


SEPA Position Statement to support the implementation of the Water Environment (Controlled Activities) (Scotland) Regulations 2011:			
WAT-PS-08-01: Untreated Sewage Discharges			
Date	May 2011	Version	2.0

1 PURPOSE
<p>This position statement sets out SEPA’s policy on continuous discharges of untreated sewage and how these are to be regulated under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).</p> <p>This paper does not cover intermittent sewage discharges (combined sewer overflows).</p>
2 BACKGROUND
<p>Discharges of untreated sewage are still in existence. Untreated sewage means that the sewage has not been processed or handled in any way.</p> <p>Such untreated sewage discharges are primarily from single houses or small developments and largely discharge directly to coastal/transitional waters. Some village settlements with no mains sewerage have a mix of septic tank and untreated outfalls.</p> <p>SEPA considers that untreated sewage discharges are unacceptable, mainly due to the discharge of sewage solids, including plastic items. Further, settlements served by untreated outfalls fail the “appropriate treatment” test and are therefore in breach of the Urban Waste Water Treatment (UWWT) Directive, and associated regulations.</p> <p>SEPA is normally made aware of untreated sewage discharges during complaints or house sales. It is at this time that improvements are sought.</p> <p>Since the majority of untreated sewage discharges are small, they therefore fall to be authorised by registration. However there may be a small number of untreated discharges of sufficient size to require a licence.</p> <p>The majority of untreated discharges remain unauthorised and house sale transactions have required SEPA to issue authorisations with conditions to allow transactions to proceed. Some untreated discharges are authorised subject to conditions in a CoPA consent (now a deemed CAR registration).</p>
3 UPGRADING
<p>SEPA will authorise untreated sewage discharges by issuing a registration or a licence with a condition requiring appropriate treatment to be installed by a specified timescale (see Annex 1). Existing authorisations for untreated discharges will be varied to include a similar time limited condition.</p> <p>The timescale for upgrade is set by SEPA staff on a case-by-case basis and depends on any particular local issues. However where there are no significant local difficulties, upgrade would typically be expected to be no longer than 2 years from the date of issue of the authorisation. An upgrade timescale longer than this may be agreed where justified. SEPA will check that this upgrade in treatment has occurred.</p> <p>When made aware of an untreated sewage discharge, SEPA will follow its guidance to determine appropriate treatment. This will require sewage to be treated to at least primary standard, provision of a septic tank being perhaps the easiest means to achieve this. The proximity of designated Shellfish or Bathing Waters may however require additional treatment stages.</p>

4 SCOTTISH WATER SEWERAGE SYSTEMS

Sewerage systems adopted by Scottish Water tend to be larger and more complex. Upgrading of Scottish Water assets must be undertaken via the prioritised Quality and Standards (Q&S) process.

The presence of untreated discharges is considered to be a driver for Q&S investment and Scottish Water will continue to receive investment for improvement through the Q&S process.

SEPA requires untreated Scottish Water discharges to be upgraded to a satisfactory standard via the Q&S investment process.

However, there may remain a number of small scale untreated sewage discharges (e.g. ex-local authority properties or other adopted system) which are not a high priority and may either be low on the investment list or may not be included in the Q&S investment period.

5 FIRST TIME SEWERAGE

In certain circumstances it is impracticable and/or unreasonable to require house-owners to install individual septic tanks or treatment plants. An example of this situation would be where there is no space for individual septic tanks or other treatment systems at the top of the shore. In these cases the most appropriate solution may be a linking pipe collecting the individual discharges which would then allow treatment at a single site.

In such cases it is appropriate that these systems are put forward as candidates for first time sewerage schemes within the Q&S process, carrying an UWWT Directive driver.

6 ANNEX 1

Example condition as used in standard Registration notification covering untreated sewage discharges:

By (dd/mm/yyyy) the sewage effluent, prior to discharge, shall be treated by *septic tank*.