

# CONSULTATION

## Response Document



Safeguarding Scotland's Water  
Environment

SEPA

3rd March 2026

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 9,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Society for the Environment
- United Nations Decade of Restoration 2021-2030 Network
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has over 890 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

**This response was coordinated by Members of our [Scotland Policy Group](#).**

## **Question 1: To what extent do you agree that we have identified the most significant water management issues affecting Scotland's water environment? Tell us what else is important that should be included?**

We agree that all those identified are significant water management issues (SWMI), broadly in alignment with ScotLINK's [Restoring Scotland's Waters](#) report; however, we are disappointed that INNS are not among them in this consultation.

### **Invasive non-native species (INNS)**

INNS need to be recognised as a significant issue and listed among the detailed priority issue areas. There should be a standalone section on INNS with specific management measures, targets, and monitoring actions outlined.

In response to the draft RBMP3<sup>1</sup>, we questioned the assumption that 97% of water bodies are free from invasive non-native species (INNS). We considered this misleading because we know that, under the WFD classification, only certain INNS cause a water body to be classified as "Moderate"; however, this does not necessarily mean that those classified as "Good" are free from INNS. This also does not reflect the risk of INNS spreading to new watercourses.

When we responded to the last consultation on SWMI<sup>2</sup>, more than 20% of Scotland's transitional water bodies were at risk of failing to meet their environmental objectives as a result of INNS. We noted then that more knowledge is needed on the extent and severity of the problem in lochs and coastal waters.

We also called for SEPA to be part of any projects building on the [Scottish Invasive Species Initiative \(SISI\)](#) on the basis that co-ordinated control programmes involving a wide range of partners and stakeholders have a much greater chance of success in the long term.

Given this, and SEPA's identification of INNS as a "continued and evolving threat" to the water environment, we are at a loss as to why it is not listed here as a SWMI in advance of the next RBMP due in 2027.

We need to see the RBMP4 include specific actions for INNS beyond general prevention statements, linked to actions in the Scottish Biodiversity Strategy (SBS) delivery plan and the forthcoming Scottish draft National Invasive Non-Native Species (INNS) Plan. Since the revised National Marine Plan is expected to include policies relating to INNS, coordination with it will be essential.

Please see LINK's report [Invasive non-native species in Scotland: A plan for effective action](#) for more info.

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<sup>1</sup> <https://cieem.net/resource/the-draft-river-basin-management-plan-for-scotland-2021-2027-response/>

<sup>2</sup> <https://cieem.net/resource/significant-water-management-issues-for-scotland-response/>

## **Question 2: To what extent do you agree that each of the following should be a theme for RBMP4 to support collaboration?**

We broadly agree with the themes identified, though we have some observations.

### **A. Climate Adaptation**

We support the intention to align the RBMP4 with the Scottish National Adaptation Plan 3 (SNAP3) and to prioritise closer coordination between flood risk management and long-term water resource planning.

Nature-based Solutions (NbS) should be a key component of these efforts, including the restoration of natural flows to increase flood resilience, restoring long-term straightened watercourses to natural meandering rivers and linking them with adjacent floodplains.

Flood resilience is also heavily dependent on upstream habitat management, including riparian tree planting and peatland restoration, which helps reduce peak flows and flood risk, as well as water storage.

### **B. Nature**

We have, in the past, noted that RBMPs were not originally designed for biodiversity conservation. Monitoring therefore has typically focused on water quality, flows, and barriers to fish migration. Our understanding is that macro-invertebrates, as well as macrophytes (including diatoms, algae, etc.) are monitored by SEPA as part of the WFD classification, but clarity on how these feed into RBMPs would be welcome.

We welcome the proposed theme of “Nature”, but it must encompass these under-monitored features, many of which are good ecological proxies for river health.

We also support the intention to align the RBMP4 as a key delivery mechanism for the SBS, and for that reason, it must also take into consideration the role of the RBMP4 for helping to deliver on:

- forthcoming statutory nature targets;
- ecological networks — we encourage SEPA to link river basin management with nature networks being mapped and designated by Local Authorities in collaboration with stakeholders; and,
- the forthcoming Scottish INNS Plan.

In preparing the RBMP, consideration should also be given to the forthcoming Biodiversity Metric for Scotland and its use in delivering National Planning Framework (NPF4) Policy 3b.

## C. Health and wellbeing

The importance of marine and freshwater water bodies (a.k.a. “Blue spaces”) for health and well-being is well-recognised (e.g. [DEFRA, 2019](#); [White et al., 2020](#); [Georgio et al., 2021](#); [Geary et al., 2023](#)).

**Question 3:** In what ways is river basin management planning currently considered or applied in your work, activities, or community?)

The Chartered Institute for Ecology and Environmental Management is the professional body for ecologists and environmental managers in the UK and Ireland. CIEEM represents approximately 900 members in Scotland alone, from a range of backgrounds, including, Local Authorities, SNCBs, consultancies, and eNGOs.

**Question 4:** Please share with us examples of participation and engagement which have worked well and could be used for river basin management planning.

We are aware of a number of successful examples of participation, engagement, and cooperation:

- [River South Esk Catchment](#): a platform for all stakeholders to identify nature based solutions, among other things such as opportunities for volunteering and leisure. We understand that uptake has been good.
- [Tweed Invasives](#) Project and Tweed Forum: seen as a blueprint for others to follow; with a strategic catchment-scale, partnership approach widely recognised as an effective way of controlling INNS. The Tweed Forum more generally has shown great success in landowner participation by highlighting how nature based solutions have multiple benefits including flood protection and agricultural resilience.
- [Eddleston Water Project](#): a great example of natural flood management techniques and habitat restoration at a catchment scale.
- [Climate Ready Clyde](#): the Glasgow City Region Climate Adaptation Strategy is highlighted for covering eight councils along the catchment of the Clyde, demonstrating coordinated action across ecologically relevant areas.
- [Forth Rivers Trust](#): has brought together farmers, communities, and businesses across the Forth catchment on river restoration, natural flood management, and education. There are strong community partnerships with schools and local groups and they have successfully secured blended public and private funding. Trusted local project staff have been a key element in building all important relationships with a range of stakeholders.

- [Dee Catchment Partnership](#): brings together estates, farmers, fisheries boards, NGOs and public bodies across the River Dee with a shared catchment vision. There is a clear alignment with climate resilience and nature recovery for example with the [One Million Trees project](#).
- [Spey Catchment Initiative](#): brings together estates, landowners, farmers, the Spey Fishery Board and public bodies to work together to restore rivers and increase climate resilience through nature-based solutions. The River Calder Restoration project has recently delivered phase one to enhance aquatic biodiversity and protect against climate change impacts, through planting trees in bare riparian areas to increase shade to counter rising water temperatures.

Across these successful projects there are some key common factors, such as:

- recognition of a catchment's local identity;
- involvement of trusted local intermediaries (e.g., rivers trusts and boards with staff that build up relationships with stakeholders both locally and regionally);
- use of blended funding models;
- clear, shared outcomes;
- long-term relationship building;
- transparency in data and decision-making; and,
- identification of and framing in terms of multiple benefits (e.g. for nature, flood risk management, farming, and community wellbeing).

**Question 5: Please share with us examples of where you have used innovative techniques to deliver improvements to the water environment.**

Environmental DNA (eDNA) provides a rapid, cost-effective and scalable monitoring tool for a range of purposes, including for evaluation of the [impacts on other species of beaver reintroduction](#), and for [early detection of INNS](#).

CIEEM is currently coordinating our rebuilding nature project which will provide [best-practice guidance](#) for restoration of habitats, including those of freshwater, coastal and marine environments, in the UK and Ireland. Guidance on [bogs](#) is already available. There is also guidance on overarching topics, including on the following which may be particularly relevant to RBMPs: [Integrating Ecosystem Services into Ecological Restoration](#); [Large Scale Nature Recovery and Restoration](#); and, [Monitoring](#).

## **Question 6: Is there anything else you think is important for us to consider when developing RBMP4?**

We've noted a number of areas for consideration in preparing the RBMP4, which we'll restate here:

- Acknowledgement of INNS as a SWMI and the need for specific actions for tackling INNS in the next RBMP.
- Nature-based Solutions (NbS) as a key component in efforts to complement SNAP3.
- Linkages with forthcoming nature targets and nature networks under the theme of "Nature".
- Consistency with NPF4 and the National Marine Plan (NMP2).

We also note that without sufficient resources and commitment from partners, RBMPs are at risk of merely being unused roadmaps.

We suggest that SEPA consider establishing a Technical Advisory Group working on a potential new classification metric for INNS, addressing the present issue that it is only the presence of certain INNS that cause a water body to be at 'moderate' status. This should take into account abundance; currently, INNS that don't cause a downgrade could be present and in a 'lag' phase for several years before then they cause a problem, frustrating efforts at early detection.