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Dear Mark

Scottish Water's response to Recommendations within the report *'Storm Overflows - An assessment of spills, their impact on the water environment and the effectiveness of legislation and policy'*

Scottish Water welcomes the opportunity to respond to the recommendations in the Storm Overflows report.

ESS Recommendation 1

The Scottish Government, Scottish Water and SEPA must make data in relation to waste water spills, compliance with licences and environmental pollution incidents available to the public to provide a comprehensive and accessible picture of the scale of spills from storm overflows. This should include reporting where and when discharges occur, their scale and the reasons for any discharges, as well as more details on when these result in pollution incidents covering the source, reasons and links to licence compliance.

Scottish Water is committed to making more sewer overflow event data available to the public. Our Improving Urban Waters (IUW) Routemap (Improving Urban Waters - Route Map) set out commitments on installing 1,000 new overflow Event Duration Monitors (EDMs) and on publishing data on both a near real time and annual basis. We have delivered against these commitments.

Our view is that routine overflow events do not represent Environmental Pollution Incidents (EPIs) and that it is important that this is understood by customers and other stakeholders. However, overflow locations can represent a pathway to the environment in the event of asset failure and we are considering how best to publish data (which is already in our annual return to WICS) to identify where EPIs are associated with overflow discharge locations.

Assessing the reasons for overflow events and overflow licence compliance is complex and we are currently developing our approaches through the creation of processes, methodologies and guidance which will require agreement with SEPA. We would envisage that SEPA would plan to publish overflow licence compliance data through their forthcoming Environmental Performance Assessment Scheme (EPAS) when this becomes available.

ESS Recommendation 2

Scottish Water must complete installation of, and publish all data from, the more comprehensive network of monitors set out in its 'Improving Urban Waters Routemap'. It should conduct and publish the results of targeted monitoring to assess the accuracy of predicted spill rates from its hydraulic modelling and in response to locations where environmental pollution incidents have occurred. In addition, monitors should be installed at all locations where storm overflows have been assessed as unsatisfactory and it should ensure that monitors are installed and operational wherever required by licence.

We completed the installation of 1,000 new EDMs in November 2024 and, working with stakeholder partners, developed and then published our near real time overflow map in December 2024 (Overflow Map - Scottish Water). The overflow map has been widely welcomed, currently includes near real time information from over 1,100 overflow locations and we are continuing quality assurance work which will allow us to onboard more EDMs. Since publication of our IUW routemap, we have increased the coverage of annual overflow event data and will continue to expand this dataset in March each year as information from new EDMs becomes available.

We are currently completing the installation and onboarding of EDMs where these are already required by licence and anticipate these being deployed and included within the overflow map by the end of March 2025. EDMs cover the significant majority of overflow locations assessed as being 'unsatisfactory' (UIDs) and the overflow map identifies these through the associated planned investment priority tagged to each location.

Through our emerging intelligent wastewater network (WWIN) capability, we will develop plans to integrate live overflow event information with our existing hydraulic modelling tools which will improve confidence in the assessment of UIDs and support design development and investment decision-making. We anticipate that our WWIN capability will allow us to proactively identify EPI risk and we already have examples of where we have been able to respond to emerging risk and prevent EPIs from occurring.

ESS Recommendation 5

Scottish Water and SEPA should more routinely assess available rainfall, flow and spill event data to identify all instances of overflows which appear to spill in dry weather and prioritise these for investigation and improvement as soon as possible

Scottish Water agrees that overflows should not normally operate during dry weather and that there should be sufficient hydraulic capacity within the system to ensure dry weather flow can be properly contained, conveyed and treated. Where discharges have been observed during dry weather periods, these have been prioritised (Prioritisation of Sewer Overflows in Scotland - Scottish Water) for further investigation and improvement and we would envisage that this will continue. We will work with SEPA to develop the definition of dry weather operation for overflows, recognising the complexity of catchment response to rainfall events.

We plan to develop the capability to identify '*chronic*' dry weather spills remotely linking overflow event and rainfall data using our maturing intelligent wastewater network capability. This will allow is to verify whether 'dry weather' overflow events are occurring due to a lack of hydraulic capacity or whether service is being compromised due to blockage formation, collapse or failure of equipment.

ESS Recommendation 6

Scottish Water should publish a comprehensive and accessible plan for all proposed [UID] improvement work specifying: (1) the locations of all these storm overflows; (2) the timetable when improvement work will take place; and (3) if the timetable for work has not been finalised, specify when a decision on whether to proceed will be made.

Our current commitment to improving UIDs is set out within our Improving Urban Waters Routemap which is published on our website. Working with SEPA, we have prioritised all the UIDs which we identified through environmental study work as either High, Medium and Low Priority using an agreed approach which we have also published (Prioritisation of Sewer Overflows in Scotland - Scottish Water). On the overflow map, we have also linked overflow locations to our current investment priorities.

We recognise that having a pipeline of UID solution development activity is important. However, we cannot be more specific about the next priorities for UID improvements until we have completed the Strategic Review of Charges 2027 – 2033 process which requires a new set of Ministerial Objectives and also Final Determination of our business plan by the Water Industry Commission for Scotland.

I trust that these responses are helpful and set out our ongoing commitment to ensuring improved transparency of our performance and intention to protect and enhance the environment through continuing collaboration with key stakeholders.

Yours sincerely

[redacted]

Simon Parsons
Director of Environment, Planning and Assurance