

Water Services: Investing in and paying from 2027

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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 response has been prepared by the Freshwater Group of Scottish Environment LINK, which brings together members working to protect and restore Scotland's water environment. Our recommendations are informed by recent evidence, including the report [Restoring Scotland's Waters](#), which highlights the need for a step change in investment to support river restoration, pollution reduction and catchment-scale resilience.

Recent data also underlines the scale of ongoing pollution challenges. Volunteers with the Marine Conservation Society recorded 23,608 items of sewage-related debris on Scottish beaches in 2025, with clear hotspots in the central belt. The highest levels were recorded in Falkirk, Inverclyde, West Lothian and Edinburgh, with wet wipes making up the largest proportion of items. This evidence demonstrates the urgent need for action to prevent sewage-related debris entering the wastewater system and to reduce discharges to the environment.

Response

Question 1 – To what extent do you agree that the Ministerial Objectives identify the type of investment activity Scottish Water should undertake in 2027-33?

Agree, but with gaps.



The objectives prioritise maintaining service standards, improving resilience and responding to climate pressures. However, they should more clearly embed ecological restoration and catchment-scale resilience as core investment themes. Investment should not be limited to asset maintenance and compliance but actively support river restoration, coastal and marine protection, pollution reduction and biodiversity recovery alongside infrastructure resilience.

Objectives should also recognise the importance of coastal and marine environments, given that wastewater discharges and diffuse pollution can directly affect estuaries and coastal waters.

Question 2 – Which areas should Scottish Water be investing in that are not covered or are there areas that are not required?

- Reducing spillages from the sewerage network and minimising the impact from all discharges to waterbodies.
- Ensuring full monitoring coverage of discharges from the sewerage system, with improved real-time transparency of spills and infrastructure upgrades.
- Reducing leakage from the drinking water mains system to reduce energy and chemical usage in the treatment process and protect waterbodies from over-abstraction.
- Catchment restoration and nature-based solutions such as wetland creation, floodplain reconnection and riparian restoration to improve water quality and climate resilience.
- Recognition of the ability of our native beavers to be a valuable tool in the above nature-based solutions and show willingness to lead in implementing conflict-reducing mitigation tools when necessary as a long term strategy to improve the health of our river systems
- Monitoring of emerging and novel pollutants, including pharmaceuticals, PFAS and microplastics, with expanded monitoring and precautionary mitigation.
- Groundwater protection, recognising its role in sustaining river flows during drought.

No major areas appear unnecessary, but there is a risk that conventional asset replacement could dominate investment at the expense of long-term ecological solutions.

Question 3 – What do you value most about the water and wastewater services provided by Scottish Water?

The provision of high-quality drinking water and universal service coverage.



Public ownership and the ability to align service delivery with wider public interest and environmental outcomes.

Historic improvements in wastewater treatment and pollution reduction.

The potential for Scottish Water to act as a delivery partner for climate adaptation and biodiversity restoration.

Question 4 – Do you have any concerns about the water and wastewater services provided by Scottish Water?

Yes.

- Continued pollution from sewer overflows and discharges, with concerns that pressures may increase as climate change drives more frequent and intense rainfall events.
- Limited transparency and timeliness of environmental performance data, alongside insufficient monitoring coverage of discharges, which restricts public understanding of system performance and environmental impact.
- Insufficient integration of ecological outcomes into investment prioritisation.
- Vulnerability of infrastructure to climate extremes due to historic underinvestment in resilience.

A stronger focus on environmental performance, catchment health and public transparency is required.

Question 5a – To what extent do you agree or disagree that the charging approach set out in the draft Principles of Charging remains appropriate for the next 6 year regulatory period 2027-2033?

Neither fully agree nor disagree.

The approach provides stability, but it does not sufficiently reflect emerging environmental and policy priorities.

Question 5b - Please explain your answer to question 5a.

The current framework focuses on cost recovery and affordability but does not sufficiently incentivise water efficiency, pollution prevention or catchment-scale investment. Charging principles should support long-term sustainability, environmental performance and



transparency. Future frameworks should better integrate climate resilience and biodiversity objectives.

Question 6a - To what extent do you agree or disagree that continuing to provide households with support for charges at the current level over the next regulatory period 2027-2033 will minimise the charge increases for all households?

Agree. Maintaining support mechanisms is important to reduce the burden of rising charges, particularly during ongoing cost-of-living pressures.

Question 6b - Please explain your answer to question 6a.

Affordability protections are essential if investment increases to address climate resilience and infrastructure upgrades. However, support mechanisms should be reviewed to ensure they adequately protect low-income and vulnerable households as costs rise.

Question 7a - To what extent do you agree or disagree that the current eligibility criteria for the charity exemption scheme remain appropriate?

Agree, subject to periodic review.

Question 7b - Please explain your answer question 7a.

The exemption supports organisations delivering public benefit and should continue. However, eligibility criteria should be reviewed periodically to ensure fairness, clarity and alignment with evolving socio-economic conditions.

Question 8a - To what extent do you agree or disagree that a fundamental review of charging policy is needed, to ensure it meets emerging policy needs and to inform the approach for the next regulatory period starting in 2033?

Agree.

Question 8b - Please explain your answer to question 8a.

The next decade will bring increased climate pressures, tighter environmental standards and rising infrastructure demands. A fundamental review should examine how charging policy can:

- Support environmental performance and catchment resilience
- Encourage efficient water use
- Ensure long-term affordability and equity
- Align with Scotland's biodiversity and climate targets



Charging policy must evolve to reflect these strategic challenges rather than simply extend the existing framework.

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

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