

Summary of correspondence with
Scottish Environmental Protection Agency
(SEPA)

Letter to MSP Pam Gosal ^{OFFICIAL}



Pam Gosal MSP
The Scottish Parliament
Edinburgh
EH99 1SP

Our Ref: OME ID:2778
Your Ref: PG1337

By email: Pam.Gosal.msp@parliament.scot

10 August 2022

Dear Ms Gosal,

Beaver translocation into LL&TNP

Thank you for your correspondence on the proposed Beaver translocation to in Loch Lomond & Trossachs National Park (LLTNP). Whilst noting the resident's questions, concerns, and benefits, SEPA is not able to comment on the specific details of the translocation. This is in part because SEPA has not so far had any involvement in the proposal but more significantly because we would not anticipate being approached as the lead authority for this issue is NatureScot.

Letter to MSP Pam Gosal

From a regulatory standpoint I can confirm that experience within SEPA to date is that any issues relating to sewage treatment and their discharges have been rare. Scottish Water has raised this with SEPA on only once and in that instance no compliance or pollution issues were identified. Where issues are highlighted or reported, SEPA would expect the user/responsible person for the authorisation/registration, septic tank for example, to highlight and discuss concerns with us directly and at the earliest opportunity. SEPA would provide advice and guidance and where appropriate share information with the competent authority. It is SEPA's understanding that where such a problem is identified NatureScot should be contacted in the first instance as there are mechanisms in place to address this. NatureScot can also give approval to remove the structure.

Letter to MSP Pam Gosal

SEPA would encourage the parties who have approached you to contact NatureScot and Loch Lomond & Trossachs National Park directly to understand the detail of the translocation. As noted, SEPA has not had any involvement currently but I can assure you that SEPA's local team, which has geographic environmental performance responsibilities, will make initial contact with LLTNP and NatureScot to be informed of the details and to develop multi-agency awareness.

Thank you for advising of the community council meeting on 5 September but as indicated above NatureScot, LLTNP are the lead organisations that should be invited along with RSPB. We would expect these organisations to liaise with SEPA, if required.

I trust this clarifies SEPA's position but should you wish to discuss the above matter further, please do not hesitate to contact Ask@sepa.org.uk.

Yours sincerely

Pamela Armstrong
Unit Manager CB Greater Glasgow & Clyde Estuary

Email to KCC Secretary

“Regarding Beaver relocation, SEPA were approached by a local MSP earlier in the month, concerns were raised regarding beaver re location and potential sewage treatment implications.

SEPA confirmed that from a regulatory standpoint experience within SEPA to date is that any issues relating to sewage treatment and their discharges have been rare. Scottish Water has raised this with SEPA only once and in that instance no compliance or pollution issues were identified.

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Email to KCC Secretary

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We were also informed of a community council meeting on 05 September. SEPA indicated in our response that as lead organisations, NatureScot and LLTNP should be invited along with RSPB and we would expect these organisations to liaise with SEPA where required. “

Summary

- If any owners of septic tank / private sewage treatment have issues (beaver related or not) then they should contact SEPA for advice at the earliest opportunity.
- Should it be necessary (and beaver related) then NatureScot will be the go to authority to advise on remedial action.
- SEPA did not address the handling of 3rd party concerns affected by private sewage treatment on neighbouring properties.
- KCC will continue to lobby for SEPA to attend a CC meeting for general discussions on private sewage treatment and water quality of Loch Lomond

Addendum

From Scotland's Beaver Strategy -

Some organisations are legally required to ensure the health and safety of infrastructure and processes. For example, discharges of wastewater under the Controlled Activity Regulations (CAR) rely on the receiving water dilution factor, at a fixed point, to comply with the conditions set out in a licence. If beavers were to disrupt, block or divert flow then this could create a non-compliance, potentially cause flooding, or create a pollution incident that would have to be resolved quickly.

Environmental legislation will need to be considered when planning for future translocations. For example, if beaver releases are proposed in or in the vicinity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), additional steps will be needed to ensure the sites are not compromised, including a Habitats Regulations Appraisal, as described in the Scottish Code for Conservation Translocations.