

## Defra

### Consultation on Storm Overflows Discharge Reduction Plan

#### Background to CIWEM

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. Established in 1895 and with over 10,000 members globally, the Institution provides independent commentary on a wide range of issues related to water and environmental management, environmental resilience and sustainable development. CIWEM welcomes the opportunity to respond to Defra on its consultation on Storm Overflows Discharge Reduction Plan.

In drafting this response, we received input from our Wastewater and Biosolids specialist panel and our SuDS and our Water Re-Use policy leadership group.

#### Respondent Information Questions

##### Question: Are you responding:

On behalf of an organisation (if yes, which one): CIWEM is answering as a charity representing its members. We are an independent charity, championing professional standards, impartiality and the use of scientific evidence in the management of the environment.

##### Question: Do you know who provides your water and sewerage service?

Not applicable

#### Consultation questions

##### 1. Should the government explore developing an ecological standard for coastal and estuarine waters?

Yes, an ecological standard should be developed to help achieve the goals of the 25 year environment plan regarding marine biodiversity and coastal and estuarine natural capital. It should combine with the existing microbiological standards for Bathing and Shellfish Waters for public health protection to create a suite of standards against which to manage estuarine and coastal water quality. We recognise that this would be a novel approach internationally and the complexities and wider consequences on other regulated activities would need to be properly understood. We would support suggestions made elsewhere that given the range of different pressures on environmental water quality – both in freshwater and marine

environments – there would be significant benefit in the development of an integrated environmental water quality strategy.

**2. What considerations do you think may be relevant to developing an ecology standard for a) coastal overflows and b) estuarine overflows? Please make reference to any specific types of harm that you believe should be taken into account.**

This standard should be developed in partnership with marine ecologists and take into consideration coverage and ingestion levels of faecal indicator organisms, emerging pollutants (including pharmaceuticals and hormones, microplastics and Persistent Organic Pollutants such as PFAS and PFOS) and priority hazardous substances. It should be based on an improved understanding of levels of harm which should then inform the development of a standard.

A set of engineering principles should be devised informing how to build coastal overflows and estuarine overflows to limit the impact on human activities and the environment:

- To reduce aesthetic and possible ecological impact, all CSO's should be at least 6mm screened.
- To allow for rapid dilution and dispersion, the outfall in coastal waters should always extend below Low Water Mark Extreme Spring Tides, and in drying estuaries, it should extend to the low water channel.

**3. Should any other areas be added to the current list of high priority sites in the Plan?**

On the basis that we support the proposal to develop an ecological standard for coastal and estuarine waters we would suggest that the list of high priority sites should be expanded to include those components of marine protected areas as listed in the consultation document.

**4. Should all overflows, including those discharging into coastal and estuarine waters, be included in the scope of the Storm Overflows Discharge Reduction Plan?**

Yes – there is no reason why such discharges should be excluded.

From a practical perspective the monitoring requirements should not be the same for marine and estuarial overflows compared to freshwater environments, because in these environments sampling will be harder and more expensive. However, all overflows should be monitored to ensure the protection of the ecosystems.