

# Petitioner submission of 8 January 2023

## PE1988/B: Review the process for disposal of household raw sewage

The whole basis for the Scottish Government dealing with sewage in water ways appears to have been placed on the EU Water Framework Directive with regards to objectives for ecological and chemical status. The importance of basic human decency to not have to face exposure to human faeces in communal areas does not get mentioned; there should also be an important status for social needs in communities. The Scottish Government's submission in response to this petition states "These issues can require a considerable amount of resource to attempt to resolve what is most often a relatively insignificant environmental impact." Perhaps water quality or environmental impact is not as important a basis of assessment as would be a legal right to not tread in human faeces; a matter of social decency. The local council has a duty to keep beaches clear of dog faeces according to The Litter (Animal Droppings) Order 1991 of the Environmental Protection Act (1990) and it is an offence for it to happen (The Dog Fouling (Scotland) Act 2003) with on the spot fines of £80, increasing to £500. How can it be that dog poo has a higher legal status as an offensive, and therefore immediately fineable, item on a beach than human poo has?

SEPA is the wrong body to deal with all of the problems linked with raw sewage in public areas and it would be more effective if it is not classed always as a water quality issue. In April 2019 I reported to SEPA the fact I had to walk past human faeces sitting at the end of a discharge pipe that ends half way up the beach. Nothing has changed in almost 4 years. The pipe is still broken half way up the beach, faeces still gets deposited at the end of it from when the toilet is flushed. This type of issue could be dealt with by the local councils, as they would dog faeces, because the SEPA way has had no effect in my local area in 4 years. People across the country would not tolerate such a response time from a local council in relation to a dog faeces issue. Householders receiving regular fines for discharging sewage on the beach may have more of an incentive to effect change in their behaviour than they do at the moment.

The longer term process for SEPA to gradually phase out these permitted raw sewage outfalls (during conveyancing for any new house purchase the new householders are required to install appropriate treatment if there is currently none provided) is obviously not effective either; several of the relevant properties for the broken pipe issue have been sold in this 4 year period and no change has happened through this phased process.

I appreciate that my examples are all from one area, but as the Government's submission states, "the number of unauthorised discharges is likely to be high... SEPA believes that there remains a significant number of untreated discharges in Argyll and Bute owned by private individuals." My home village is not the only area to have this problem.

The systems of controlling this raw sewage issue need to change because within the current system people's behaviour is not changing.