

[REDACTED]

From: [REDACTED]
Sent: 09 August 2021 08:30
To: [REDACTED]
Subject: RE: Hot issues - updates

[REDACTED], many thanks for this note and we'll carry on keeping a close eye on the SGP talks. Thanks for all the work on SW/SEPA. [REDACTED] trailed some of this with me on Friday too. We're evidently moving in the right direction. Shall we get 20 mins in the diary later today – do you want to find a slot. I'm interested in your views on blue/green infra limits and what we can do in this space including with ARE colleagues...

[REDACTED]

From: [REDACTED]
Sent: 08 August 2021 11:15
To: [REDACTED]
Subject: Hot issues - updates

Water scarcity.

The situation has improved slightly across the country generally due to rainfall in the last week, although some farmers in Galloway are still seriously affected. Ministers were briefed on Friday. SEPA has issued a press release which has been picked up by the Scotsman.

[SEPA helps businesses across Scotland as significant water scarcity continues to affect areas despite flooding | The Scotsman](#)

Aquaculture.

Wording agreed for PfG and SGP agreement text which reflects our interests. I continue to work with [REDACTED] on the text for the SG response to the Salmon Interactions Working Group (SIWG) recommendations – this will announce that SEPA will take forward the sea lice spatial framework. Draft to be circulated for Aquaculture Directors meeting on 11 August; and to be published early September. Key recommendation outstanding is introduction of fines for escapes – the SIWG recommended that should be done through CAR but legally it's not that simple so the SG response will simply commit to undertaking work to introduce fines (as using Fish Health legislation may be better option). We will continue to collaborate on this.

Scottish Water

I had various discussions with both SEPA and [REDACTED] last week.

- SEPA feedback – [REDACTED] raised the matter with [REDACTED] and that has been fed back. [REDACTED] has also discussed with [REDACTED], who has made 3 key points – sewage debris should not be entering rivers; more SW monitoring of CSOs must be done to identify the scale of the problem; but it needs to be understood that CSOs will continue to spill as they are relief valves. I understand SEPA and SW will request a meeting with Directors on this. SEPA/ SW meeting this Tuesday – I've suggested a joint letter outlining early thinking on taking this forward certain key actions would be helpful to show both bodies are taking this seriously (and more useful than the previous SEPA letter)
- My general impression is that while there is an increasing recognition that something has to give, there are different views within SEPA on this - operational staff are pleased we are pushing this as they've been trying for years to get traction, but there is some wariness at

senior levels within SEPA about taking forward CAR licence reviews in bulk as that might be interpreted that SEPA regulatory action to date has not been as robust as it might have been(!)

- [REDACTED] feedback – further to our discussions on his draft text [REDACTED] is now clear that protecting Scottish Waters investment programme is not the aim, and he understands we need for sensible options for Ministers. He has raised with SW, and has also raised this matter with his own Director. I'm told they are minded to have Ministers instruct SW to bring forward a detailed explanation of current plans and proposals in relation to the delivery of their RBMP obligations. Plans would be expected to include detailed information on capital works required across a range of actions not only in relation to planned upgrades of assets responsible for unsatisfactory intermittent discharges (including sub-standard CSOs) but also the expected contributions that sewer management policy and innovations in blue-green infrastructure such as surface water attenuation interventions, green roofs, better use of porous surfaces, swales etc can make. There are also plans to put advice to Ministers seeking a ban on plastic in wet wipes.
- I sense definite movement but I think some of this needs a reality check. Banning plastic may make wet wipes biodegradable in the long term and campaigns may help reduce a small proportion of but many people will still put wet wipes etc down the toilet because it's human nature to take the easy option, so I don't believe we're going to see a seismic shift in the overall volume of sewage debris. The blue-green interventions sound great in theory – but there are some fundamental questions – if water is kept out of sewers where does it go. We need vast areas of land to store it, and Scotland's flat land is generally cultivated or built upon. In cities, there may be some brownfield sites that could be utilised. But in Edinburgh for instance, there is a dearth of potential storage space – do we just let the water flow down the streets and turn Princes Street Gardens and the New Town back into lochs? And green roofs are very heavy, you can't just retrofit them onto existing housing stock. Having lived through the "let's do catchment management" debate, I'm pretty sceptical about these grand visions without any realistic plan for getting there.
- Next steps - [REDACTED] is back this week and I will pick up with her too. We should also get feedback from Tuesdays meeting. Do we need to pick up with [REDACTED]? I copied the draft to [REDACTED] with the legal questions, but this is already at Director level. .

[REDACTED]

[REDACTED] – Environmental Quality and Circular Economy Division
Currently working from home – [REDACTED]