

28 May 2020



Mr D McGillivray
Deputy Director
Environment and Forestry Directorate
Environmental Quality and Circular Economy
Division
Victoria Quay
Edinburgh
EH6 6QQ
E: eqce@gov.scot

Castle House
6 Castle Drive
Carnegie Campus
Dunfermline
KY11 8GG

Customer Helpline
T: 0800 0 778 778
W: www.scottishwater.co.uk
E: Regulation@scottishwater.co.uk

Dear Mr McGillivray,

Consultation on determining the 2020 bathing season in light of the on-going COVID-19 pandemic

Scottish Water welcomes the opportunity to comment on the above consultation paper.

In response to the question posed in the consultation:-

Do you agree with the proposal to postpone the determination of the period of the bathing season for 2020 and of the designation of any bathing waters, in light of the on-going COVID-19 pandemic, and keep the matter under review throughout the summer months in line with the Scottish Government's COVID-19 framework for decision making?

Scottish Water agrees with the above proposals, recognising the exceptional circumstances of the current COVID-19 situation.

Scottish Water assets have the potential to impact 73 of Scotland's 86 bathing waters. The majority of our assets are designed to meet the appropriate standards and, provided that these assets operate as planned, will help support achieving the *sufficient* standard required under the current directive.

To ensure that our assets are capable of operating as planned, we employ an enhanced inspection regime covering those which could have the most significant impact on bathing waters, with around 430 pre-season inspections taking place over March and April each year. This year, our network of bathing water champions and operations staff were unable to complete the inspection programme before lockdown in late March, with around 130 inspections still to be completed. Around 50 improvement actions were identified through the inspections undertaken and some of these were not completed before lockdown.

We estimate that we would require around 3 weeks to complete pre-season inspections and a further 2 - 3 weeks to complete all of the actions arising, presuming that these could be completed in line with current Government guidance and in a way that would not pose further risk to bathing water performance.

We have 14 wastewater treatment works where we have seasonal or year-round license standards designed to protect bathing waters. We have reviewed each of these assets and are able to confirm that these should be capable of meeting license requirements and therefore provide the expected level of protection to the bathing waters nearby in 2020.

As Scotland's communities and industry look to move beyond the current lockdown restrictions, there will be a period of significant readjustment for Scottish Water until more normal conditions are sustained. Our supporting supply chain will continue to ramp back up to full capacity. However, this readjustment period will continue to be a pressurised time for our operational resource, with the potential for elevated levels of service risk remaining until normal operating practices can ultimately be resumed.

We look forward to continuing to working collaboratively with Scottish Government and with SEPA over the coming months to ensure that we are able to continue to support bathing water performance in Scotland.

Yours sincerely,

Simon Parsons
Director of Strategic Customer Service Planning