

Case ID: IESS.21.015

Description: Third review of SEPA's progress in implementing its barrier removal programme

Background

During Environmental Standards Scotland's (ESS') pre-investigation work on the licencing of barriers in Scottish rivers, the Scottish Environment Protection Agency (SEPA) provided an implementation plan, staged across five years to 2027, indicating how barrier removal or easement of river structures would take place. The plan was developed in early 2022 by SEPA in accordance with Scotland's Third River Basin Management Plan, which the Scottish Government laid in the Scottish Parliament in December 2021. ESS' decided to monitor and engage with SEPA on its implementation of the various stages of the plan.

ESS' first review of progress in March 2023 found that SEPA's implementation programme was largely on track. ESS' second review of progress showed that despite an increase in the number of barriers identified by SEPA, implementation of the programme was satisfactory. This update sets out SEPA's progress against the plan between March 2024 and April 2025.

This update should be read in conjunction with previous briefings which can be found at: [Licencing and Removal of Weirs Summary Report - Environmental Standards Scotland](#), [Licencing and Removal of Weirs - May 20 23 Progress Update - Environmental Standards Scotland](#) and [Licencing and Removal of Weirs - Progress Update September 2024 - Environmental Standards Scotland](#)

Assessment outcome

The following table sets out SEPA's planned activity for year 2024/2025 and what was delivered. The planned activity and current status represent the numbers of barriers SEPA planned to have at each stage in April 2025 and the actual numbers at that stage. The planned activity figures are derived from the revised implementation plan received in 2024 with additionally identified barriers.

Throughout the implementation plan period, a significant number of additional barriers have been identified by SEPA. In 2023/24, SEPA identified an extra 104 barriers, and in 2024/25 an additional 26 barriers were found to exist. The total number of barriers included in the plan as of April 2025 is 374, which represents an increase of over 50% to those barriers originally identified as requiring licensing or removal.

Stage	Planned activity	Current status (April 2025)
Stage 0 no action	137	134
Stage 1 screening	0	93
Stage 2 licensing and design	146	117
Stage 3 build	34	4
Stage 4 completed	31	26
TOTAL	348	374

SEPA has advised ESS that a further 14 barriers had been identified between April 2025 and June 2025. Activity in respect of these barriers will be included in the April 2026 update.

Conclusion

From the information supplied it appears that SEPA is continuing to progress the programme, whilst continuing to integrate newly identified barriers into it. Despite good progress, delivery is behind the plan at most stages.

It is noted that according to the original programme, Stage 1 screenings should have been completed by April 2025. However, the data supplied by SEPA indicates 93 screenings are ongoing. This reflects the additional numbers of barriers identified after the programme commenced.

ESS notes the significant gap in the number of barriers planned to be at the build phase (Stage 3) and the number reported by SEPA to be at this stage. This may restrict SEPA's ability to achieve the planned number of barriers due to be completed (stage 4) by April 2026.

SEPA planned for 31 barrier projects to be completed (Stage 4) by April 2025. 26 barriers have been completed.

ESS will seek an update on SEPA's progress against the programme again in April 2026 and will report in due course.