

Submitted to Safeguarding Scotland's Water Environment
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Significant Water Management Issues

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?

Status:

A holistic approach is needed to address significant water management issues at the scale and pace needed to create resilience in the face of the twin nature and climate crises. We need to move away from "cause-and-effect" thinking to recognising that our river systems are dynamic, interdependent and more than the sum of their parts. Working strategically at a catchment scale can align source-to-sea action across policy areas and sectors, incentivising activities and initiatives that benefit the water environment. We appreciate the support in the consultation for a new 'way of working' which encapsulates this type of catchment-based approach, noting that this type of framing needs to be supported by meaningful policy implementation and regulatory action to deliver outcomes.

The relative magnitude of pressures and impacts will vary between and within catchments – RBMP would benefit from a revised structure that allows more strategic targeting of actions and priorities from source to sea, rather than addressing isolated stretches. For example, improving the condition of mainstem rivers also requires consideration of the upstream network of small burns and tributaries. Within a catchment, small, headwater burns play a crucial role in maintaining the condition of downstream waters and often serve as the primary interface between land and the water environment. These small burns are important for fish habitat, and activities within small burns can affect local fish populations and also create cumulative effects downstream. For example, changing runoff patterns and the movement of sediments, nutrients or other pollutant inputs where they've been altered to accelerate flows off the landscape.

Additionally, some issues, such as water temperature, are affected by many water management actions, including water use, physical habitat condition, wastewater discharges and riparian management, which cumulatively contribute to temperature issues and will require coordinated action at a catchment-scale. To address these complex issues, there needs to be an improved understanding of how pressures and impacts within a broader catchment affect the ability of waterbodies to deliver and maintain the key ecosystem processes that underpin ecological status. SEPA are right in thinking that addressing the identified issues will require public bodies, land managers and other stakeholders to find new ways of working, however, SEPA's regulatory approach still has a key role to play, and this must be used more effectively.

As we set out in our response to the 2024 consultation on proposed amendments to the Environmental Authorisations (Scotland) Regulations 2018, we believe that reliance on General Binding Rules is not sufficiently protective of the water environment, and we consider that a new approach is urgently required. The tiered permitting approach within EASR has the potential to create incentives to avoid and minimize environmental harms. However, this only works in practice if the lowest tier activities (i.e., non-notifying GBRs) result in minimal adverse impacts to the environment. Revisiting the current regulatory approach would create greater alignment between regulated activities and water outcomes, improve consistency of enforcement and compliance, and create regulatory-driven incentive structures for upstream stewardship, including regenerative farming and forestry. It would also allow SEPA to better address cumulative impacts (e.g. associated with all activities authorised by EASR including water quality issues associated with chicken farming, fertilizers, livestock manure and pesticides).

Rural diffuse pollution

We support the recommendations outlined in the consultation, including better soil management, nutrient budgeting to optimise inputs and reduce overapplication, enhanced buffer strips and other in-field measures to disrupt transport pathways and improving the understanding of wastewater impacts on nutrient levels and other contaminants. Under this issue, we recommend that SEPA look beyond management actions within the agricultural sector to also address rural diffuse pollution within other sectors, such as commercial forestry. Additionally, as the effects of climate change become more pronounced, greater action will be required to address water quality impacts from rural diffuse pollution, and current standards will need to be refined.

Water quality data collected as part of the National Electrofishing Programme for Scotland, has highlighted potential pressures from nutrient pollution, particularly in the north-east, central belt and Ayrshire coast. Areas where nutrient pollution was evident were associated with depressed juvenile fish populations. The report noted that high nutrient loads and eutrophication impacts are likely to become an increasing problem under climate change when combined with low summer flows and high temperatures. Addition of fine sediment to water bodies can also smother spawning gravels, further impacting wild fish populations.

SEPA continues to identify rural diffuse pollution as a significant impact on the water environment. It is disheartening, but sadly not surprising, that SEPA state in this consultation document that "we are yet to see widespread reductions in nutrient concentrations in the water environment." We continue to have significant concerns about the use of GBRs. This is a regulatory regime which appears to be based on process, rather than environmental outcomes.

We therefore recommend that SEPA and Scottish Government review the current regulatory framework used to target diffuse pollution in light of evidence around environmental risk and harm. In addition, we recommend the following actions to tackle diffuse rural pollution:

- The width and management of buffer strips should be reviewed to ensure that they result in the desired ecological improvements to the water environment. Work undertaken by the James Hutton Institute has shown that we cannot adopt riparian buffer strips to minimise nutrient delivery from farmland to waters without proper consideration of the management of those buffer strips. Habitat 'roughness' through vegetation, is critical to ensuring

multiple benefits arising from riparian buffer strips, including habitat, erosion trapping, bank stabilisation, tree shading, woody debris and wider recreational benefits. The GBRs are silent on this vital issue.

- Livestock should not have access to the water environment and stock fencing should be a requirement for this purpose. This is even more important following the administration of pesticides, to manage the impact of those pesticides on aquatic invertebrates.
- The requirements set out in the Action Programme for Nitrate Vulnerable Zones (Scotland) Regulations 2008 should apply across Scotland. These include an annual fertiliser and manure management plan, nitrogen application limits, closed periods and application restrictions and record keeping requirements.
- Where possible, closer alignment between GBRs and relevant Good Agricultural and Environmental Conditions (GAECs) should be introduced, with a view to supporting compliance.
- Review controls for pesticides and other pollutants entering rivers. We consider that the regulation of the appropriate application of nitrogen fertiliser, sewage slurry, livestock manure, chemical fertiliser and pesticides needs to be reviewed, to ensure that the environment is adequately protected. The marine fish farming industry rightly has tight controls on organic inputs and the use of pesticides in the marine environment. We believe that similar controls should be considered to protect the freshwater environment under licence, not as a registration or GBR.
- In our last SWMI consultation response, we raised a number of concerns relating to commercial forestry and associated acidification, particularly in south-west Scotland. Continued conifer planting and drainage of deep peats causes significant acidification, as evidenced by recent water quality monitoring in Galloway rivers. We continue to have a primary concern around replanting of commercial forestry (including continuing of drainage practice) on deep peats, a practice which is not permitted for new forestry plantations, and recommend SEPA incorporate actions within RBMP4 to address these issues within the forestry sector.

Physical condition of rivers

The twin challenges for climate and nature are underpinned by cumulative disruption to the fundamental biophysical processes and systems that our natural environment is dependent on. Solutions therefore need to address those disrupted systems and source-to-sea approaches that avoid fragmenting the components of the system should be an important part of Scotland's response. As noted above, new ways of working are essential to deliver strategic catchment-based actions to manage water from source to sea as complete systems rather than isolated stretches. Improving the physical condition of the water environment also requires revisiting regulatory frameworks to ensure actions are appropriately managed and regulated in light of evidence around environmental risk and harm.

For example, we do not believe it is appropriate to allow the dredging of a river, burn or ditch under a GBR, nor do we believe that a bed width of less than 1m is an appropriate cut-off. There are many examples where Atlantic salmon, sea trout and brown trout use streams of less than 1m as spawning habitat and this GBR is no longer consistent with addressing the wild salmon crisis. Indeed, such streams can make up a large proportion of habitat (by river length) within a catchment. Dredging and straightening of such burns is common in many areas, including during the sensitive winter/spring period. Members of Fisheries Management Scotland believe that this has contributed significantly to the decline in sea trout populations, including in coastal burns. If dredging doesn't occur, even artificially straightened or canalised streams can provide suitable and productive habitat for juvenile fish. This appears to be recognised within the GBR, which states that works should not be undertaken during periods when fish are likely to spawn or in the period between spawning and subsequent emergence of juvenile fish. However, there doesn't appear to be any mechanism to ensure that this occurs, nor is there any requirement for the operator to consult with DSFBs or SEPA. We therefore believe that all dredging of rivers, and similarly impactful activities, should require additional consultation and evaluation via permitting.

In addition, the following actions should be considered to address this significant water management issue:

- Allowable activities under GBRs and the registration and licensing (permitting) process should be reviewed to ensure activities don't adversely impact important habitat or result in cumulative downstream effects, and that project reviews meaningfully consider the importance of habitat. In particular, activities which result in physical habitat impacts, including weirs, abstractions and the dredging of rivers, burns or ditches should be licensed (permitted) instead of regulated through GBRs.
- Regardless of any changes to GBRs, work currently permitted under GBRs should also include a specific requirement to liaise with the relevant District Salmon Fishery Board on any issues of relevance to migratory fish or migratory fish habitat.
- Any proposed new structures or activities in rivers, along riverbanks or within the adjacent riparian corridor should be comprehensively assessed to ensure that the impact on natural river function and a range of species beyond migratory fish are fully considered.
- Small streams and water bodies must be given the same priority as other important habitats, given their important contribution to Scotland's natural environment.

Artificial barriers to fish migration

We agree that artificial barriers to fish migration remain a significant issue in Scotland and appreciate SEPA's commitment to continue to work with fishery boards and river trusts, among others, on barrier removal and easement programmes during RBMP4. We have several additional recommendations to provide context for this important issue. Also note that some outstanding issues with barriers relate specifically to Hydro schemes (outlined separately below).

- When prioritising removal or modification of barriers, it's important to consider how existing barriers affect the continuity of river functions, including their effects on natural water, sediment, and species movement throughout the system. Whilst we recognise the value of improving fish passage, these wider issues are important in the context of the biodiversity strategy and will help to maximise benefits to fish.
- Any proposed new structures in rivers should be comprehensively assessed to ensure that the impact on natural river function and a range of species beyond migratory fish are fully considered.
- Including a target on free-flowing rivers in the monitoring framework for the River Basin Management Plan. As an example, the EU's Biodiversity Strategy for 2030 includes a target to restore at least 25,000km of free-flowing rivers.

Sea lice from marine fish farms

We agree that sea lice from marine fish farms are identified as a significant water management issue. We are deeply concerned about the practical and ecological consequences of appeals to the sea lice risk framework. As a sector we do not feel that adequate protection is in place to minimise the risk posed by farm-derived sea lice to wild fish. Once the appeals process has been resolved, the regulatory framework, and associated action to address issues needs to be taken forward at pace. We are not comfortable with the suggestion that several years of data gathering will be required before 'appropriate and targeted' action is taken.

Water use

Climate change is likely to bring more uncertainty and may exert pressure in areas that have not yet experienced water scarcity. Whilst Fisheries Management Scotland commends the engagement that SEPA has done with abstractors in the lead up to significant water scarcity within river catchments, we also consider that there are serious issues with the current approach that need to be urgently addressed. This includes earlier and more effective action to protect the water environment during water scarcity situations. The following actions are vital:

- Revise trigger levels for Significant Water Scarcity from 30 consecutive days at Q95 to a more environmentally meaningful threshold based on a cumulative number of days below this threshold flow.
- Review current water management regimes with an aim to improve water quantity and ecological outcomes, e.g., by utilising existing water impoundments (hydro dams and other reservoirs) to ensure that minimum flows are maintained throughout the summer, managing water scarcity at a river catchment scale (versus treating upper and lower catchments differently), restricting transfers of water between catchments during significant water scarcity, and ensuring that sufficient water is retained prior to water scarcity to ensure that all compensation flow requirements can be met.
- Strengthen conditions of abstraction licenses to improve water quantity and ecological outcomes. For example, by requiring hands off flow in all abstraction licences based on robust and well-understood minimum ecological flow standards (both for river flows and groundwater-dependent ecosystems), implementation of more rigorous licensing requirements with volume limits based on aquifer recharge rates and environmental flow needs, installation of monitoring equipment and regular reporting for large abstractors, and application of a catchment-based approach to managing licensing abstractions to fully account for cumulative impacts.
- Strengthen conditions of abstraction licenses to improve water quality and ecological outcomes. For example, by recognising in licences that during low flow conditions, the dilution effect for waste water discharges is significantly less, and therefore that volumes consented for discharge should also reduce.
- Recognise that prolonged low flow conditions will exacerbate water temperature issues (see below). As rocks and stones within the river become exposed they will conduct heat into the river, further warming the water.
- Incentivise water conservation actions, including leakage from public water supplies, introduction of water metering to reduce water demand, and installation of water storage lagoons and alternative watering infrastructure.
- Designate groundwater protection zones with restrictions on activities that could harm groundwater quality or quantity.

In addition to issues with water scarcity, long-term predictions for flooding in Scotland indicate a significant increase in flood risk due to climate change, with projections of higher sea levels, more intense rainfall, and increased river flows. We agree that nature-based solutions are now emerging as a key flood and drought risk management strategy. In the context of flooding, nature-based solutions aim to “slow the flow” allowing excess rainwater to be stored in the catchment and then soak into the ground. This minimises the volume of water travelling downstream before it reaches settlements. When designed and delivered well, nature-based solutions also provide wider benefits such as drought management, improved water quality and habitat creation for wildlife. These solutions can include peatland and wetland restoration, restoration of floodplain connectivity, soil improvement, woodland creation and management (particularly along water bodies to help filter runoff and prevent erosion, water storage and management features, such as small ponds, swales, basins and leaky dams, and urban and built environment solutions like rain gardens, green roofs, and permeable paving.

Wastewater and sewer networks

We agree that a more integrated approach for wastewater management is needed along with stricter standards for nutrients and additional monitoring for other emerging water quality issues. We also appreciate continued efforts to address the issues around existing wastewater and sewer infrastructure, and would recommend as part of these efforts, SEPA implement monitoring of all CSOs and make spillage data available in real time, prioritise the phase out of CSOs through modernisation of the Scottish sewerage network to separate foul and surface water, first starting with all large and frequently spilling CSOs and those affecting protected areas, and fitting all remaining CSO outfalls with screens to prevent sewage related debris from entering watercourses and coastal waters.

Chemicals in the water environment

We appreciate the commitment to innovative approaches to monitoring novel chemicals, and we encourage swift regulatory action based on best-available evidence. We believe that SEPA should develop a proactive monitoring and response framework similar to the Environment Agency's Early Warning System. This may include comprehensive monitoring programmes for pharmaceuticals, veterinary medicines, agricultural chemicals, “forever” chemicals such as PFAS and other emerging contaminants of concern. Additionally, parallel ecological/biological monitoring should be conducted alongside contaminant surveillance to establish cause-effect relationships.

Issues missing from the consultation document

In addition to the points raised above, we believe some key significant water management issues have been omitted, which would benefit from specific consideration in RBMP4.

Water temperature

Water temperature is highlighted as a key pressure, yet is not included as a significant water management issue within this consultation. Addressing water temperature issues supports greater climate resilience and improved river conditions for wild salmon and other species which require cold, clean water. Ameliorating high temperatures within waterbodies will require coordinated action across other significant water management issues which cumulatively contribute to temperature issues at a catchment-scale. For example, warmer water holds less dissolved oxygen, and higher temperatures can worsen the effects of pollution, can increase microbial activity or promote the growth of harmful pathogens and the frequency of severe algal blooms, which further deplete oxygen and can release toxins. Conversely, chemical pollutants can be more potent at higher temperatures, and warming can stress aquatic life, making them more vulnerable to existing pollutants.

Salmon, trout and many invertebrate species thrive in cool water. In 2018, it was estimated that around 70% of Scotland's rivers exceeded the thermal stress threshold for juvenile salmon (>23°C). Climate models predict that summers like 2018 could become common, occurring every other year by 2050. The Scottish River Temperature Monitoring Network provides tools and data for river managers, such as maps showing where rivers are hottest and most sensitive to climate change. Riparian tree planting is a key management strategy to reduce river temperatures, and temperature monitoring data help prioritize planting in the most beneficial locations. The Riverwoods Initiative and Blueprint Project have an important role to play, and we strongly believe that SEPA should do everything possible to facilitate planting and restoration of native riverside trees as part of its regulatory functions, including reviewing the requirements for buffer strips next to rivers. We recommend that temperature is included as a significant water management issue, and

that temperature is integrated into considerations of other significant water management issues (including land use) to ensure actions are delivered strategically to reduce water temperatures. For example, by focusing on addressing industrial cooling discharge and urban runoff which can cause thermal pollution or incentivising nature based solutions like riparian tree planting and natural regeneration via cross-sector policy alignment, public sector funding or management of regulated activities.

Hydro Schemes

While water use is identified as a significant issue, many aspects of hydro schemes are not captured under the consultation, or within SEPA's current Hydro Review. Hydro should continue to be identified as a priority in RBMP4 due to the complex and wide ranging effects on the water environment. These include fish movements, temperature and water quality, physical habitat condition, littoral zone impacts, disruptions in sediment transfer, and alterations in flow regime from water movement across river catchments. A greater focus is needed on addressing the impacts current hydro schemes and abstractions have on ecological status and wild salmon populations, beyond barriers to fish migration and flows.

Significant Water Management Themes

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

uu - Climate Adaptation:
Strongly agree

uu - Nature:
Strongly agree

uu - Health and Wellbeing:
Strongly agree

If you selected "Disagree" or "Strongly disagree", please tell us more about the reasons for your response.

Status:

We're supportive of the outcomes identified above subject to the following comments:

Measures designed to adapt to a changing climate are important but must be considered within the broader context of climate resilience to ensure adaptation processes or actions contribute to (and don't undermine) such resilience. Working towards an outcome of climate resilience will require a more integrated approach, looking beyond a set of adaptations to ensure they align with relevant policies, strategies and plans to support nature's capacity to absorb and respond to a changing climate. Functioning ecosystems play a key role in resilience, and any adaptation measures need to support dynamic and resilient ecosystems that deliver multiple benefits.

We concur with SEPA's proposal for nature outcomes to align with the Scottish Biodiversity Strategy and Scotland's Wild Salmon Strategy. Protecting and restoring natural river functions, particularly hydromorphic functions, is very important, as a well-functioning physical environment underpins good water quality and biological communities. In turn, functioning ecosystems underpin all ecosystem services, which are essential to deliver public health and wellbeing outcomes as well.

River Basin Management Planning in Your Work, Activities or Community

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

x:

SEPA will be familiar with the many ways District Salmon Fishing Boards and River Trusts are engaged in all aspects of river basin management planning. We set out below under Question 4 some examples of where the expertise of DSFBs and Trusts, if suitably resourced, could contribute in an efficient and cost-effective manner, to the delivery of RBMP4.

Engaging and involving stakeholders and communities

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

SS:

SEPA and Fisheries Management Scotland have established a National Engagement Forum which helps to facilitate constructive discussion about matters of interest and concern to fisheries and river managers. This forum was established in lieu of SEPA's decision to pull back from local engagement at local DSFB and Trust meetings. Whilst it is regrettable that such local engagement could not be continued, we do consider our national engagement forum to be a very useful development.

SEPA have a vital role to play in ensuring the successful delivery of Scotland's Wild Salmon Strategy and associated Implementation Plan. The strategy recognises that achievement of RBMP targets may not provide adequate protection for salmon at local and/or national scale. It is therefore vital that SEPA fully assess and address in RBMP4, areas where greater protection is required – this is a commitment in the Current Implementation Plan.

SEPA has again identified rural diffuse pollution as a key issue in this consultation, and recognises that "we are yet to see widespread reductions in nutrient concentrations in the water environment." Fisheries Management Scotland previously contributed to SEPA's Diffuse Pollution Management

Advisory Group (DPMAG). We are strongly of the view that such fora, with a suitably wide membership and a key focus on delivering the desired environmental outcomes, as opposed to meeting arbitrary regulatory standards, could have a very important role to play in supporting RBMP4. Similarly, the National Advisory Group and Regional Advisory Groups were well supported by fisheries and river management interests.

Our members consider that there remains considerable scope for further constructive engagement with the fisheries and river management sector. Scotland's District Salmon Fishery Boards and the River Tweed Commission are constituted and governed under the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003, and in respect of the RTC, The Scotland Act 1998 (River Tweed) Order 2006. DSFBs and the RTC have a power to appoint enforcement officers (legal term is water bailiffs) and these personnel have statutory powers similar to those held by Police Constables, including powers of detention, search, entry and seizure.

The 2003 Act is a consolidation of several pieces of legislation which pre-date the Water Environment and Water Services (Scotland) Act 2003. Both DSFBs and Trusts have a direct interest in ensuring the free passage of fish, all issues which affect water quality and quantity, as these have a direct impact on fish, fisheries and the freshwater habitat.

Whilst the WEWS Act is comprehensive in scope, there are a number of areas where there is the potential for confusion and inconsistency with the fish and fisheries legislation. In many cases, we consider that these can be addressed by ensuring good reciprocal communications between SEPA staff and the fisheries community at both a local and a national level.

We have identified instances where the CAR licensing (now EASR) and wider River Basin Management Planning processes have failed to identify inadvertent pressures on fisheries which might otherwise have been avoided had the fisheries sector been engaged. For example, when addressing barriers to fish passage, it is important to consider whether the potential solutions might lead to increased pressure through predation or fish poaching – a wildlife crime.

Given the powers of water bailiffs, and their training in maintaining a chain of evidence, we believe that there is scope to explore opportunities for closer working between water bailiffs and SEPA Environment Protection Officers.

In addition to the DSFBs, Fisheries Biologists form the network of Rivers and Fisheries Trusts undertake monitoring of invertebrates and juvenile fish in freshwater and coastal environments to agreed standards and protocols. Increasingly, this work is being undertaken on a coordinated National or regional basis, and we consider that there is potential for closer working with SEPA.

Both water bailiffs and biologists have a regular presence on Scotland's water bodies and therefore are well placed to identify and report pollution incidents and potential breaches of General Binding Rules to SEPA. Where DSFBs and Trusts report pollution incidents to SEPA, it is essential that clear follow-up information as to the subsequent actions and outcomes of any investigations is provided. This is a matter that we have recently discussed with SEPA through our national engagement forum.

Finally, FMS and our members have engaged with SEPA on the current Hydro review. We have developed thinking on the range of issues facing wild fish in relation to hydro, and have discussed these in detail with SEPA. As set out above, we consider that the issues that need to be addressed in RBMP4 are much wider than barriers to fish migration and flows, even though these are key issues. We are therefore disappointed not to see specific reference to hydropower in relation to RBMP4 in the consultation document.

Innovation

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

t:

Nearly done...

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

Please explain below:

The use of ecological status to inform monitoring and evaluation

At the time of writing, SEPA's water classification hub shows us that 65% of Scotland's surface waters are at good or better status, an improvement compared with 2008 where results showed 61% of waters achieving good or better status. While SEPA have made strong progress in increasing the proportion of water bodies at good or better status, it is important to understand whether the current approach to assessing ecological status is sufficient to prioritise the actions necessary to address the nature crisis and provide the resilience required to adapt to the climate crisis. This is recognised in Scotland's Wild Salmon Strategy and Implementation Plan, which commits to "undertake an assessment to determine possible gaps where achievement of RBMP targets may not provide adequate protection for salmon at local and/or national scale." It is vital that this assessment is initiated as soon as possible so that SEPA can build on the good work undertaken to date. It is important that large-scale and urgent action is not unnecessarily delayed to later cycles of RBMP. RBMP4 provides an opportunity to evaluate existing monitoring frameworks, identify gaps in monitoring, and establish a strategic and coordinated framework for monitoring and evaluation to inform ecological status, determine the effectiveness of regulatory actions and evaluate progress towards programmatic goals.

Strategic Monitoring and Evaluation

RBMP4 provides an opportunity to engage on key elements of the Scottish Wild Salmon Strategy. Strategic monitoring and evaluation that extends beyond the current assessment framework is needed to provide a coordinated and integrated understanding of how pressures affect the water environment, and in particular salmon populations. In addition to the specific monitoring suggestions referenced in Question 1, we also recommend the following for monitoring under RBMP4:

- While the existing available evidence highlights the need for updating the regulatory framework, there is also value in establishing future monitoring (programme audits) to evaluate the effectiveness of environmental permitting programmes. For example, to evaluate what future changes could be made to better align the regulatory framework with environmental outcomes.
- Build on existing monitoring schemes and other established monitoring frameworks (e.g., Scottish River Temperature Monitoring Network and national electrofishing programmes) to extend the reach and frequency of monitoring across Scotland.
- Establish a central data repository, based on an open data policy to ensure all monitoring data (with appropriate quality assurance) is publicly accessible in usable formats.
- Given the important contribution small streams and waterbodies provide to Scotland's natural environment, and their cumulative length relative to their mainstem counterparts, monitoring programmes should be expanded to include small streams and water bodies. This will help to better understand how pressures and impacts are distributed at the sub-catchment scale and support improved effectiveness monitoring for regulatory actions or management/restoration measures. This monitoring could build on freshwater monitoring programmes undertaken by our members to extend the reach and frequency of monitoring across Scotland.

About you

Name

What is your name?:

Fisheries Management Scotland

What is your email address?:

general@fms.scot

Are you responding on behalf of yourself, or a business or organisation?

A business or organisation

If responding on behalf of an organisation, please tell us its name.:

Fisheries Management Scotland

Are you happy for us to publish your response to this consultation?

Yes