

Safeguarding Scotland's Water Environment

March 2026

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Freshwater Group.

Response

1. To what extent do you agree that we have identified the most significant water management issues affecting Scotland's water environment?

Agree.

Tell us what else is important that should be included?

The report correctly identifies climate change, pollution, habitat loss and invasive non-native species (INNS) as major pressures on Scotland's water environment. These align with the findings of [Restoring Scotland's Waters report](#), which shows that multiple pressures are acting cumulatively across catchments.

However, INNS are not adequately addressed in the SWMI section. INNS should be recognised as a standalone significant water management issue, with specific management measures, targets and monitoring actions clearly outlined. Previous assumptions that 97% of water bodies are free from INNS are misleading, as many 'good' water bodies may still host



INNS and remain at risk of spread. More knowledge is needed on the extent and severity of INNS in lochs and coastal waters. Coordinated control programmes, such as those building on the Scottish Invasive Species Initiative, have demonstrated the greatest long term success when involving multiple partners, including SEPA. Please see LINK's report [Invasive non-native species in Scotland: A plan for effective action](#) for more info.

However, the issues would be more complete with clearer recognition of systemic failures in wastewater infrastructure, particularly combined sewer overflows, which remain a major and increasing source of pollution during high rainfall. The report also highlights gaps in monitoring and transparency, meaning the true scale of pollution impacts is not always well understood. In addition, contaminants (e.g. pharmaceuticals, PFAS, microplastics) are insufficiently acknowledged despite growing evidence of ecological risk. These are associated with damaging long term impacts on ecosystems and organisms, and there is urgency in addressing these.

Key additional priorities that should be explicitly included are:

- Wastewater and sewerage impacts: Strengthen commitments to reducing sewage discharges through investment in infrastructure, full monitoring of overflows, and public reporting of spill events.
- Emerging and chemical pollutants: Expand monitoring frameworks to include pharmaceuticals, PFAS and other persistent pollutants, with precautionary thresholds and early-warning systems.
- Restoration of natural processes: Greater emphasis on reconnecting rivers to floodplains, removing or modifying barriers to fish passage, and restoring natural flows to improve resilience and biodiversity.
- Groundwater protection: Improved protection of groundwater bodies from diffuse pollution and unsustainable abstraction, recognising their role in supporting river flows during drought.
- Support measures for the return of beavers as one of the tools of natural ecosystem restoration for their ability to create and maintain wetlands which increase biodiversity and act as water storage areas, and their dams that slow the flow of water through tributaries which helps to mitigate downstream flooding and poor water quality.
- Specific INNS measures: Development of targeted eradication, control and prevention strategies, prioritisation of high risk species and clear reporting frameworks aligned with the forthcoming Scottish INNS Plan and Scottish Biodiversity Strategy.



Significant Water Management Themes

Scotland’s climate is changing, and we all need to adapt to the increasing risks of flooding, drought and rising temperatures. The water environment is also under continued and evolving threats from pollution, loss of habitat and invasive species. Addressing these issues and building resilience depends on strong collaboration between the public sector, industry, land managers, community groups, and individuals.

2. To what extent do you agree that each of the following should be a theme for RBMP4 to support collaboration?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don’t know
Climate Adaptation	✓					
Nature	✓					
Health and Wellbeing	✓					

If you selected “Disagree” or “Strongly disagree”, please tell us more about the reasons for your response:

River Basin Management Planning in Your Work, Activities or Community

We recognise the importance of partnership working and ensuring our stakeholders, operators, the public and communities are actively involved and engaged in what we do. We want to open a conversation with you around RBMP 4, restoring nature and climate resilience to deepen our understanding of your experiences of river basin planning data and evidence.

3. In what ways is river basin management planning currently considered or applied in your work, activities, or community?

River basin management planning is currently considered mainly as a strategic and regulatory framework, rather than a day-to-day operational tool. As highlighted in Restoring Scotland’s Waters report, RBMP objectives are often referenced when assessing water



quality, prioritising restoration projects or responding to pollution incidents, but there is a disconnect between national RBMP ambitions and local delivery.

The report identifies that data used in river basin planning is not always easily accessible or timely for communities and stakeholders, limiting meaningful local engagement. In practice, RBMPs tend to inform high-level decision-making, while community and third-sector activity focuses on addressing visible symptoms such as flooding, sewage pollution or habitat degradation, rather than being fully integrated into RBMP processes.

RBMPs should better integrate INNS management into both strategic and operational planning, ensuring local stakeholders are empowered to monitor, report and control INNS alongside other pressures.

Engaging and involving stakeholders and communities

We want to understand how best we can engage with stakeholders and communities as we develop and deliver RBMP4.

4. Please share with us examples of participation and engagement which have worked well and could be used for river basin management planning.

Catchment-based partnerships, where public bodies, NGOs, land managers and communities collaborate to identify pressures and co-design solutions. These approaches build trust and enable more locally appropriate interventions.

Citizen science and community monitoring, particularly where volunteers collect water quality or ecological data that contributes to official evidence bases. This has proven effective in increasing awareness, transparency and local ownership.

Targeted engagement around specific issues, such as sewage discharges or bathing water quality, where communities are directly affected and motivated to participate.

The Bathing Water Review Panel provides a useful example of structured community engagement influencing regulatory processes. Wardie Bay illustrates how local campaigners, citizen scientists, local authorities and regulators can collaborate to improve bathing water monitoring and public information. The use of electronic bathing water quality signage is also a positive example of transparent, real-time public communication.

Engagement works best when participants can clearly see how their input influences decisions, and when data and outcomes are communicated in plain, accessible formats.

Engagement is also more effective and sustained if efforts are co-ordinated by local champions who enthuse communities, and NGOs and/or public bodies offer some support and liaison.



Tweed Invasives Project: Strategic catchment-scale partnership to control INNS and blueprint for other catchments.

River South Esk Catchment: Platform for stakeholders to identify nature-based solutions, including INNS control measures.

Innovation

Innovative technologies, tools, finance and approaches will be important for delivering a resilient water environment at the pace and scale required. We are interested in understanding what emerging ideas, methods or innovations could help strengthen RBMP4 and support more effective delivery.

5. Please share with us examples of where you have used innovative techniques to deliver improvements to the water environment.

Real-time monitoring and data transparency, particularly for wastewater discharges and pollution incidents, enabling quicker responses and greater accountability.

Nature-based solutions such as wetland creation, floodplain reconnection, riparian woodland restoration and potentially carefully considered species reintroductions (e.g., beavers) provide multiple benefits for biodiversity, water quality and climate resilience.

New funding and delivery models, including blended finance and long-term funding mechanisms that support catchment-scale restoration rather than short, project-based interventions.

Integrated data platforms, allowing information from SEPA, water companies, NGOs and citizen science initiatives to be shared and used more effectively in decision-making.

These approaches align with the report's conclusion that innovation must focus not only on technology, but also on governance, funding and partnership structures.

Environmental DNA for early detection of INNS provides a rapid, cost-effective and scalable monitoring tool to identify species before they establish, helping prioritise interventions.

6. Is there anything else you think is important for us to consider when developing RBMP4?



Clear, measurable targets and timelines for pollution reduction, ecological recovery and climate resilience.

Alignment with wastewater, land-use, and agricultural policy. Improved soil management, nutrient budgeting and responsible use of organic fertilisers (including treated sewage sludge) are critical to prevent contaminant transport into rivers.

Implementation of wider riparian zones (>15m) free from management responsibilities for weed control (allowing native plants to thrive which are important for our native insects) would bring multiple benefits of a biodiversity corridor linking habitats, significant reduction in beaver related conflict and a buffer zone that combats agricultural pollution by providing an area where vegetation can take in fertiliser, resulting in less run-off into waterways. In addition, increased vegetation on river banks provides stability and holds soil in place, decreasing erosion and associated sediment pollution.

Greater transparency and accountability, including open access to monitoring data, regular progress reporting, and continued expansion of electronic bathing water quality signage.

Long term management and scrutiny of monitoring data, to enable trends to be spotted and for comparison over the years.

A stronger focus on restoration, not just preventing further decline, recognising that many water bodies require active intervention to recover.

Habitat creation, where for example, the creation or encouragement of the development of a wetland can be modelled to show its potential in helping to address specific issues.

Scotland should actively keep pace with developments and changes in regulatory approaches in Europe and endeavour to maintain alignment.

Overall, RBMP4 should move from a primarily planning-led approach to one that drives delivery at catchment scale, supported by adequate resources, data transparency and long-term partnerships.

This response was compiled on behalf of LINK Freshwater Group and is supported by:

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