

Response ID ANON-1ZVS-XBAN-W

Submitted to Consumer Scotland draft workplan for energy, post and water 2022-23: Consultation
Submitted on 2022-02-28 17:08:05

Consultation Questions

1 Are these appropriate cross sector consumer issues to focus on in our work to improve outcomes for consumers in Scotland?

Yes

Please provide any further comments.:

2 Would you recommend the addition or removal of any cross sector issues of focus?

No

Please provide any further comments.:

3 Are these the appropriate energy issues to focus on in our work?

Yes

Please provide any further comments.:

4 Would you recommend the addition or removal of any energy issues?

No

Please provide any further comments.:

5 Are these appropriate post issues to focus on in our work?

Yes

Please provide any further comments.:

6 Would you recommend the addition or removal of any post issues?

No

Please provide any further comments.:

7 Are these appropriate water issues to focus on in our work?

Yes

Please provide any further comments.:

Yes, all of the water issues identified are appropriate to focus on. However, I have some comments on three of the issues.

1) Adapting to cope with flooding caused by climate change

Within the consultation document, the focus appears to be on flooding which is caused by climate change and also on blue-green infrastructure. However, before the impact of climate change is taken into account, there are an estimated 284,000 homes and premises at risk of flooding in Scotland, according to the National Flood Risk Assessment carried out by SEPA in 2018. Further, although there are many public bodies with responsibilities in relation to flood risk management, the responsibility for protecting individual properties from flooding lies with the owner of the property. Therefore, an important element of flood adaptation is raising awareness amongst the general public to allow them to understand flood risk, and supporting them to take action to protect themselves and their properties. Therefore, I recommend that Consumer Scotland's remit is broad enough to consider individual flood resilience measures.

See further Jill Robbie, "Living with water" Journal of the Law Society of Scotland (2020) 65(4)
<<https://www.lawscot.org.uk/members/journal/issues/vol-65-issue-04/living-with-water/>>

2) Adapting the use of water and wastewater in homes to tackle climate change

Within the consultation document, the focus in relation to this issue appears to be on water efficiency measures and appropriate usage of wastewater systems. However, as indicated in the document, the centralised infrastructure of water and wastewater services also contributes significantly to Scotland's carbon emissions. Therefore, I would recommend that Consumer Scotland's remit is broad enough to investigate consumer attitudes regarding innovative ways to transform water and wastewater services, such as decentralised technologies. Research is ongoing at the University of Glasgow regarding the development of such technologies with the aim of contributing to the transition to Net Zero. This research is being developed in

partnership with community representative bodies on the islands of Barra, Arran, Iona and Jura.
See further <<https://www.offgridwater.org.uk/>>

3) The adoption of the new EU recast Drinking Water Directive – to improve the quality of drinking water and access to it for all

I agree that the governance of private water supplies needs to be reconsidered in light of the implementation of the EU Drinking Water Directive. Particularly important in this context is the requirement in Art 16 of the Directive to “improve or maintain access to water intended for human consumption to all, in particular for vulnerable and marginalised groups...” In order to support progressive realisation of the human right to water and sanitation, as well as to an adequate standard of living, the inequalities between urban and rural communities in relation to water and wastewater services in Scotland need to be considered and addressed. I appreciate the work that Citizens Advice Scotland has carried out in the future and fully support ongoing focus in this area by Consumer Scotland.

8 Would you recommend the addition or removal of any water issues?

No

Please provide any further comments.:

No, we merely suggest amendments to the existing priorities as highlighted above.

About you

What is your name?

Name:

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What is your email address?

Email:

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Are you responding as an individual or an organisation?

Individual

What is your organisation?

Organisation:

University of Glasgow

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: