

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

## **Petitioner written submission, 19 May 2025**

I would be grateful to know if there is any reason why SEPA's Corporate Leadership Team cannot be asked to carry out a review of how their staff actually monitor the details of all direct outfall pipes for homes in Scotland.

The Scottish Government has stated it is content with how SEPA is managed and with its decision making, yet a senior SEPA manager has told me that they do not have accurate up to date information on homes and owners with direct outfall pipes; if a complaint is made about a broken pipe it remains unrepaired because SEPA does not know, for many areas, which pipes exist or who even owns them. I have been told it is complicated to determine this ownership data. I have also been told, by this senior manager, that although SEPA has the powers to prosecute for unrepaired pipes they have never done this because of the concern that it will become too expensive to pursue. (see Appendix I).

The reason for starting this petition is mainly driven by the ridiculous situation of human faeces being allowed to sit on our public beaches whilst dog faeces incur a fine.

Is the Corporate Leadership Team working within Donald Rumsfeld quote territory: " ...unknown unknowns, things that we don't know that we don't know".

SEPA has not shied away from prosecutions when it comes to identifying river water courses that have been illegally altered, a current example is ongoing in Dumfries, so why is there a reticence for prosecutions for human waste on our beaches? I suspect that the Corporate Leadership Team is unaware of these decisions being made to not correctly register or pursue broken outfall pipes, and therefore does not have the data to know that potential prosecutions are being avoided.

So, is there any reason why the Scottish Government cannot be asked to write directly to the Corporate Leadership Team (CLT) for SEPA and ask them to explain why there have been no prosecutions for human waste pollution from broken direct outfall pipes on our beaches, and hence review the process of how the ownership details of all direct outfall pipes is managed?

Please note, Appendix I has more detailed explanations as to why the I feel the SEPA CLT is receiving filtered information from lower down the employee chain.

## **Appendix I**

The impetus for me initiating this Petition is because I was told in an email by a SEPA employee in 2022 that:

"...private sewage has been increasingly recognised as a issue (sic) that would benefit from clearer direction as it places a consistent demand on SEPA Officer resource in small rural offices despite the limited scope for us to influence or resolve issues.

Fundamentally, the maintenance and upgrading of a private sewage treatment systems is the responsibility of the homeowner. We still have difficulty encouraging homeowners to

take responsibility for this. This is the main issue with resolving individual problems.

I won't bombard you with information on the other factors, but they include SEPA prioritisation, the need for enforcement action to be proportionate/consistent, the not inconsiderable costs involved in upgrading/maintaining private sewage systems, lack of alternative solutions, and in most cases the extremely localised impact on the water environment from individual discharges.

Clear direction issued from the Scottish Government could certainly potentially address some of those factors, but the issue of cost is the crux of the matter."

A senior SEPA manager has told me that the sale of properties with direct outfall pipes does not automatically get listed by SEPA, there is no member of staff allocated such duties, hence the data base is out of date and progressive change does not happen; even if a home owner is contacted about changing their outfall pipe system there is no follow-up action to know if any work has been done.

We clearly have an impasse, whereby SEPA employees know the problem, and know that the current system cannot allow them to resolve it because of the prioritisation process that management can potentially use as a shield for these effectively small environmental, yet major personal human life-affecting, issues. This process of ping-pong of batting back a defensive stance from the Government that SEPA is in charge of its priorities will never effect change on this issue.

Please can the Committee take note of the information from the SEPA employees to see the reality behind the current process, and encourage the Scottish Government to guide this public body to focus on issues that are real for people and their everyday lives.

Is there any reason why the Committee cannot ask the Scottish Government to ask SEPA's Corporate Leadership Team to carry out a review of how they actually do monitor the details of all direct outfall pipes for homes in Scotland?