

Briefing Paper

Living within environmental limits

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Introduction

In order to keep our water environment healthy, we need reliable and sustainable water services. However, in some parts of our country, the amount of water being abstracted and lost through leakage is unsustainable, and damaging to wildlife and the environment. Some areas of Scotland still suffer from pollution caused by inadequate treatment of sewage and by sewer flooding. Scottish Environment Protection Agency (SEPA) estimates that 2062km of rivers, coastal waters and estuaries are at risk from sewage pollution and other Scottish Water (SW) related activities.

The importance of a healthy water environment and wetlands

Water is essential for life. We need water to drink, wash, and grow food. It enables us to produce world-class goods and supports popular recreational activities. Water shapes our landscape, and supports an array of diverse plants and animals that depend on it. However, water environment is suffering from considerable damage caused by pollution, drainage and water abstractions. Some of this damage has been caused by water and sewerage operations.

Water environment and wetlands are rich in biodiversity and a home to thousands of species. They also support some of our best loved animals, such as otters, water voles and great crested newts. Wetlands and their associated species are not just of value in themselves: the role of wetland ecosystems in the water cycle means that they are vital in achieving good status for surface and groundwater *as a whole*. The 'multi-functionality' of wetlands is celebrated in the Ramsar Convention, the international agreement which protects wetlands. Some of the most important services provided by wetlands, which have not yet been fully recognised, are in flood mitigation and pollution control. One way to achieve more 'multi-functional' wetlands is through programmes of measures in the Water Framework Directive.

Example of environmental damage: Water leakage

The latest estimate of water leakage is over **48%** of the total amount of water supplied. **1146 millions of litres of treated water are lost in the water supplies every day.** This is equivalent to the supply of **1 million families with water every day.** This means that water customers in Scotland are paying for the treatment of twice as much water as they consume.

SEPA has estimated that 174 Scottish rivers and 42 lochs are at risk from over abstraction caused by collection, purification and distribution of water. Many of these rivers and lochs are part of our designated sites network, nationally and internationally recognised for their importance to wildlife. These important sites and species depend on water and suffer as a result of over-abstraction by Scottish Water. The current rate of water loss in Scotland is unsustainable. Decades of underinvestment have resulted in the condition of Scottish Water's assets that are in much need of improvement, replacement and repair. Water leakage rates are going up year by year, and the situation is likely to get worse if no investment is proactively made to tackle this problem.

Issues that need to be considered:

Promoting sustainable development

The current investment programme has been designed on the basis of short-term aims and objectives. Scottish Water's investment programme is largely constrained by the level of investment agreed by Scottish Ministers and price caps set by the Water Industry Commission (WIC) for a given period. The current regulatory system involving SW, Scottish Ministers and the WIC does not appear to be 'in tune' with the sustainability requirement of the Water Environment and Water Services (Scotland) Act 2003 or the Water Industry (Scotland) Act 2002. The role of the WIC appears to clash with the duties of the SW to contribute to sustainable development. Sustainable solutions may not always be the cheapest solutions for a specific problem, but may require a larger initial investment, with longer-term gains. Decisions based purely on economic advantage in the short term, without recognising the social and environmental implications of that decision, can be detrimental in the long term. Sustainable, innovative solutions should be promoted, and Scottish Water be encouraged by Scottish Ministers and the WIC to contribute actively to sustainable development.

Ending wasteful water leakage

Water leakage in Scotland is estimated in the region of 48 – 52%. This rate of water loss is unsustainable and does not only result in the wastage of a resource, but also represents a significant waste of energy, chemical and public money. This problem needs to be addressed as a matter of urgency.

Promoting efficient water use

Tap water is a precious resource, which takes energy, chemicals and money to produce. How we use water at home, work and in our garden affects the health of our water environment. Encouraging water efficiency has its place in Scotland, and could save customers money. Whilst Scotland has plentiful water supply, climate change could make water scarcer in certain parts of Scotland. Increasing water efficiency and promoting more sustainable approach to water use is a low cost and low risk option for dealing with climate change impacts.

Working with water customers, other government agencies and departments

Further emphasis is needed to ensure cross-sectoral involvement in the management of the water services in Scotland. Scottish Water, its customers, other government departments and interested parties need to be actively involved in the decision making process for the investment programmes. We believe that it is unacceptable for the customers of Scottish Water to be paying for the cleanup of pollution caused by other activities, such as agriculture. It costs customers millions of pounds each year to clean up pollution caused by other sectors in order to achieve standards for drinking water quality. Scottish Water, SEPA and departments of the Scottish Executive need to work together to address these issue through the Water Framework Directive.

Meeting the requirements of the WFD

WFD provides a unique opportunity to introduce a strategic approach to water management in Scotland, address pollution at its source, minimise impacts of activities affecting the water environment and protect and enhance the environment and biodiversity. WFD, if properly implemented, will result in greatly improved environment, and sustainable and cost-effective water management, as well as more sustainable water industry. However, this will require Scottish Water, Ministers and the WIC to make a more positive contribution to the implementation process, identifying and promoting more sustainable and longer term solutions than have been in the past and throughout Quality and Standards III consultation process.

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