

Water Resources Management Plan

Overview

General Comments

We welcome this opportunity to comment on SEPA's Water Resource Management Plan (the Plan) for a planned and proactive approach to water resources management.

We agree with SEPA's description of what successful water management would look like which focuses on the stresses on water resources being understood by all, water being used wisely and efficiently and water users understanding the value of water. This supports an objective from the Water Sector Vision which is to inspire Scotland's people to love their water and only use what they need.

Working in Collaboration will contribute to achievement of the objectives of the Plan

In order to achieve a water efficient Scotland, Scottish Water (SW), SEPA, licensed providers and businesses need to work together so that all water users (including householders) are provided with the information and knowledge and therefore the motivation to bring about behavioural change needed across the country.

We recognise that SEPA have directed this Water Resource Management Plan Consultation to businesses who are direct water abstractors and over whom SEPA have regulatory control via the CAR licensing system. Certain aspects of the Plan omit actions for businesses served by Scottish Water's network, communities and householders and our responses below reflect this assumption (note, the Plan would benefit from distinguishing between water abstractors and water users).

We jointly chair the Water Efficiency Stakeholder Group with the Scottish Government, bringing together stakeholders including SEPA, WICS, Citizens Advice Scotland, Nature Scotland and Waterwise to work in partnership to create a water efficient Scotland. This forum could play a key role in ensuring this SEPA Water Resource Management Plan delivers against its objectives. The focus is on informing and enabling people and business in Scotland to make water efficient decisions resulting in reduced consumption and improved environmental sustainability.

We are also pleased to be working with SEPA on One Planet Choices framework where decision making at catchment scale with participation of all relevant stakeholders can help us achieve the water sectors outcomes of net zero, circular economy and support a flourishing Scotland. This framework will be a useful tool in reducing overall water demand in Scotland, including communities and householders, and will contribute towards delivering the pillars in this Plan.

How Scottish Water's water resource management aligns with the Plan

At Scottish Water, our approach to sustainable water resource management is a proactive one which includes planning to secure a continuous and safe supply of

drinking water for our customers whilst supporting economic growth and protecting the environment. Our water resource planning looks 25 years ahead to ensure an ongoing balance between water resource availability, our abstraction licences, and the changing demands for water. This work also takes account of climate change scenarios and identifies investment needs to secure and/or increase resilience when and where required.

We have also developed drought management plans, which we use to ensure the ongoing supply of drinking water to our customers during drought conditions. These plans incorporate all-year round monitoring which ensures that we take appropriate actions early enough to maintain supply, with no detriment to the environment, during periods of dry weather.

Water efficiency is one of the ways in which SW will ensure that there is sufficient availability of source water that can be treated and supplied to our customers both now and in the future, even during more extreme droughts. Reducing the demand for water is also part of Scottish Water's road map to going beyond net zero by 2040.

We continue to develop our Water Efficiency strategy and have set out on a path to drive reductions in water use. We therefore support the aims of this Plan for water efficiency to compliment the work we are doing. We would welcome the opportunity for collaboration and coordination.

We have been working in partnership with Home Energy Scotland to join up water and energy efficiency messaging for customers. We also have a suite of materials using the theme of valuing water and why it is important to use water efficiently in Scotland. Our current campaign is built around engaging with customers to use water efficiently to protect future water supplies, keep more water in the natural environment and contribute to Scotland's ambitions for net zero emissions

Overall, we believe that the actions in this consultation can support us to achieve our own Strategic Plan ambitions while meeting the SEPA Plan's overall objective of ***working to protect and enhance Scotland's environment, helping communities and businesses thrive within the resources of our planet.***

¹ 'SW's Strategic Plan: <https://www.scottishwater.co.uk/help-and-resources/document-hub/key-publications/strategic-plan>

Detailed Response

4	<p>Do you agree with the actions proposed to facilitate responsible and efficient water use? Short term actions: Yes/Not sure/No. Medium term actions: Yes/Not sure/No</p>
<p>Short term Actions: Yes. We would welcome these direct actions however the document would benefit from more clarity on how these high-level statements would translate into tangible actions that will deliver the pillars.</p>	

Medium term Actions: Not sure. More detail on how the support will be offered to businesses is needed to understand how these high-level statements would translate into actions.

The actions are targeted to direct abstractors (excluding businesses served by Scottish Water’s network, communities, and householders). The Plan would benefit from distinguishing between water abstractors and water users.

Actions to achieve responsible and efficient water use have to start with communications for all customers (business and domestic) to understand the value of water and the wider benefits of using less, and an action plan to achieve the conversion to a water efficient Scotland.

5	Which of the following options best describes the scale and urgency of these actions to meet the challenge of resilience to water scarcity? Scale of Actions: Insufficient/Adequate/Ambitious. Urgency of Actions: Very urgent/ urgent/not that urgent.
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Scale of Actions: Insufficient
Urgency of Actions: Very urgent

The pillars of a water efficient Scotland by 2025 (users are water-efficient, businesses optimise their abstraction and businesses are adapting to the future) are ambitious and actions are needed. However, it is not clear that the actions as described at this high-level will deliver the pillars particularly in the timescale and across the country.

6	Outline any other actions you believe are necessary to help businesses achieve responsible and efficient water use indicating, whether they should be achieved in the short or medium term
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Scottish Water’s Strategic Plan recognises the critical contribution we play in ensuring there is sufficient availability of source water that can be treated for supply to our customers, even during extreme droughts. We will continue to work with SEPA to identify opportunities to collaborate with other sectors, for example using SEPA’s One Planet Choice framework, to achieve sustainable water resource management goals and increase drought resilience.

The Plan would benefit from taking a more holistic approach to water management. This could not only include droughts but also the role of water efficiency in managing surface water and flooding as well as reducing carbon as part of the Hydro Nation agenda.

The Plan would benefit from actions to support business who have not yet considered water management as a priority or are not in the position to respond to these future challenges within the desired timescales, for example if they result in large investment or carbon impacts.

7	Do you agree with the actions proposed to improve our regulatory approach in the short and medium term? Yes/Unsure/No
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<p>Short-term actions: Yes</p> <p>It is clear from the supplementary document that accompanies the Plan, that public water supplies and thus SW is exempt from the proposed drought condition criteria so would have no direct impact.</p> <p>However, the introduction of a new licence condition for business abstractors during prolonged low flows would not be applicable for businesses who take their supply from Scottish Water which may be considered unfair by direct business abstractors. We would support licensed providers and business users working together with SEPA and SW to move to water efficient practices for drought resilience and would welcome the opportunity to discuss this further with SEPA.</p> <p>Medium-term actions: Yes. Greater detail is needed on how the five-year medium actions would deliver the 2025 regulatory regime outcomes (users take responsibility to manage their resources, the regulatory approach promotes flexible water use and Scotland’s water policy supports drought resilience) on the ground.</p>	
8	<p>Which of the following options best describes the scale and urgency of these actions? Scale of Actions: Insufficient/Adequate/Ambitious. Urgency of Actions: Very urgent/ urgent/not that urgent.</p>
<p>Scale of Actions: Ambitious. Urgency of Actions: Urgent</p> <p>We agree that the actions are ambitious in the 2025 timescale but are unsure if they are sufficient to meet 2025 regulatory regime outcomes. We would suggest that the medium term action of exploring how our charging scheme can further encourage more sustainable use of water should be changed to short-term action to be able to deliver the pillar of “ all licensed abstractors proactively managing their water use by 2025 “</p>	
9	<p>We need everybody to be able to comply with the new drought condition. What support would help you manage the resource and comply with the condition?</p>
<p>It is clear from the supporting document that SW public water supply abstractions are exempt from this new drought condition, so we have no comment on this.</p> <p>However, of the supporting options provided, providing real-time flow information via SEPA’s website would be a welcomed development as it would support improvement of drought management, as would communication of the forecast water scarcity level in Scotland.</p>	
10	<p>We are aware that informal water sharing and the practice of artificially increasing river flows (where groundwater or water from off-line storage is fed into rivers for re-abstraction downstream) already takes place to prolong the available resource. What else could be done to facilitate such good practice?</p>
<p>Better visibility of all water users and their proportional water use within a catchment to facilitate and share good practices and to understand where the pressures are coming from. This would enable users to understand their contribution to pressures in a catchment and to prioritise their water efficiency initiatives. We would be pleased to work with SEPA and</p>	

other water users within our catchments but would look to SEPA to enable and facilitate, as well as encourage, these relationships and the process.

11	We want to better understand what barriers are stopping adaptation both in the short and medium term and work together to reduce these. Choose all that you consider a barrier: regulatory/financial/technological/uncertainty of impacts of climate change/ understanding the benefits of adapting/other.
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Financial: cost (and potentially carbon) impact of data capture in some of our more remote sites.

Technology: remote sites prove challenging to monitor and capture data reliably.

Uncertainty of impacts of climate change: There is recognised uncertainty in the science and the timing of impacts and therefore on the evidence we use to plan future sustainable and resilient supplies for our customers whilst protecting the environment. There will be considerable challenges for businesses to identify when to invest for mitigation against climate change.

Understanding the benefit of adapting: A key barrier to achieving resilient water resource management in Scotland is the widespread perception of a country with an abundance of water and that adoption of water efficiency is not an essential practice.

12	Do you agree with the actions proposed to facilitate effective communication and engagement? Short term actions: Yes/Not sure/No. Medium term actions: Yes/Not sure/No
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Short-term actions: Yes
Medium-term actions: Yes

We are fully supportive of the *Effective communication and engagement* theme. We agree that effective communication between SEPA and all abstractors is key to the successful management of water resources across the whole catchment and will provide opportunities for improved drought resilience.

The actions for this theme relate to SEPA providing information to users, but there would also be benefit in including an action to listen to abstractors to learn what they understand of water efficiency and the barriers they face to reducing or changing their water consumption patterns (in detail beyond this consultation) as a baseline.

In the context of this consultation (SEPA's ambition to facilitate effective communication with businesses within their Regulator regime), we would be pleased to work with SEPA and other water users, in particular within sensitive catchments, but would look for SEPA to enable and facilitate as well as encourage these relationships.

13	Which of the following options best describes the scale and urgency of these actions? Scale of Actions: Insufficient/Adequate/Ambitious. Urgency of Actions: Very urgent/ urgent/not that urgent.
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Scale of Actions: Insufficient

Urgency of Actions: Very urgent

The desired outcomes for a change in mindset so that water is valued, the impacts of climate change are well understood, and users and communities work together, are very ambitious to achieve by 2025. However, it is not clear that the actions as described at this high-level will deliver this on the ground, particularly in the timescale and across the country.

14

We already use a range of methods to communicate during water scarcity periods (e.g. website, weekly reports, direct e-mails, trade associations, social media, media campaigns). Which of these do you find most useful and what other methods would be helpful?

Scottish Water refers to the SEPA water scarcity reports during drought incidents.

For the Plan, a common platform for all to access would be beneficial – including direct abstractors, businesses, industry, the media, and the public, delivering a consistent message. To be more effective, this would be all year round and build upon a campaign to transform the nation to one where it is considered essential that water is valued and conserved.

15

Use the box below to outline any other actions you believe are necessary to facilitate effective communication and engagement indicating whether they should be achieved in the short or medium term.

We agree with the three goals in this section. The Plan must be clear on actions that are focussed on direct abstractors and where it extends to Scotland as a whole, ie including individuals, communities, other businesses and interest/stakeholder groups.

In the 'Water is valued' pillar section it refers to - "mindset to change to understand that water is a valuable resource and not always available in right place at the right time". One of the sub-groups of the Water Efficiency Stakeholder Group is focused on effective communication with a purpose to ensure we have a common and united voice across Scotland to promote water efficiency and reduce water wastage. Actions from the communications sub-group that are also relevant to this Plan include:

- Ensure consistent and co-ordinated messaging
- Ensure messages appropriate for different types of water users
- Increase customer understanding of water environment and water use
- Changes customer behaviour towards water use

Communities can mean people with a similar interest (gardeners) or relate to people within the same geographical location (within the same catchment). Effective communication and engagement strategies will need to reach both.

It should be noted that investment by businesses to move water around or reduce the water abstracted to increase drought resilience could potentially come at a large cost financially, environmentally and in terms of carbon.

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