

Implementing the Water Environment and Water Services (Scotland) Act 2003: Updating environmental standards for the water environment

1	Do you agree with the proposal in Section 4 to update the river fish statistical assessment method?
N/A	
2	Do you agree with the proposal in Section 5 to update the river phytobenthos assessment method?
N/A	
3	Do you agree with the proposal in Section 6 for a new loch fish (eDNA) assessment method?
<p>Yes</p> <p>Scottish Water supports the introduction of a more innovative and less intrusive methodology.</p>	
4	Do you agree with the proposal in Section 7 to update the loch morphology bank protection assessment method?
<p>N/A</p> <p>It is not clear from the consultation how this might affect Scottish Water assets. Therefore further information/clarification is sought.</p>	
5	Do you agree with the proposal in Section 8 to the introduction of spatial standards for fish barrier assessment?
<p>Yes</p> <p>This appears to have an immediate improvement on overall fish barrier classifications and will direct regulatory action/investment to priority waterbodies. The text does not provide enough detail to assess the impact on Scottish Water and we would welcome the opportunity to explore further. For example is the classification dependent on fish type and access for the whole lifecycle of fish and is the high-level GIS method to be used for screening and not as a basis for investment.</p>	
6	Do you agree with the proposal in Section 9.1 to update river flow standards to include artificially increased flows in high hydrological status waterbodies?
<p>Yes</p> <p>This seems an appropriate approach and from the evidence supplied it does not appear that it would impact Scottish Water activities in terms of water resources.</p>	

7	Do you agree with the proposal in Section 9.2 to update river flow standards to allow for short term flow deviation?
<p>Yes</p> <p>Will a separate new river flow standard be derived for ephemeral channels/extreme headwaters which naturally dry out in low flow periods? The existing river flow standards mean that the impact of abstraction and classification in small headwater catchments which naturally dry out to very low levels can be disproportionately extreme. In small headwater almost ephemeral channels, any size of abstraction will result in very large % of flow being removed resulting in the classification being poor or bad, even though the flow would naturally dry out.</p>	
8	Do you agree with the proposal in Section 10 for a new nitrogen standard for lochs?
<p>Yes</p> <p>Scottish Water supports the revision of Nitrogen standards in Lochs based on better evidence of the ecological effects and understanding of the interactions. Currently only a limited Total Nitrogen data set on Scottish Lochs is available on which to base these proposals. Therefore we would wish to see further monitoring and analysis to ensure that standards are meaningful and effective in supporting improvements to ecological status. It is assumed that the standards will be kept under review and updated should evidence become available suggesting that they can be improved.</p>	
9	Do you agree with the proposal in Section 11 to update the invasive non-native species list?
<p>Yes</p> <p>Scottish Water agrees with the proposals to update the INNS list in accordance with recommendations from UK Technical Advisory Group.</p> <p>We note that, where the adoption and application of these standards to make the improvements needed to achieve good status would be disproportionately expensive, appropriate alternative objectives will be set. We would wish to explore how this could be managed in practice, e.g. when the population of a high impact freshwater INNS cannot easily be managed so that it is not released to the wild and both control mechanisms and eradication can be shown to be financially prohibitive.</p>	



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