to meet legislative drivers, these would always have to be considered through the regulatory investment Quality & Standards process (Q&S), and there must be very clear evidence of an investment need that is proportionate to the benefit that will be derived).*

**Q23. Which do you believe is the most important possible action in helping to deliver the Marine Litter Strategy?**

We consider that prevention of litter rather than cleaning up is central to the strategy. Leadership by Marine Scotland will be important to convey messages regarding the safe and proper disposal or recovery of waste such that it does not present a litter risk.

**Q24. Can one or more of these possible actions be delivered under existing activities or do you think more action is needed under the Marine Litter Strategy?**

Scottish Water has no comment at this time.

**Q25. Do you think any of the existing actions need to be improved? If so, please provide details.**

Scottish Water has no comment at this time.

**Option for delivery**

**Q26. Do you think that Option 4 is the most appropriate mechanism for developing and improving policies under the Marine Litter Strategy?**

Yes  No

**Any other views on the options outlined or other options not identified are also invited.**

Scottish Water would wish to add that the process should engage all sectors and be adaptive.

**Equalities**

**Q27. Are there any equalities issues that should be factored into the Equalities Impact Assessment for the Marine Litter Strategy?**

Yes  No

Scottish Water has no comment at this time.

### **Strategic Environmental Assessment**

#### **Q28. Do you have any feedback on the findings of the Strategic Environmental Assessment?**

Yes  No

**Please note that some of the statements here pertain to both or either of Marine Litter Strategy and Towards a Litter Free Scotland Strategy.**

Scottish Water is keen to point out that disposal of litter into our systems should be controlled as a source point of litter entering the environment, and that this key link between the inappropriate disposal on land and the items appearing as Sewage Related Debris in the marine environment must be addressed.

Figure 2. & section 4.3.23.

Scottish Water would ask that waste disposed of inappropriately into Scottish Water's systems be included in the diagram.

Inappropriate sanitary items and other wastes illegally disposed to sewer contributes to the blockage of sewers and malfunction of mechanical and electrical parts e.g. pumps. This may result in pollution events including the release of sewage related debris.

It should be noted that the above also applies to Table 4. SEA topics *Water* and *Material Assets* and Table 5. SEA objectives *Material Assets*.

Section 4.3.10 & 4.3.15.

We wish to propose removing "(as it has not been subject to treatment)" from the text. The statement does not add a meaningful explanation for the following reasons:

1. Wastewater entering our systems may contain litter and great effort is taken to remove but not treat the litter to reduce bacteria or virus.
2. The wastewater is treated to various levels depending on drivers such as the sensitivity of the receiving waters.
3. Under storm conditions, or in emergency breakdown situations, wastewater that has not been subject to full treatment can be discharged to the environment and may contain sewage related debris.

Section 4.3.11.

We would welcome further discussion regarding the extent to which litter (and other inputs, such as fats, grease and oils; sometimes acting in combination) may block wastewater systems.

Section 6.4.5.

The microbial load in the marine environment from WWTW and systems must be considered in the context of the overall load from urban and rural diffuse solution. Extensive bathing water studies have demonstrated that non-Scottish Water sources present the principal risk to future bathing water compliance.

Section 6.4

Material Assets. We would again wish to reiterate the impacts to Scottish Water assets in terms of operational management and financial costs of dealing with the affects of litter inappropriately disposed of into the system. Litter and fats oils and grease entering the sewerage system can cause blockages leading to further spills or even flooding of properties and businesses.

### **Partial Business and Regulatory Impact Assessment (BRIA)**

**Q29. Are there any particular issues that you wish to highlight with regard to the partial BRIA, and the potential impacts on the third sector, business and the economy?**

Yes  No

We note that Scotland's draft Marine Litter Strategy will not of itself introduce any new regulatory burdens and that The Scottish Government will consult widely on any future regulations considered under the strategy with full Business Regulatory Impact Assessments produced as required.

In SR15 (Strategic Review 2015-2021) continued planned network and unsatisfactory intermittent discharge work to meet other environmental drivers will also be beneficial in reducing SRD.

### **General**

**Q30. Are there other issues that have not been highlighted in this consultation that you would like to mention?**

Yes  No

Scottish Water would be happy to continue to work with and support Marine Scotland in the development of the Strategy