

Mark Roberts
Chief Executive
Environmental Standards Scotland
Ìrean Àrainneachdail na h-Alba

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Alex Flucker
Chief Operating Officer
SEPA
By email

05 November 2025

Dear Alex,

Storm Overflows – an assessment of spills, their impact on the water environment and the effectiveness of legislation and policy

Thank you for your letter of 1 September 2025 providing an update on action being taken by SEPA in response to the recommendations in our report on storm overflows. I welcome your ongoing engagement with ESS and your work with Scottish Water to address the concerns and recommendations made in our report.

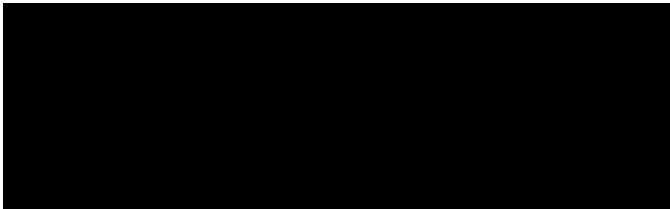
I was grateful for your update on the action being taken, in response to Recommendation 1, to make more information on wastewater spills, compliance with licences and environmental pollution incidents available to the public. Your ongoing commitment, with Scottish Water, to making more up to date information on performance, including from PFI assets, is welcome. ESS acknowledges that the development of the Environmental Performance Assessment Scheme is a significant undertaking and we look forward to further updates on proposals and timelines for implementation in due course.

I was particularly pleased to hear about your work with Scottish Water, in response to recommendation 5 in our report, to develop analytical tools to identify instances where overflows may be spilling in dry weather. This is an important development

and will help to identify those instances where spills are likely to have a more significant impact on the environment and to inform follow-up work to verify performance and prioritise unsatisfactory overflows for improvement.

I look forward to receiving further updates from you and Scottish Water in March 2026 on progress with implementation of the dry weather analytical tool and action to address the other recommendations in our report.

Yours sincerely,



Mark Roberts
Chief Executive