

**WAT-PS-10, on Assigning Groundwater Assessment Criteria for  
Pollutant Inputs  
March 2021**

Overview

*General Comments*

This consultation covers environmental standards for substances that can affect groundwater. This is a comprehensive and informative document and has been read in conjunction with the Scottish Government Protecting Scotland's Groundwater's from pollution document.

Detailed Response

**Specific Comments**

<b>4</b>	<b>Annex 1 sets out the background to the standards. We have not significantly changed the approach set out in section A1.4 “What is an input and a discharge?” from our previous version of this guidance. This is because we think it works well. Do you agree that no changes are required?</b>
Yes, Scottish Water agrees that the previous version is clear and comprehensive and that no changes are required.	
<b>5</b>	<b>Section A1.5 sets out how compliance and assessments points can differ. This reflects the current guidance. Do you agree that we should continue to set out how assessment and compliance points differ in this way?</b>
Yes, Scottish Water agrees that this is a good approach which should be continued as it may not be practical to monitor at the assessment point; and also that early warning of pollution may be needed.	
<b>6</b>	<b>Section A1.7 sets out the basis for the threshold values. The Scottish Government consultation asks if you agree with the approach to assess pollution using threshold values. In this consultation we are asking if you agree with the hierarchy set out to decide which value to use?</b>
Scottish Water has no comment.	
<b>7</b>	<b>Annex 2 sets out the groundwater standards concentrations. A list of standards for common substances is linked from A2.1. Do you think the layout of this table is clear?</b>
Yes, the table layout is clear.	
<b>8</b>	<b>Do you think there is any information missing from the list of standards for common substances?</b>

Scottish Water has no comment.	
<b>9</b>	<b><i>We have not set out a generic temperature standard for groundwater. Instead we propose that the temperature in groundwater must not be high or low enough to cause adverse direct or indirect impacts in groundwater-dependent receptors including surface waters, wetlands or abstractions. Do you agree with this approach?</i></b>
We do agree that this approach is reasonable as it may not be practical or possible to determine a standard for temperature. The main concern is that water users and receptors are protected.	
We would also wish to raise a question; would it be practical to set a target/control based on how much the groundwater temperature varies from its natural temperature range?	
<b>10</b>	<b>The Scottish Government consultation asks if you agree with the proposed changes to the standards. Does Table 1 set out the standards clearly?</b>
Yes, Scottish Water agrees with the proposed changes to the standards and that the table sets these out clearly.	
<b>11</b>	<b>Do you agree with our tier-based system to assessing impact?</b>
Yes, Scottish Water agrees that this approach is appropriate.	
<b>12</b>	<b><i>Section A.3.1.5. sets out guidance on calculating annual average concentrations. Do you agree with our approach to dealing with limits of detection?</i></b>
Yes, Scottish Water agrees with this approach.	
<b>13</b>	<b><i>Section A.3.1.5. sets out guidance on calculating annual average concentrations. We have not specified a minimum number of data points. Do you agree with this approach?</i></b>
Yes, Scottish Water agrees with this approach.	
<b>14</b>	<b><i>Section A3.3.1 sets out how to calculate input loading. Do you agree with our approach to assessing source input loading rates where the source is below the water table?</i></b>
Yes, Scottish Water agrees with this approach.	
<b>15</b>	<b><i>Section A3.3.3 sets out guidance on assessing the impact on the future groundwater resource. We have set out equivalent assessment point distances for the future groundwater resource. Do you think these tables are useful?</i></b>
Yes, Scottish Water believes the tables are useful.	
<b>16</b>	<b><i>Section A3.3.3 sets out guidance on assessing the impact on the future groundwater resource. We have set out equivalent assessment point distances for the future groundwater resource. Do you agree with our upper limits to equivalent assessment point distances?</i></b>

Scottish Water has no comment.	
<b>17</b>	<b>A3.3.4, A3.3.5 and A3.3.6 set out how to assess the impact on surface waters, GWDTE and abstractions. This approach has not significantly changed to that set out in current guidance. Do you agree that no changes are required?</b>
Scottish Water agrees that the existing approach for assessment of impacts on surface water and abstractions seem appropriate. NB - We have no comment on GWDTE (Groundwater Dependant Terrestrial Ecosystems)	
<b>18</b>	<b>We have tried to outline the circumstances when exemptions from meeting the objectives apply in table 2. Do you agree with our guidance?</b>
Yes, Scottish Water agrees with the guidance.	
<b>19</b>	<b>Reading the document and annexes as a whole, do you find it clear and is there sufficient information for you to make an assessment?</b>
Yes, Scottish Water found the document to be very informative. It contains a lot of detail on the specifics and the approach, providing sufficient information to undertake an assessment.	



- End of Document -