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Dear Mark

Storm Overflows – An Assessment of Spills

As promised in my letter of 01 September 2025, I am pleased to provide a further update on progress against the recommendations for Scottish Water within the *Storm Overflows – An Assessment of Spills* report.

Recommendation 1

We have been continuing to deploy new event duration monitors (EDMs) and currently have 2,352 installed, with 1,624 EDMs represented on the near real time overflow map (28 February) (Overflow Map - Scottish Water. The remaining EDM locations will be added to the overflow map following a period of data validation and we are on track to have at least 2,000 EDMs represented on the map before the 2026 bathing water season.

We added information on environmental pollution incidents (EPIs) to our website last year, identifying where these occurred at storm overflows and will update this information when our annual report is published later this year.

Recommendation 2

We are installing EDMs at locations with unsatisfactory intermittent discharges (UIDs).

Currently there are 678 UID locations with EDMs installed and, of these, 487 are currently visible on our overflow map. The remaining sites will be added following data validation.

There are 128 UID locations where we have not yet deployed an EDM and we are reviewing these to clarify status and to resolve more complex installation requirements. We will cover all verified UIDs with monitors before April 2027.

We committed to provide you with more details on the advancement and development of Wastewater Intelligent Networks (WWIN), we have:

- Gone 'live' with release 2 of our EDM Overflow Portal in October 2025. In addition to minor functionality and user experience updates, additional map features include:

    - Representation of Bathing Water locations
    - Representation of dynamic rainfall data
    - Location cards with static rainfall statistics

- Deployed over 900 Sewer Level Monitors (SLM) that allow us to detect abnormal flow levels and identify operational issues within the sewer network. We plan to have 1,000 Sewer Level Monitors in place by April 2026.

- Extended WWIN equipment coverage through EDM and SLM deployment from the original 4 pilot catchments to 16 catchments.

- Continuing to progress several 'proof of concepts' to assist in development of our WWIN Routemap:

    - A pilot of smart cameras to detect flooding has been completed. Further rollout has been paused due to vandalism and theft of equipment. Equipment has also been found to be difficult to instal and not robust enough to deliver the benefits anticipated.
    - A pilot using enhanced artificial intelligence blockage detection to support our operational response is ongoing.
    - A pilot to integrate hydraulic modelling to assess correlation between modelled prediction and observed EDM data will start in 2026.
    - Our blockage detection and enhanced catchment performance analysis pilot is planned to begin in May 2026.

The WWIN Routemap will be included as part of an updated Improving Urban Waters Routemap which will be published at the end of 2026.

Recommendation 5

SEPA has agreed in principle with our proposed definition to describe Dry Day Overflow Events and we will work further with them to develop the approach to investigation of dry day overflow events, agreement of response activities and associated timelines to ensure alignment with their proposed Environmental Performance Assessment Scheme.

We continue to use WWIN insights to investigate situations where data suggests that overflow events could be occurring in the absence of rainfall.

Recommendation 6

By December 2027, our current programme indicates that we will deliver 97 UID outputs, made up of 60 of the original 108 high priority UIDs and 37 alternate high and medium priority UID needs. The remaining original high priority UIDs will deliver beyond January 2028 and are included within our SR27 Final Business Plan which was submitted to the

Water Industry Commission for Scotland (WICS) at the end of February 2026.

The list of UID outputs scheduled before December 2027 and those original high priority UIDs which will be delivered beyond January 2028 has been published on our website at UID Delivery Schedule.

If you have further questions or feedback on this update, please don't hesitate to get in touch.

Yours sincerely

Simon Parsons
Director of Environment, Planning and Assurance

Appendix 1 - Dry Day Overflow Event Definition

Our proposal is to adopt the English and Welsh definition of a dry day spill: as set out below.

English and Welsh Definition

In England (Environment Agency) and Wales (Natural Resources Wales) a dry day spill is defined as:

"***A dry day spill is when a storm overflow is used on a 'dry day' – which is defined as no rainfall above 0.25mm on that day and the preceding 24 hours.***"

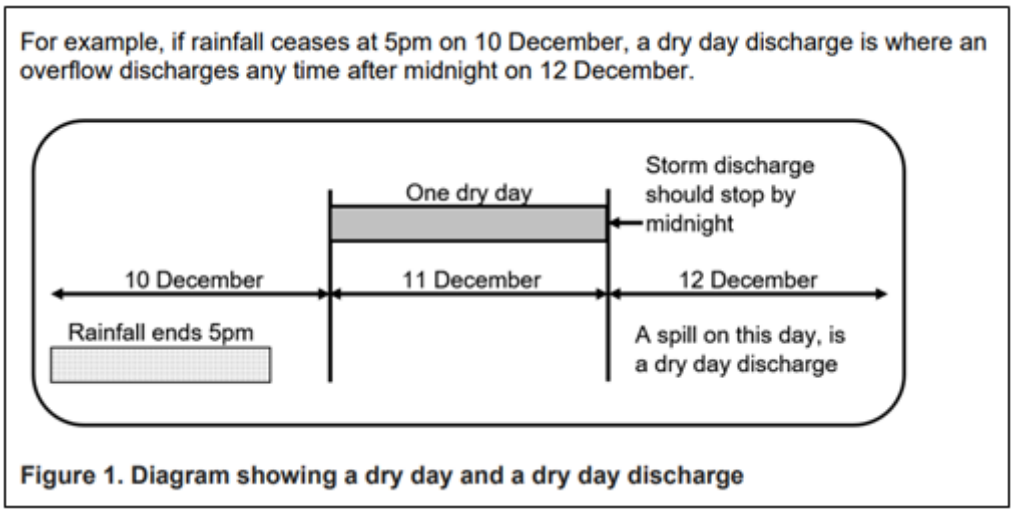

Figure 1: Extract from GN066 - How to classify storm overflow performance, Natural Resources Wales

A discussion document, setting out this proposal and some of the risks, issues and approaches to mitigating these has been shared with SEPA. The main risks identified are around the reliability of rain gauge information and the nature of how some catchments work, particularly those with very long drain down times.