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Dear Janet,

### **UKTAG Stakeholder review – Phosphorus and Biological standards**

Thank you for the opportunity to comment on the above consultations. We have appended our detailed comments on the draft proposals for phosphorus standards for rivers in a separate document. Below we outline our short response to the proposed recommendations on biological standards.

We welcome the proposals to update existing or create new biological standards where new or improved knowledge allows this. Scottish Water is committed to the protection and enhancement of the water environment through the most cost effective and sustainable approach. It is essential that this is underpinned by sound science to ensure that only measures resulting in a measurable environmental benefit are undertaken. This is necessary in ensuring proposed investments gain the support of customers.

A general point that we would like to make is that a great deal of proposals have been consulted upon at the same time. If the consultation period was longer we could have given a more considered response.

We welcome the proposals to carry out an ecological assessment prior to requiring measures to reduce pressures caused by barriers to fish passage and hydromorphological alterations. However, we would like to work with UKTAG and SEPA to understand how the methodology will be implemented in practice. With regard to the hydromorphology alterations, the methodology should be able to assess High, Good and Moderate Status and should also incorporate an assessment of severity rather than presence/absence.

Yours Sincerely

Tom Harvie - Clark  
**Policy Manager - Regulation**