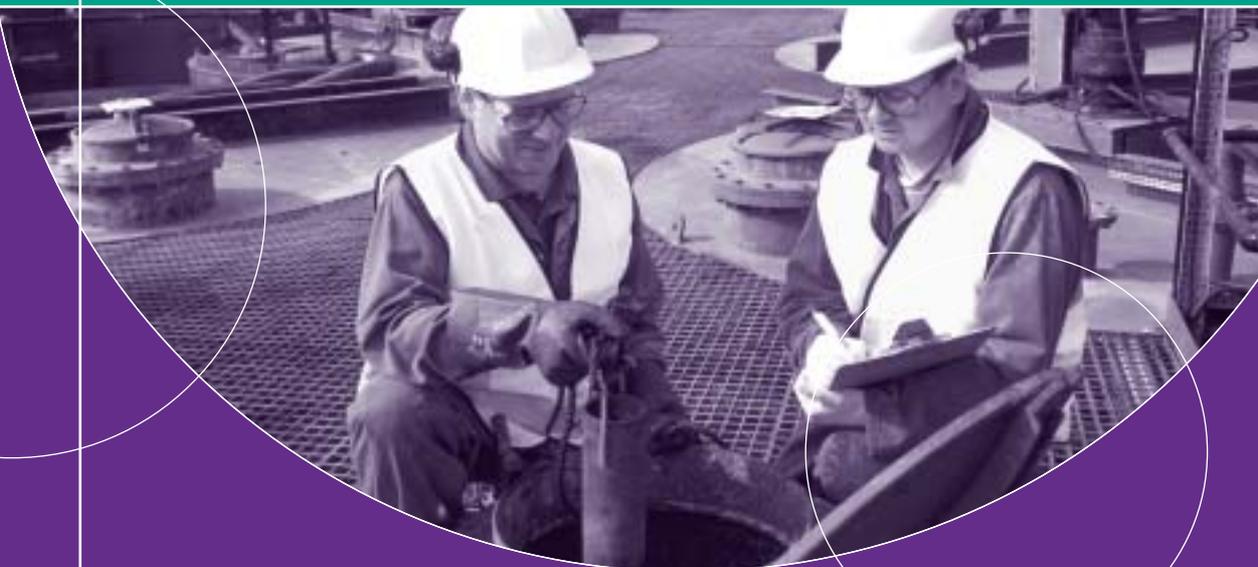


PERFORMANCE AUDIT

Measuring up?

A follow-up report on performance measurement
in the Scottish Environment Protection Agency



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A report to the Scottish Parliament by the Auditor General for Scotland

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On the front cover:

Sampling from waste tanks, SARP - Special Waste, Falkirk
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Summary and conclusions

This report records the results from a follow-up review conducted by Audit Scotland of the response made by the Scottish Environment Protection Agency (SEPA) to my report '*A measure of protection: a baseline report on performance measurement in the Scottish Environment Protection Agency*', December 2000.

The baseline report made 11 recommendations and SEPA has taken a number of actions, which will support improvement in the way its performance is managed and measured in the future. Important messages from this review include:

Environmental improvement

- New policy guidance from The Scottish Executive has assisted SEPA in developing an outcome-based performance measurement framework – a key recommendation in the baseline report.
- SEPA is continuing to develop its performance measures to provide a clearer picture of progress in improving Scotland's environment. SEPA plans to set measurable targets within the next five years, as improved performance information becomes available.
- SEPA met, or exceeded, most of its 2001 environmental outcome targets. Areas where further improvements are required are:
 - *rivers*: where the reduction so far achieved in the length of rivers classified as poor and seriously polluted is 13%, against a target reduction, by 2006, of 30%.
 - *bathing waters*: where compliance with EC standards has reduced from 88% in 1999 to 85% in both 2000 and 2001, against a target of continuous improvement.
 - *waste management landfill sites*: where SEPA has yet to obtain accurate data on the amount of biodegradable waste deposited to landfill in 1993, to measure whether the 25% reduction in the proportion of waste disposed of to non-engineered landfill sites by 2002 has been achieved.

Regulatory operations

- SEPA has addressed inconsistencies in the way its policies were being implemented. The actions taken through organisational re-structuring and improved guidance and procedures should result in consistent delivery of services.
- For the year 2001/2002, SEPA:
 - met its target for the operational readiness of its flood warning system
 - achieved at least 94% of its planned activity for the review of each type of operator licences
 - met all its operator outcome targets except for water quality – where the actual level of consent compliance for all discharges was 85%, against a target of 90%.

Measuring efficiency

- SEPA has consistently achieved its 3% year-on-year efficiency savings during the period 1997/1998 to 2001/2002.
- Its information systems strategy has resulted in improved data on water quality, workload management, and on the use of resources across its functions.

Conclusion

- SEPA has made good progress in implementing all 11 recommendations, and is looking to further improve its performance management arrangements.
- Although not yet fully in place, SEPA's performance management framework now forms an integral part of its corporate and service planning processes.
- It is important that SEPA continues to make progress in developing performance information systems for monitoring the achievement of its strategic targets and the priorities of the Scottish Ministers.
- External auditors will continue to monitor SEPA's progress in implementing a performance management framework that enables SEPA to demonstrate and be held accountable for its performance.

Background

In December 2000, I published a baseline report '*A measure of protection*', which recorded the progress that the Scottish Environment Protection Agency (SEPA) had made in developing performance measures for each of its functions and the extent to which it had achieved its targets. It also identified the actions that SEPA needed to make to improve its performance management information to enable it to:

- measure its success in meeting environmental improvement targets set by EU directives and its own environmental strategy objectives
- monitor the level and quality of its regulatory operations
- deliver improvements in its operational efficiency and fee-setting.

I asked Audit Scotland to monitor developments, and SEPA has provided a progress report on the action it has taken to address the recommendations contained in the baseline report (Appendix 1).

All of the performance information contained in this report is based on unaudited information reported by SEPA. In addition, the performance information included for 2001/2002 is indicative. The formal reporting of SEPA's 2001/2002 performance to the Scottish Parliament will be through SEPA's Annual Report, which is expected to be laid in Parliament by December 2002.

SEPA is currently the subject of a Policy and Financial Management Review (PFMR) by the Scottish Executive. Audit Scotland has attended the Scottish Executive's Steering Group in a non-executive capacity and has been liaising with the PFMR review team. The review is expected to be completed by Summer 2003.

This report provides a follow-up to my baseline report.

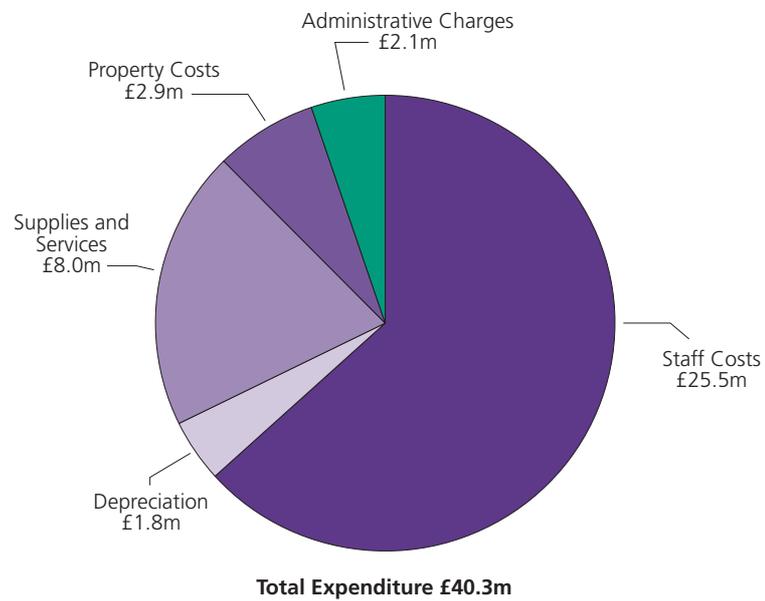
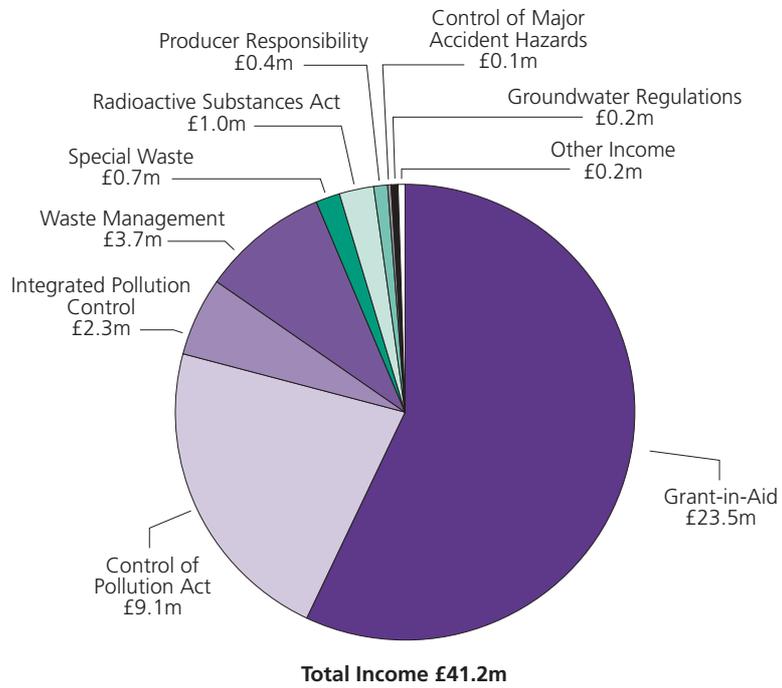
Section 1 provides an overview of the role and responsibilities of SEPA and its performance.

Section 2 looks at the policy, organisation and management changes since the baseline report and the progress made by SEPA in implementing the 11 recommendations in the baseline report.

1. SEPA – role and responsibilities

- 1.1 SEPA is a Non-Departmental Public Body (NDPB), which is responsible for environmental protection and improvement in Scotland. Its main aim is to provide an efficient and integrated environmental protection system for Scotland that will both improve the environment and contribute to the Scottish Ministers' goal of sustainable development.
- 1.2 SEPA has responsibility for:
 - monitoring the level of pollutants present in the environment
 - establishing a strategic approach to identifying environmental priorities and action to reduce the level of pollution
 - regulating potential pollution to land, air and water, the storage, transport and disposal of controlled waste, and the safe-keeping and disposal of radioactive materials
 - providing environmental advice and information, and
 - working in partnership with many public, voluntary and private sector organisations to deliver environmental improvements.
- 1.3 Each of SEPA's functions is governed by either or both European Commission and UK legislation, and each presents its own challenges for environmental improvement and protection.
- 1.4 In 2001/2002, expenditure on SEPA's activities amounted to £40.3 million (Exhibit 1). Expenditure is partly funded by grant-in-aid from the Scottish Executive Environment and Rural Affairs Department and partly met from income levied on chargeable activities. In 2001/2002, £23.5 million of SEPA's total income of £41.2 million came from grant-in-aid.

Exhibit 1: SEPA income and expenditure 2001-2002



Source: SEPA

Performance measurement

1.5 SEPA reports its annual objectives and planned activities through a Corporate Plan, approved by the Scottish Executive. The Plan sets out operational objectives including performance measures and targets for:

- environmental improvement
- regulatory operations, and
- business efficiency.

1.6 SEPA's performance in these three areas is as follows.

Environmental improvement – SEPA is responsible for providing an environmental protection system that will improve the environment and contribute to sustainable development. It cannot do this alone, but works in partnership with a range of other agencies.

SEPA maintains environmental outcome targets to monitor the quantity and quality of rivers, estuaries, coastal and bathing waters (eg, reducing the area of water classified as fair/poor, or seriously polluted). Exhibit 2 shows that SEPA met, or exceeded, most of its 2001 environmental outcome targets. Areas where further improvements are required are:

- *rivers*: where the reduction so far achieved in the length of rivers classified as poor and seriously polluted is 13%, against a target reduction, by 2006, of 30%.
- *bathing waters*: where compliance with EC standards has reduced from 88% in 1999 to 85% in both 2000 and 2001, against a target of continuous improvement.

In addition, as reported in my baseline report, SEPA has yet to obtain accurate data on the amount of biodegradable waste deposited to landfill in 1993, to measure whether the 25% reduction in the proportion of waste disposed of to non-engineered landfill sites by 2002 has been achieved.

Appendix 2 summarises the trend in environmental improvement over the period 1997-2001.

Exhibit 2: Environmental outcome measures – target and indicative actual performance 2001

ENVIRONMENTAL OUTCOME TARGETS	MET OR EXCEEDED		NOT YET MET ¹	
	Target	Actual (indicative)	Target	Actual (indicative)
Rivers				
Reduce the length of rivers classified as poor and seriously polluted by 30% between 1999 and 2006 (measured using Digitised River Network).			No specific year target	Cumulative reduction of 157km or 13%
Maintain the quality of existing good quality surface waters.	Basis of length of good quality surface waters revised, during 2000. No comparable figures ²			
Estuaries				
Reduce the area of estuarine waters classified as fair/poor and seriously polluted by 20% between 1999 and 2006.	No specific year target	Cumulative reduction of 8km ² or 25%		
Maintain the quality of existing good quality surface waters between 1999 and 2006.	777 km ²	785km ² (8km ² or 1.1% more than target)		
Coastal waters				
Reduce the length of coastal waters classified as fair/poor and seriously polluted by 15% between 1999 and 2006 (including islands).	No specific year target	Cumulative reduction of 62km or 20%		
Maintain the quality of existing good quality surface waters between 1999 and 2006 (including islands).	11,494 km	11,557 km (63 km or 0.5% more than target)		
Bathing waters				
	2000		2001	
Make continual progress towards full compliance of currently identified bathing waters.	No specific year target	51 passes, 9 fails (85% compliance)	No specific year target	51 passes, 9 fails (85% compliance)
Waste management landfill sites				
Reduce the proportion of biodegradable waste disposed of to non-engineered landfill sites by 25% by 2002 compared with 1993.	Information not available	Information not available	Information not available	Information not available

Source: SEPA

¹ Not yet met indicates that the longer-term target has not yet been achieved.

² During 2000, a new Digitised River Network was developed. This resulted in the removal of all rivers with a catchment area less than 10km², which has meant a decrease in the overall length of rivers monitored by SEPA. Subsequently, comparisons of the rivers classified as good or excellent quality in 2001 cannot be made with similar quality rivers in 1999. A method to enable this is currently being investigated by SEPA.

Regulatory operations – SEPA monitors certain rivers and other waters for risk of flooding, and regulates bodies that produce environmental pollution by issuing and reviewing licences for the storage of waste products or the discharge of specific pollutants into the environment. SEPA also maintains measures to monitor operator compliance with water, air and pollution control targets (eg, satisfactory operator performance in meeting local air pollution targets).

Exhibit 3 shows, that for the year 2001/2002, SEPA:

- met its target for operational readiness of its flood warning system
- achieved at least 94% of its planned activity for the review of each type of operator licence.

Exhibit 4 shows that SEPA met all of its operator outcome targets – except for water quality, where the actual level of consent compliance for all discharges was 85%, against a target of 90%.

Appendix 2 summarises the trend in actual performance against target for regulatory operations over the period 1997/1998 to 2001/2002.

Business efficiency – Since 1997/98, SEPA has reported that it has met its annual business efficiency target of reducing its running costs by 3%. Exhibit 5 shows the savings achieved.

Exhibit 3: Operational activity – planned and indicative actual performance 2001-2002

OPERATIONAL ACTIVITY	MET OR EXCEEDED		NOT MET	
	Planned activity	Indicative actual activity	Planned activity	Indicative actual activity
Water resource management and flood warning				
SEPA flood warning system: operational overall readiness.	Greater than 95% operational readiness No single system falling below 90%	97% operational readiness No single system falling below 90%		
Collection of quality-assured daily mean flows.	90%	98%		
Waste management targets				
Achieve planned numbers of inspections of waste management sites.			13,067 inspections	12,913 (99% of planned)
All major landfill site licences to be formally reviewed on a four-year cycle.	7 licences	9		
Licences for civic amenity sites, treatment sites and transfer stations to be formally reviewed on a five-year cycle.			98 licences	93 (95% of planned)
Integrated pollution control (IPC) targets				
Review all IPC licences on a four-year cycle.			17 licences	16 (94% of planned)
Local pollution control (LPC) targets				
Review all LAPC licences on a four-year cycle.			284 licences	274 (96% of planned)

Source: SEPA

Exhibit 4: Operator compliance measures – target and indicative actual performance 2001-2002

OPERATOR COMPLIANCE TARGETS	MET OR EXCEEDED		NOT MET	
	Target	Actual (Indicative)	Target	Actual (Indicative)
Water quality targets				
Improve the level of consent compliance for all discharges to 90% by 2001/2002.			90%	85%
Waste management targets				
Ensure that waste management sites demonstrate satisfactory performance.	80% or more	87%		
Integrated pollution control (IPC) targets				
Ensure that IPC sites demonstrate satisfactory operator performance.	80%	90%		
Local air pollution control (LAPC) targets				
Ensure that LAPC sites demonstrate satisfactory operator performance.	80%	91%		
Radioactive substance targets				
Checking of compliance with emission/discharge limits at all nuclear sites.	100% check – all within limits	100% check – all within limits		
Compliance with dose limits applicable to critical groups ³ at all nuclear sites.	100% compliance – all within limits	100% compliance – all within limits		
Assessment of the dose to critical groups at all nuclear sites.	100% achievement – all within limits	100% achievement – all within limits		

Source: SEPA

Exhibit 5: Business efficiency indicator

Business efficiency target	Efficiency savings generated – actual performance against target				
	1997/1998	1998/1999	1999/2000	2000/2001	2001/2002
Achieve efficiency savings of 3% on total running costs	Achieved 3%, saving £458,000	Achieved 3%, saving £625,000	Achieved 3%, saving £921,000	Achieved 3%, saving £970,000	Achieved 3%, saving £1,130,000

Source: SEPA

³ Critical groups include certain categories of on-site staff, such as under 18's, pregnant women.

Conclusion

In 2001/2002, SEPA reported that it had achieved:

- at least 94% of its planned activity for the review of each type of operator licences
- all of its operator outcome targets – except for water quality, where the actual level of consent compliance for all discharges was 85%, against a target of 90%
- its efficiency target by reducing its running costs by 3%.

SEPA met, or exceeded, most of its 2001 environmental outcome targets. Areas where further improvements are required are:

- *Rivers*: where the reduction so far achieved in the length of rivers classified as poor and seriously polluted is 13% against a target reduction, by 2006, of 30%.
- *Bathing waters*: where compliance with EC standards has reduced from 88% in 1999 to 85% in both 2000 and 2001, against a target of continuous improvement.

In addition, as reported in my baseline report, SEPA does not yet have accurate data for 1993, to measure whether the 25% reduction in the proportion of biodegradable waste being disposed of to non-engineered landfill sites by 2002 has been achieved.

2. Progress made by SEPA in implementing the baseline report recommendations

- 2.1 This section first looks at the overarching policy, organisation and management changes that have taken place since 2000, before looking in detail at the progress SEPA has made in implementing the 11 recommendations in the baseline report.

Policy, organisation and management

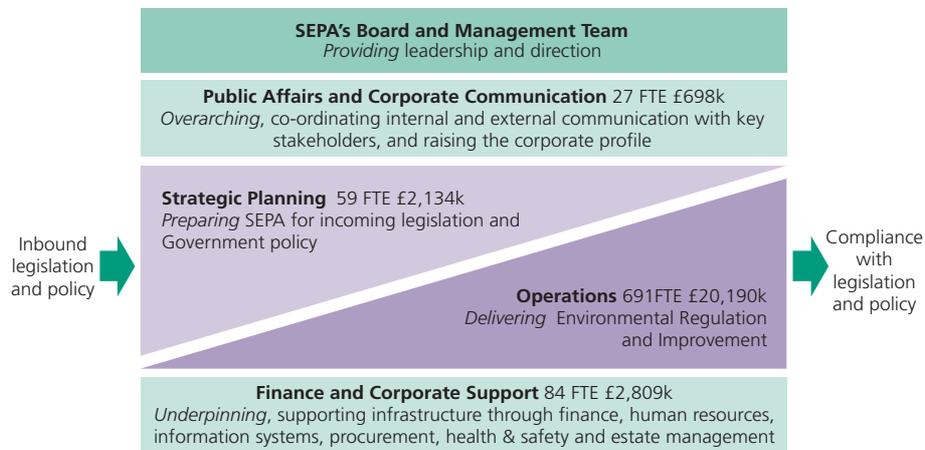
- 2.2. The main themes in the baseline report were shortcomings in the policy direction from the Scottish Executive and inconsistencies in the quality and level of service provided by SEPA across its operational areas. These points have now been addressed through:

- SEPA revising its organisational and management structures to ensure a more cohesive organisation
- The Scottish Executive publishing updated policy statements governing SEPA's management arrangements.

Organisational restructure

- 2.3 SEPA was established in 1996 from a merger of staff from some 60 bodies, including river purification boards, local authorities and HM Industrial Pollution Inspectorate. In September 2001, SEPA introduced a revised organisational structure to give it a clearer business focus with the aim of improving the efficiency and consistency of its regulation activities in Scotland (Exhibit 6).
- 2.4 The three, largely autonomous, regional directorates were amalgamated into a single operations directorate, which has responsibility for delivering environmental regulation and improvement. The new directorate provides regulatory and scientific services across the whole of Scotland, employing 80% of SEPA staff and accounting for 63% of SEPA's total budget.

Exhibit 6: SEPA's revised organisational structure



Source: SEPA

Updated policy statements

2.5 In July 2002, the Scottish Executive issued new guidance governing SEPA's management arrangements:

- a management statement (Paper 2002/19)
- policy priorities (Paper, 2002/20), and
- a financial memorandum (Paper 2002/18).

These three complementary papers provide a clearer policy framework for SEPA to work within and reaffirm its overall aim and key objectives (Exhibit 7).

Exhibit 7: SEPA's aim and key objectives

Aim *to provide an efficient and integrated environmental protection system for Scotland which will both improve the environment and contribute to the Scottish Ministers' goal of sustainable development.*

Key Objectives

- (a) *to adopt an integrated approach to environmental protection and enhancement which considers impacts on all environmental media and on natural resources;*
- (b) *to work with all sectors of society to deliver environmental requirements and goals, without imposing excessive costs (in relation to benefits gained) on regulated organisations and society as a whole;*
- (c) *to adopt clear and effective procedures for serving its customers, including developing single points of contact through which they can deal with SEPA;*
- (d) *to operate to high professional standards, based on sound science, information and analysis of the environment and of processes which affect it;*
- (e) *to organise its activities in ways which reflect good environmental and management practice and provide value for money for taxpayers and those who pay its charges;*
- (f) *to provide clear and readily available advice and information on its work, and to involve the public in environmental protection; and*
- (g) *to develop a close and responsive relationship with the public, local authorities and regulated organisations.*

Source: Scottish Environment Protection Agency, Management Statement, July 2002, Paper 2002/19

SEPA's Response to the Recommendations

2.6 The 11 recommendations fall into three main areas.

- **Environmental improvements** – to develop improved outcome measures to manage environmental improvements.
- **Regulatory operations** – to bring more consistency and quality control to its regulatory operations.
- **Overall efficiency** – to develop performance management systems to better manage operational efficiency.

Environmental improvement

2.7 The baseline report made three recommendations covering SEPA's role in improving the environment (Exhibit 8).

Exhibit 8: Baseline recommendations relating to environmental improvement

1. *The Scottish Executive and SEPA should review strategic and management objectives. These should have clear goals and measurable targets which can provide a complete picture of SEPA's performance.*
2. *Development of SEPA's performance framework should introduce greater focus on environmental improvement and on the environmental outcome of its regulatory activity.*
3. *SEPA should use management information already at hand (such as water improvement action plans) to monitor whether its planned contribution to improvements has been achieved.*

Source: A measure of protection, December 2000

2.8 SEPA's 2002/2003 Corporate Plan represents a significant change in its approach to its strategic planning and performance monitoring processes. It is based on a set of long-term environmental outcomes, including measures that will enable it to monitor both its operational performance and its contribution in achieving improved environmental outcomes.

2.9 Exhibit 9 shows the links between the Scottish Executive's priorities,⁴ the environmental outcomes that SEPA plans to achieve and the measures being adopted to monitor environmental improvement outcomes.

⁴ The Scottish Executive's priorities, as set out in the Policy priorities paper referred to in paragraph 2.5.

Exhibit 9: The link between Scottish Executive priorities and SEPA's planned environmental outcome objectives, measures and targets

Scottish Executive Priorities	SEPA's Outcome Objectives
<p>Water environment</p> <p>Aim: To protect and improve the chemical and ecological quality of Scotland's marine, coastal, surface and ground waters, and to protect public health.</p>	<ul style="list-style-type: none"> ■ Maintaining and restoring all water environments
<p>Atmospheric environment and climate change</p> <p>Aim: To reduce emissions of substances that contribute to climate change and ozone depletion.</p>	<ul style="list-style-type: none"> ■ Ensuring good air quality
<p>Air quality</p> <p>Aim: To improve Scotland's air quality and thereby reduce the risk to human health, vegetation, ecosystems and property.</p>	
<p>Waste management and land contamination</p> <p>Aim: To secure sustainable use of resources by minimising both waste and the environmental impacts of waste management. To bring land contaminated by polluting activities back into productive use.</p>	<ul style="list-style-type: none"> ■ Improving the sustainable use of natural resources by minimising waste, recovering value and ensuring best management of its disposal
<p>Accidents and flooding</p> <p>Aim: To prevent and protect the public from major accidents and flooding.</p>	<ul style="list-style-type: none"> ■ Providing an excellent environmental service for the people of Scotland – regulation and the environment
<p>Radioactive waste</p> <p>Aim: To determine general levels of radioactivity in the environment.</p> <p>To regulate the use of radioactive materials and the disposal of radioactive waste in an efficient and fair manner, in order to protect the public and the environment from the effects of ionising radiation.</p>	
<p>General</p> <p>Aim: To provide an open, accessible, efficient and accountable service to the public and Government.</p>	<ul style="list-style-type: none"> ■ Creating the environmental framework for the economic well-being of Scotland ■ Promoting respect for the environment in Scotland

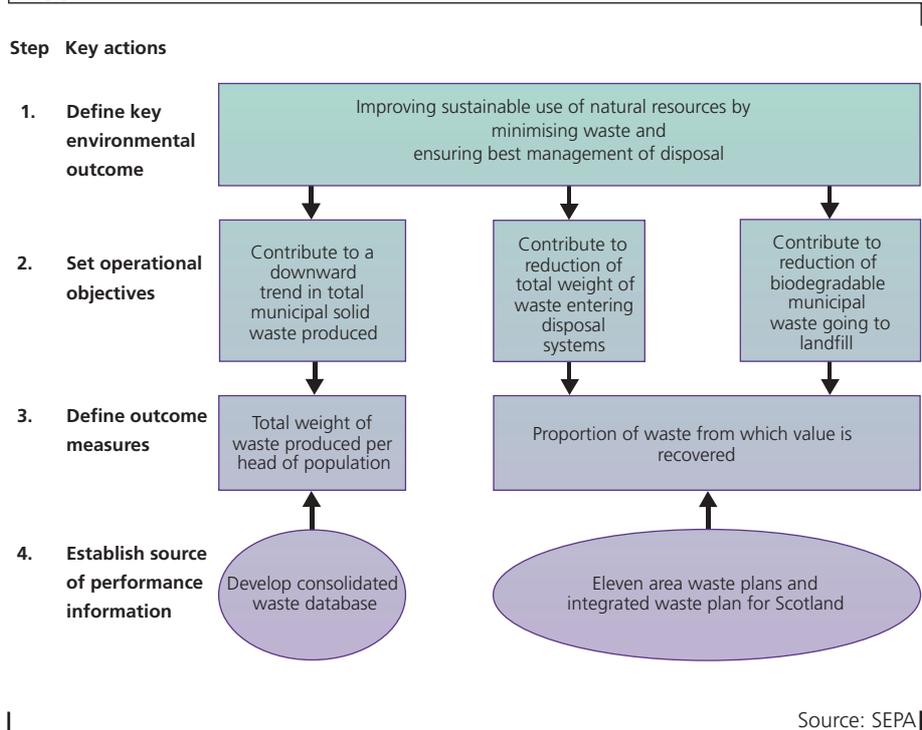
Measures	2002/2003 Target
<ul style="list-style-type: none"> ■ Quality ■ Quantity ■ Habitat 	<ul style="list-style-type: none"> ■ Improve 50km of rivers; 21km of coastal waters; ensure compliance with bathing water standards by development of action plans; and protect groundwater ■ Annual target to be determined ■ Make a substantial contribution to at least 15 habitat improvement schemes
<ul style="list-style-type: none"> ■ Pollutant emissions 	<ul style="list-style-type: none"> ■ Minimise emissions of nitrogen oxides and sulphur dioxide ■ Develop PPC database for regulated emissions of pollutants ■ Review and assess local authority air quality plans
<ul style="list-style-type: none"> ■ Total weight of waste produced per head of population ■ Proportion of waste from which value is recovered 	<ul style="list-style-type: none"> ■ Develop consolidated waste database, and contribute to a downward trend in municipal solid waste produced ■ Complete Area Waste Plans and produce integrated plan for Scotland
<ul style="list-style-type: none"> ■ Compliance ■ Readiness of Floodline and RIMNET ■ Remediation of contaminated land 	<ul style="list-style-type: none"> ■ Water (Control of Pollution Act) – 92% ■ Waste (Waste Management and Land Contamination) – 85% ■ Air (IPC, APC) – 90% ■ Control of Major Accident Hazard Regulations – 100% compliance ■ No member of the public receives radiation doses above dose limits ■ 100% readiness of RIMNET; 95% readiness of Floodline ■ Remediation of designated special sites
<ul style="list-style-type: none"> ■ Create environmental framework and provide assistance to support economic growth ■ Cost of complying with licence conditions ■ Cost of licencing and transparency of charging ■ Regulatory standards ■ Efficiency ■ Distribution of information on the environment and SEPA ■ Public attitudes to enforcement ■ Profile and public awareness of SEPA 	<ul style="list-style-type: none"> ■ Respond to all development plan consultations and input into European Structural Fund Advisory Groups ■ Develop guidance and consult ■ Determine average cost per licence to SEPA ■ Develop Regulatory Standards and survey customer satisfaction ■ Achieve 3% efficiency saving ■ Publish state of environment reports; maintain website; conduct benchmarking ■ Assess public attitudes ■ Conduct baseline survey and develop strategy

Source: SEPA Corporate Plan 2002/2003

2.10 The achievement of improved environmental outcomes is a long-term goal and the information necessary to establish measurable outcomes (and targets) will take time to develop. SEPA plans to improve its suite of outcome measures by 2007, as better performance information becomes available.

2.11 Exhibit 10 shows the approach SEPA is taking to develop performance information to support its new outcome measures for improving sustainable use of natural resources by minimising waste and ensuring best management of disposal. Where possible, SEPA is drawing on existing sources of performance information (eg, councils' area waste plans and the integrated waste plan for Scotland), and developing new information systems where required (eg, a consolidated waste database). This information should enable SEPA to set measurable targets for monitoring performance.

Exhibit 10: How SEPA is developing performance information to support its outcome measures



Conclusion

The Scottish Executive's new guidance on policy priorities for SEPA has assisted SEPA in developing an outcome-based performance measurement framework – a key recommendation in the baseline report.

However, the information systems to provide the performance data that will enable SEPA to measure environmental improvement outcomes will take time to develop. In its 2002 Corporate Plan, SEPA states that it plans to develop targets for each measure within the next five years, as improved performance information becomes available.

It is important that SEPA continues to make progress in developing performance information systems for monitoring the achievement of its strategic targets and the priorities of the Scottish Ministers.

Regulatory operations

2.12 The baseline report made four recommendations designed to address a number of significant weaknesses in the consistency with which SEPA approached its regulatory operations (Exhibit 11).

Exhibit 11: Baseline recommendations on regulatory operations

4. *SEPA should extend its quality control procedures to ensure regulatory functions are undertaken consistently and that required standards are met.*
5. *Targets used by SEPA should reflect guidance and provide a complete picture of performance against expectations.*
6. *Where the planned frequency of inspection and sampling differs from expected levels, the reasons for the differences and the associated risks should be assessed and documented.*
7. *SEPA should ensure that enforcement policies are consistently applied across all similar types of licence. Where compliance is based on operator assessments, these assessments should be undertaken consistently.*

Source: A measure of protection, December 2000

2.13 The introduction of a single operations directorate has enabled SEPA to standardise its operational procedures to deliver improved and more consistent service across the organisation. To support this, SEPA has undertaken a number of initiatives, including:

- Establishing a new national team to manage the production and issues of new procedures and guidance. An audit of all procedures and guidance was undertaken in 2001, and a two-year business plan was established to deliver consistent national procedures.
- Developing quality assurance manuals setting out the procedures that all staff should follow, supported by training for new and inexperienced staff.
- Achieving ISO 9000 quality accreditation and establishing procedures for internal and external quality audits.
- Introducing a new Regulatory Management Team of senior managers specifically tasked with considering the consistency, fairness and transparency of SEPA's regulatory policy.
- Introducing, with effect from April 2003, a new Code of Standards for Service for Regulated Persons that sets out the quality and level of service its customers should expect. Regulated persons will be surveyed to inform future customer care priorities and target-setting.

2.14 Exhibit 12 gives examples of the types of quality improvement initiatives currently in train and what they aim to achieve. SEPA will need to monitor the effectiveness of these initiatives to ensure they achieve their desired objectives.

Exhibit 12: Examples of new guidance and procedures being introduced by SEPA

Quality improvement initiative	Objective
Implementation Unit set up	To manage the production and issue of new procedures and guidance, and the transition from differing historical regional procedures into consistent practice.
Consistency of Inspections: a review of inspection procedures for water, waste and air	To examine inspection frequencies across all media and review the quality and consistency of inspections.
Risk assessment procedures and risk assessment manual	To produce a SEPA-wide manual providing guidance on risk assessment. The manual will set inspection frequencies for sites across all media to ensure a consistent approach across SEPA.
National Consenting Manual: COPA	To ensure a consistent approach with detailed procedures and templates for COPA consenting across SEPA.
Operations Helpdesk	To provide consistent advice to SEPA staff.
Integrated Quality and Health & Safety System	To review existing procedures, ensuring that new procedures (eg, for PPC and Landfill Directive) are implemented as a single set of consistent national quality-assured procedures.
Modernising Regulation	To develop SEPA's agenda for modernising and increasing the effectiveness of its regulatory activities.
Regulatory Management Team	To develop SEPA's agenda for modernising and increasing the effectiveness of its regulatory activities. To consider SEPA's regulatory policy, reviewing issues such as consistency, fairness and transparency of its regulatory activities.
Registry Unit set up for Highlands & Islands and Grampian Areas	To provide the administrative discipline to encourage consistency in application of enforcement policy.

Source: SEPA

2.15 The introduction of a risk assessment manual will provide guidance to inspection managers on the frequency of inspections for individual circumstances relating to different licence types. Managers will be expected to record decisions taken where the frequency of inspection and sampling differs from those recommended in the manual. SEPA's quality audits will test whether managers are complying with the new manual and recording the results.

Conclusion

SEPA has addressed inconsistencies in the way its policies were being implemented. The actions taken through organisational re-structuring and improved guidance and procedures should, over time, lead to a more consistent delivery of services.

SEPA should continue to maintain its quality control procedures to ensure that its operations are being undertaken in a consistent, fair and equitable basis, and that information supporting performance management is accurate and reliable.

Efficiency

2.16 The baseline report included four recommendations relating to SEPA needing to improve its performance management systems to enable it to better manage its operational efficiency, and to assist it achieve full-cost recovery by raising income from charges for certain services (Exhibit 13).

Exhibit 13: Baseline recommendations on operational efficiency

8. *The new performance measurement framework should include more meaningful measures of overall efficiency.*
9. *SEPA should ensure that its Information Systems Strategy delivers the additional information required in the timescales identified.*
10. *The additional information available should be used to provide managers at all levels within SEPA with a clearer view of operational efficiency.*
11. *SEPA should investigate whether the level of income raised from providing ad hoc advice is an accurate reflection of the resources devoted to such activities.*

Source: A measure of protection, December 2000

- 2.17 SEPA is committed to improving its processes for identifying the costs of its range of individual activities, particularly for chargeable services such as licensing activity, which will improve the transparency of how it sets its fees and charges.
- 2.18 Since the baseline report, SEPA has implemented new management information systems to improve its business planning and reporting arrangements. These include:
- *a national electronic time-recording system* which gives managers better information on how staff are deployed
 - *a geographic information system* which produces summary and detailed monthly water quality reports electronically. (Implemented February 2001)
 - *an environmental licence management system* which provides workload management information. (Five modules implemented by October 2001)
 - *a database of waste arisings*, which supports SEPA's waste management functions and underpins the development of the National Waste Strategy for Scotland. (Implemented June 2001).
- 2.19 The time-recording system, which currently covers more than 90% of SEPA's staff, can produce comparative data on the time taken to perform a range of key functions. This information is being used to develop key efficiency measures (eg, average cost of individual types of licensing inspection), which will be used to benchmark staff performance across the organisation and to highlight best practice.
- 2.20 The system will also enable SEPA to monitor the time spent by inspectors in providing ad hoc advice and review its basis of charging accordingly. For most advice services, the early indications are that the time taken by inspectors on individual cases is below the level that would cause charges to be levied. SEPA is also considering the extent to which the provision of advice might be introduced into its assessment of licence fees.
- 2.21 SEPA has also standardised its reporting arrangements across its three operational areas. Performance reports are provided to line managers, the regional boards and to the main board. From April 2002, operational performance is reported on a quarterly and annual basis in a standard format that links SEPA's strategic objectives with its operational performance.

Conclusion

SEPA has made good progress in introducing new information systems that provide a clearer picture of its use of resources and operational efficiency. It now has improved data on water quality, workload management, and on the use of resources across its functions.

Full adoption of the staff time-recording system should enable SEPA to set charges for its ad hoc advice and other services in a fair and equitable manner.

Appendices

Appendix 1: SEPA report on progress against AGS recommendations

The recommendations are listed by Audit Scotland's order of priority.

Recommendation	Audit Scotland Suggestions	Timescale
(i) The Scottish Executive and SEPA should review strategic and management objectives. These should have clear goals and measurable targets which can provide a complete picture of SEPA's performance.	SE need to produce a clear statement of what is expected of SEPA with real objectives.	As soon as possible
<p>Progress: SEPA's Management Statement has been updated to reflect devolution and capture changes in environmental policy since 1996. These changes are understood and agreed by both parties, and were signed off in summer 2002.</p> <p>Scottish Executive (environmental) policy priorities have been provided to SEPA as a first step in improving the Ministerial and Executive priority-setting for SEPA. SEPA's corporate planning and these priorities must align, and currently show good connections. The durability of the policy priorities is yet to be established, the aim is to update them every year, although the revisions may not be significant in some areas.</p> <p>SEPA's financial memorandum was also agreed in summer 2002.</p> <p>All three key documents are publicly available on the Scottish Executive's website.</p>		
(ii) Development of SEPA's performance framework should introduce greater focus on environmental improvement and on the environmental outcome of SEPA's activity.	Need to revive and conclude performance framework. Agreed to the proposal of a five-year plan.	Summer 2001. Outcome targets required by October 2001.
<p>Progress: SEPA has developed a performance framework that has introduced greater focus on environmental improvement and on the environmental outcome of SEPA's activity. The approach forms the backbone of its Corporate Plan 2002-2003, published in April 2002.</p> <p>SEPA's Directorate Operating Plans for 2002-2003 are internal planning documents and also align with the new performance framework.</p> <p>Quarterly performance reporting to the main board has been realigned to reflect the outcomes approach and provide information that focuses on environmental outcomes. Due to the long timescales associated with environmental change, some substitute information such as activities and outputs, in place of true environmental measures, is likely to be more appropriate for quarterly reporting. Activity and outputs will have transparent links to outcomes.</p> <p>Work continues to further integrate the performance framework into SEPA, with projects under way on outcome-based budgeting and linking individual performance to outcomes.</p>		

Recommendation	Audit Scotland Suggestions	Timescale
(iii) SEPA should use management information already at hand (such as water improvement action plans) to monitor whether its planned contribution to improvements has been achieved.	Include more on real successes by developing the action plans and quantify, if possible. Include proxy targets (eg, complaints as a reflection of public satisfaction). Include regulatory outcomes (eg, Operator Performance Assessment-based action).	2000-2001 Annual Report.

Progress:

National guidance for producing action plans has been issued and the amount of resource allocated to action plans has been increased. SEPA has formalised its approach to 'action planning' and extended action plan use to all media. The number of action plans has also increased from 167 in 2001-2002 to 189 in 2002-2003, representing an increased effort from 18 to 34 full-time equivalents. This meets a management target to increase total effort on action plans from 3% to 5%.

SEPA has also devoted greater effort to the active management and monitoring of action plans through three local Area Environment Groups and a National Environment Group.

SEPA intends to adopt by 1 April 2003 a Code of Standards of Service for Regulated Persons, outlining the levels of service regulated customers can expect. Adoption was previously delayed by staff changes and an extended consultation with industry bodies. SEPA has commissioned an outside consultant to assist with the production of a baseline survey of regulated persons to inform future customer care priorities and target-setting. A customer care strategy and training course for Operations Directorate staff will be prepared by 31 March 2003, based on the results of the survey.

SEPA has adopted a national, uniform customer complaints and compliments system/procedure. Information on customer complaints and compliments received is reported quarterly to the Main and Regional Boards.

Operator Performance Assessment and Waste Operator Performance Assessment systems are already used to set targets for operator compliance against licence and authorisation conditions. These targets are published via the Corporate Plan and reported against to the Main Board and management meetings.

Recommendation	Audit Scotland Suggestions	Timescale
(iv) Extend quality procedures to ensure regulatory duties applied consistently.	Inspections, licensing, reviews, etc. Possibly use an 'independent eye' and/or customer survey. Assess customer satisfaction with number of appeals or complaints. Quality control across all functions.	Prioritising between now and June 2002.

Progress:

Due to the historic regional structure of SEPA, national policy was interpreted and implemented differently in each of the three regions. Even within regions there were inconsistencies in approach. This was a recognised failing within SEPA and one which was addressed as a high priority through SEPA's restructure.

During the restructure, a new national team was established within Operations to manage both the production and issue of new procedures and guidance, and the transposition of historic regional procedures into consistent national procedures. The manager of this new Implementation Unit undertook an audit of all procedures and guidance in 2001. A two-year business plan for the Unit was produced based on this audit. The work against this business plan is summarised below.

Substantial effort has been focused on consistency of inspections. A project to examine and amend inspection frequencies across all media using the new SEPA-wide Risk Assessment Manual has been completed and implemented in time for the 2002-2003 financial year. A subgroup is being established to examine user feedback and a variety of technical amendments to the Manual, as well as benchmarking SEPA's manual against the Environment Agency's Manual. The group is due to report by autumn 2002.

In addition, work is in hand to address the philosophy, consistency and quality of licensed site inspections and to develop training packages for new and inexperienced staff. This work will be implemented in 2002-2003. The first training on waste inspections will take place during May 2002.

A National Consenting Manual for Control of Pollution Act (COPA) Consents has been produced and was launched in April 2002. The Manual will provide detailed procedures and templates for COPA consenting across SEPA and is available on the SEPA intranet.

SEPA is now moving to a single integrated and consistent Quality and Health & Safety System, replacing the four Quality systems and Health & Safety system that exist at present. The system should be in place by the autumn. This is a major SEPA-wide undertaking and work is well advanced. There are several main advantages with regards to consistency:

- New duties procedures such as those for PPC and the Landfill Directive will be implemented via a single set of consistent national quality-assured procedures.
- Over the next two years, existing procedures will be rewritten to produce nationally consistent procedures in order of priority. These will then be incorporated into the quality system. Completed work to date includes: procedures within the water manual, inspection procedures and contaminated land procedures.
- A brief audit of the consistency of conditions within licences for other legislation and the actual licence production process itself has taken place. A strategy and implementation plan is being produced for 2002-2004. This work will take considerable time and will be undertaken by task and finish groups, taking staff from their regular duties to complete. Efforts will be prioritised. Agreed templates of conditions and procedures will then be issued through the quality system.

Further measures undertaken to improve consistency include the introduction of an Operations Helpdesk from March 2002, linking technical enquiries to a network of nominated advisors throughout SEPA. It is the intention that, once quality-assured, the answers will be posted to a database, accessible to all officers and managers. The establishment of a national network has improved consistency in advice and guidance for officers.

A national peer review network to improve both the quality of licences and consistency is being developed for adoption by autumn 2002.

SEPA has introduced the post of Regulatory Risk Manager to assess, manage and report on regulatory risks arising from SEPA's activities, including inconsistency.

Recommendation	Audit Scotland Suggestions	Timescale
(v) Targets used by SEPA should reflect guidance and provide a complete picture of performance against expectations.	Guidance will be that existing and as updated. Expectations include those of Scottish Executive and public – eg, number of inspections of 'high risk' sites as perceived by public (large industry, special waste). Surveys might be required.	In time for 2002-2003 planning cycle.

Progress:

Operations Directorate has now completed a review of all inspection and review frequencies on all regimes. Where frequencies are not prescribed by statute, a risk-based assessment is used to determine the necessary frequency on a site-by-site basis. The only exception to this is that there is a minimum frequency for all licensed sites. The results of this review are available to the public.

Many of the actions noted in Recommendations (ii) and (iv) are also relevant to this action.

A customer survey was completed in June 2002 and work is underway analysing results and implications.

A consultation with the waste management industry on the Waste Operator Performance Risk Appraisal (WOPRA) system was completed in December 2001. The results will be fed into the planned review of the Manual (see (iv) above). Senior managers have also met with waste industry representatives to consider possible actions to improve waste management licensing performance, and a Scottish Waste Management Liaison Group has been established and is meeting regularly.

Recommendation	Audit Scotland Suggestions	Timescale
(vi) Where the planned frequency of inspection and sampling differs from expected levels, the reasons for the differences and the associated risks should be assessed and documented.	Specifically 'Waste Management Paper 4', which defines inspection frequencies. Possibly quick audit sheet. Publicise on public register.	Summer 2001.

Progress:

As noted for recommendations (iv) and (v), a risk-based inspection review process has been completed on a SEPA-wide basis to rationalise SEPA's approach to inspections. The results from this process were implemented in time for 2002-2003.

In addition, staff have been instructed to ensure that public files held in Registry contain a documented record of any risk-based assessments that have been carried out. SEPA's internal ISO 9000 auditors have examined a sample of register files for risk assessments during their scheduled audits that have recently included Perth, Edinburgh and Lochgilphead. Internal auditors cover offices on an annual cycle. External auditors SGS Yarsley also audit on a six monthly cycle, which included South West area (November 2001), Edinburgh (December 2001) HIG (February 2002). Each visit included auditing of risk assessment files.

Compliance with inspection frequency is monitored and reported upon.

Recommendation	Audit Scotland Suggestions	Timescale
(vii) SEPA should ensure that enforcement policies are consistently applied across all similar types of licence. Where compliance is based on operator assessments, these assessments should be undertaken consistently.	Dependent on good guidance.	prioritising between now and June 2002

Progress:

This recommendation links to recommendation (iv) concerning procedures and regulatory policy. The work being undertaken for recommendation (iv) will also address recommendation (vii).

The process of establishing a registry unit for Highlands & Islands and Grampian area (as reported in the June and December reports) is now complete.

A Regulatory Management Team of senior Operations Directorate managers has been established to consider SEPA's regulatory policy, and take an overview of regulatory issues such as consistency, fairness and transparency. Senior managers are cross-attending Licensing Team meetings to promote consistency, and the Regulatory Management Team is proving a success in producing and promulgating regulatory decisions.

A wide-ranging Modernising Regulation Task Group was established in January 2002 to develop SEPA's agenda for modernising and increasing the effectiveness of its regulatory activities. To date, the project has generated draft principles for regulation across all media, and established subgroups to examine licence reviews, the Risk Assessment Manual, and the quality and consistency of inspections. Appropriate corporate approvals for these will be sought in the near future.

Further planned work includes a review of enforcement policy, an audit against the draft principles (subject to resources) and a consultation with key stakeholders on the outputs of the project. The Group is also examining the work of the Environment Agency in these areas, and is expected to complete its work in autumn 2002, in time to inform activities for 2003-2004. In addition, a training package based on the outputs from the project will be developed during 2002-2003.

Recommendation	Audit Scotland Suggestions	Timescale
(viii) The new performance measurement framework should include more meaningful measures of overall efficiency.	Include more meaningful measures of overall efficiency – how effectively are we using resources? Assess unit costs (use activity time recording) and regulatory efficiency (activity measures).	2001-02 Annual Report.

Progress:

Progress here is dependent upon the use of Activity Time Recording system, which is now used by over 90% of SEPA staff.

Measures have also been included in the performance framework, see recommendation (ii), to address overall efficiency. These include:

- Cost of licensing and transparency of cost
- Code of Standards of Service for Regulated Persons (see recommendation (v)).

Recommendation	Audit Scotland Suggestions	Timescale
(ix) SEPA should ensure that its Information Systems Strategy delivers the additional information required in the timescales identified.	Implement was defined as 'software available, distributed and working'. Timescale set by SEPA – agreed to be ambitious.	Individual targets but all by the of end June 2001.

Progress:

There has been some change in the June 2001 timescale associated with this recommendation. The Audit Scotland Report provided a detailed breakdown of the components of this recommendation as Exhibit 8 (page 20 of the original Audit Scotland Report). Exhibit 8 is presented below, with the addition of a new column 'updated timescale'.

Project	Purpose	Planned Development/ Implementation Timescales	Updated Timescale
National Electronic Time Recording	To improve monitoring activities, to better quantify the costs of activities in relation to individual charging schemes and to assist with workload planning.	On schedule to be implemented before April 2001.	Deadline achieved.
Environmental Licence Management System	To produce a systematic register of environmental permits and associated information as well as a database for recording complaints, pollution events and enforcement action.	COPA* and environmental events modules final development and implementation before April 2001. Remaining modules phased implementation to be completed during the first quarter of 2001/2002.	Achieved. Three modules: <ul style="list-style-type: none"> ■ COPA ■ Waste, and ■ Environmental Events were implemented June 2001. Further two modules: <ul style="list-style-type: none"> ■ Air pollution licensing, and ■ Finance charging were implemented October 2001.
Support for laboratory management	Sample tracking and environmental information databases to support laboratory management of samples and to record environmental information.	Development and implementation planned for completion during the first quarter of 2001/2002.	Deadline achieved.
Air Emissions Database	To provide information on the nature and quality of regulated emissions to the atmosphere.	Project is to be rescoped due to changing business requirements and to focus on IPPC** requirements.	Achieved. Rescoping is completed, this database is now to be a part of the Environmental Licence Management System's 'air pollution licensing'.
Database of waste arisings	To provide information to support SEPA's waste management functions and to underpin the development of the National Waste Strategy: Scotland.	On schedule to be completed by April 2001.	Achieved. System completed in June 2001.
Geographic Information System	To provide a framework for presenting environmental data in a geographic and pictorial format.	Implementation scheduled for January and February 2001.	Deadline achieved.

It is clear that the June 2001 timescale was ambitious, and the changed deadlines above reflect this. In addition, the management reports from the above six projects are continually being developed (see recommendation (x)).

* COPA – Control of Pollution Act

** IPPC – Integrated Pollution Prevention and Control

Recommendation	Audit Scotland Suggestions	Timescale
(x) The additional information available should be used to provide managers at all levels within SEPA with a clearer view of operational efficiency.	Dependent on (ix).	Second half 2001.

Progress:

Business planning and reporting arrangements for the three operational areas in Highlands & Islands, Grampian, and South-East & South-West and nationally delivered services has been put in place. Reporting of operational performance to line management, regional boards and Main Board have been standardised and are reviewed monthly by relevant management groups.

The other information systems described in recommendation (ix) have progressed, as follows:

- Electronic Time Recording: this has replaced the flexitime system and the data provided is being used to inform management decision-making.
- Environmental Licence Management System: workload management information is now available for three work areas; improved performance information is now available for these areas. Implementation of the system has resulted in a significant staff overhead to input data. The system performance is currently being improved in selected areas by form redesign.
- Geographic Information System: summary and detailed monthly water quality reports can now be produced electronically. Environmental Quality Planning staff also in place to carry out improved planning, and reporting.

In order to improve the reporting functionality of SEPA's Environmental Licence Management System, a business reporting tool will be developed by the end of 2002.

Recommendation	Audit Scotland Suggestions	Timescale
(xi) SEPA should investigate whether the level of income raised from providing ad hoc advice is an accurate reflection of the resources devoted to such activities.	Dependent on activity time recording and capturing income figures.	June 2002.

Progress:

SEPA's Activity Time Recording system is now up and running. Categories for ad hoc advice allow staff to record the amount of time spent on providing information. Reports from the system give information on how much resource is devoted to such activities.

The system is currently being improved by linking directly to work activities used in business planning.

Appendix 2: Trends in SEPA performance

Exhibits 13 to 15 give details of the trend in SEPA's performance, comparing actual performance against target, over the period 1996/1997 to 2000/2001.

Exhibit 13: Environmental outcome measures – target and actual performance

	Actual Performance				
	1997	1998	1999	2000	(indicative) 2001
Rivers					
Reduce the length of rivers classified as poor and seriously polluted by 20% between 1996-2000 (manually measured lengths from paper maps). 1996 baseline 1,317km.	Reduction of 16km or 1.3%	Cumulative reduction of 47km or 3.6%	Cumulative reduction of 52km or 4%	Cumulative reduction of 361km or 27%	
Reduce the length of rivers classified as poor and seriously polluted by 30% between 1999-2006 (measured using Digitised River Network).			1999 baseline 1,169 km	Reduction of 242km or 21%	Cumulative reduction of 157km or 13%
Maintain the quality of existing good quality surface waters (manually measured lengths from paper maps). 1996 baseline 45,931km.	45,618km (313km or 0.7% less than target)	45,242km (688km or 1.5% less than target)	45,464km (467km or 1% less than target)	45,882km (49km or 0.1% less than target)	Basis of measurement changed – information not comparable
<i>Explanation for targets:</i> SEPA grades river water quality using five qualifications. The targets require a reduction in the length of rivers with the worst quality classifications (ie, to reduce poor and seriously polluted rivers) while maintaining the length of rivers with the best quality classifications. Data for 1996-2000 were collected under SEPA's manual map reading scheme. Data from 1999 onwards are based on a digitised river network.					
Estuaries					
Reduce the area of estuarine waters classified as fair/poor and seriously polluted by 20% between 1996-2000. 1996 baseline 35.7 km ² .	Cumulative reduction of 1km ² or 2.5%	Cumulative reduction of 5km ² or 15%	Cumulative reduction of 3km ² or 9%	Cumulative increase of 4km ² or 10%	
Reduce the area of estuarine waters classified as fair/poor and seriously polluted by 20% between 1999-2006.			1999 baseline 32.5km ²	Increase of 7km ² or 21%	Cumulative reduction of 8km ² or 25%
Maintain the quality of existing good quality surface waters between 1996-2000. 1996 baseline 774km ² .	774km ² (0.5 km ² or 0.6% more than target)	779km ² (5 km ² or 0.6% more than target)	777km ² (3km ² or 0.4% more than target)	770km ² (4km ² or 0.5% less than target)	
Maintain the quality of existing good quality surface waters between 1999-2006.			1999 baseline 777km ²	770km ² (7km ² or 0.9% less than target)	785km ² (8km ² or 1.1% more than target)
<i>Explanation for targets:</i> SEPA grades estuarine water quality using four classifications. The targets require a reduction in the area of estuaries with the worst quality classifications (ie, to reduce poor and seriously polluted estuaries) while maintaining the length of estuarine waters with the best quality classifications.					
Coastal waters					
Reduce the length of coastal waters classified as fair/poor and seriously polluted by 15% between 1996-2000 (excluding islands). 1996 baseline 259km.	Reduction of 17km or 6%	Cumulative reduction of 10km or 4%	Cumulative increase of 12km or 5%	Cumulative reduction of 21km or 8%	
Reduce the length of coastal waters classified as fair/poor and seriously polluted by 15% between 1999-2006 (including islands).			1999 baseline 303km	Reduction of 41km or 14%	Cumulative reduction of 62km or 20%
Maintain the quality of existing good quality surface waters between 1996-2000 (excluding islands). 1996 baseline 6,687km.	6,701km (14km or 0.2% more than target)	6,701km (14km or 0.2% more than target)	6,679km (8km or 0.1% less than target)	6,712km (25km or 0.4% more than target)	
Maintain the quality of existing good quality surface waters between 1999-2006 (including islands).			1999 baseline 11,494km	11,536km (42km or 0.4% more than target)	11,557km (63km or 0.5% more than target)
<i>Explanation for targets:</i> SEPA grades coastal water quality using four classifications. The targets require a reduction in the length of coastal waters with the worst quality classifications (ie, to reduce poor and seriously polluted coastal waters) while maintaining the length of coastal waters with the best quality classifications. In 1999, the water classification system was extended to include Scottish Islands, the monitoring of Loch Leven and recognition of Dounreay downgraded area.					

	Actual Performance				
	1997	1998	1999	2000	(indicative) 2001
Bathing waters					
Make continual progress towards full compliance of currently identified bathing waters by the end of the 1999 bathing season taking account of 37 new nominations	18 passes, 5 fails (78% compliance)	12 passes, 11 fails (52% compliance)	53 passes, 7 fails (88% compliance)	51 passes, 9 fails (85% compliance)	51 passes, 9 fails (85% compliance)
<i>Explanation for targets:</i> Physical, chemical and microbial standards for named bathing waters are laid down in EC Directive 76/160/EEC. In 1997, the Scottish executive initiated a review of beaches and inland waters for bathing. The review resulted in a further 37 new bathing waters being identified as bathing in addition to the 23 already identified. The target measures the number of bathing waters meeting the laid down standards.					
Waste management landfill sites					
Reduce the proportion of biodegradable waste disposed of to non-engineered landfill sites by 25% by 2002 compared with 1993	Information not available	Information not available	Information not available	Information not available	Information not available
<i>Explanation for targets:</i> Non-engineered landfill sites lack pollution containment systems built in to prevent pollution leaching into surrounding soil. SEPA believes this target has been met but cannot be sure because of the difficulty in obtaining accurate data on the amount of biodegradable waste deposited to landfill in 1993. It has appointed consultants to assist with this work.					

Source: SEPA

Exhibit 14: Operational activity measures – planned and actual performance

Targets	Actual Performance				
	1997-1998	1998-1999	1999-2000	2000-2001	(indicative) 2001-2002
Water resource management and flood warning					
Operational readiness of SEPA's flood warning systems to be greater than 90%, with no single system falling below 80%. (Target from 2000/2001 – 95% overall readiness, with no scheme falling below 90%.)	Overall 97% operational readiness, with one system falling below 80% operational readiness	Overall 99% operational readiness, with no system falling below 80% operational readiness	Overall 98% operational readiness, with no system falling below 80% operational readiness	Overall 97% operational readiness, with one system falling below 90% operational readiness	Overall 97% operational readiness, with no system falling below 90% operational readiness
Ensure collection of at least 90% of planned, quality-assured daily mean flows.	Information not available	97% collected	99% collected	97% collected	98% collected
<i>Explanation for targets:</i> SEPA is responsible for monitoring certain rivers and other waters at risk of flooding, and to notify the police and local authorities when flooding is likely. The targets measure the operational readiness of SEPA's systems to monitor flooding risk and the extent to which measurements of the flow rate of waters susceptible to flooding are taken into accordance with plans.					
Waste management targets					
Achieve planned numbers of inspections of waste management sites.	No target set: 12,479 inspections undertaken	Target 16,100: 14,225 inspections undertaken (88% of planned)	Target 15,800: 15,779 inspections undertaken (100% of planned)	Target 14,580: 14,487 inspections undertaken (99% of planned)	Target 13,067: 12,913 inspections undertaken (99% of planned)
All major landfill site licences to be formally reviewed on a four-year cycle.	No target set: 12 licences reviewed	Target 18: 20 licences reviewed	Target 18: 13 licences reviewed	Target 15: 23 licences reviewed	Target 7: 9 licences reviewed
Licences for civic amenity sites, treatment sites and transfer stations to be formally reviewed on a five-year cycle.	No target set: 145 licences reviewed	No target set: 85 licences reviewed	Target 100: 96 licences reviewed	Target 110: 96 licences reviewed	Target 98: 93 licences reviewed
<i>Explanation of targets:</i> The number of planned inspections and licence reviews are identified through SEPA's annual planning process. Minimum frequencies for licence reviews are laid down in the Environmental Protection Act 1990.					
Integrated pollution control (IPC) targets					
Review all IPC licences on a four-year cycle.	57 reviews planned: 21 reviews completed	88 reviews planned: 94 reviews completed	32 reviews planned: 32 reviews completed	18 reviews planned: 19 reviews completed	17 reviews planned: 16 reviews completed
<i>Explanation of targets:</i> The number of planned licence reviews is identified through SEPA's annual planning process. Minimum frequencies for licence reviews are laid down in the Environmental Protection Act 1990.					
Local air pollution control (LAPC) targets					
Review all LAPC licences on a four-year cycle.	506 reviews planned: 151 reviews completed	468 reviews planned: 502 reviews completed	290 reviews planned: 290 reviews completed	220 reviews planned: 217 reviews completed	284 reviews planned: 274 reviews completed
<i>Explanation of targets:</i> The number of planned licence reviews is identified through SEPA's annual planning process. Minimum frequencies for licence reviews are laid down in the Environmental Protection Act 1990.					

Source: SEPA

Exhibit 15: Operator compliance measures – target and actual performance

Targets	Actual Performance				
	1997-1998	1998-1999	1999-2000	2000-2001	2001-2002
Water quality targets – Control of Pollution Act					
Improve the level of consent compliance for all discharges to 90% by 2001-2002 (Target was 80% consent compliance up to and including 1999-2000.)	No. of samples 1,774	No. of samples 1,742	No. of samples 1,779	No. of samples 1,645	No. of samples 1,482
	No. complying 1,415 (80%)	No. complying 1,427 (82%)	No. complying 1,452 (82%)	No. complying 1,419 (86%)	No. complying 1,254 (85%)
<i>Explanation for target:</i> The target measures the proportion of samples of all sewage discharges, which meet conditions laid down in water consents.					
Waste management targets					
Ensure that 80% or more of waste management sites demonstrate satisfactory operator performance. (Target changed to 85% in 2001-2002.)	Operator performance scheme not in place	67% satisfactory operator performance	80% satisfactory operator performance	80% satisfactory operator performance	87% satisfactory operator performance
<i>Explanation for target:</i> SEPA has developed a scoring system to assess operator compliance using a range of criteria based on standard conditions laid out in waste management site licences. The target measures the proportion of sites that achieve or exceed a certain number of points using the scoring system.					
Integrated pollution control (IPC) targets					
Ensure that 80% of IPC sites demonstrate satisfactory operator performance.	Operator performance scheme not in operation	No. of assessments 110	No. of assessments 128	No. of assessments 161	No. of assessments 131
		No. satisfactory 99 (90%)	No. satisfactory 112 (88%)	No. satisfactory 139 (86%)	No. satisfactory 118 (90%)
<i>Explanation for target:</i> SEPA has developed a scoring system to assess operator compliance using a range of criteria based on standard conditions laid out in IPC site licences. The target measures the proportion of sites that achieve or exceed a certain number of points using the scoring system.					
Local air pollution control (LAPC) targets					
Ensure that 80% of LAPC sites demonstrate satisfactory operator performance.	Operator performance scheme not in operation	No. of assessments 931	No. of assessments 1,563	No. of assessments 1,677	No. of assessments 1,725
		No. satisfactory 691 (74%)	No. satisfactory 1,287 (82%)	No. satisfactory 1,452 (87%)	No. satisfactory 1,573 (91%)
<i>Explanation for target:</i> SEPA has developed a scoring system to assess operator compliance using a range of criteria based on standard conditions laid out in LAPC site licences. The target measures the proportion of sites that achieve or exceed a certain number of points using the scoring system.					
Radioactive substances targets					
Achieve 100% checking of compliance with emission/discharge limits at nuclear sites.	100% checking of 40 authorisations and agreements in force sites	100% checking of 43 authorisations and agreements in force sites	100% checking of 43 authorisations and agreements in force sites. All within limits	100% checking of 43 authorisations and agreements in force sites. All within limits	100% checking of 43 authorisations and agreements in force sites. All within limits
Ensure 100% compliance with dose limits applicable to the critical groups at all nuclear sites. (Critical groups include certain categories of on-site staff such as under 18's, pregnant women.)	100% within limits	100% within limits	100% within limits	100% within limits	100% within limits
Achieve 100% assessment of the dose to critical groups at all nuclear sites.			100% assessment achieved	100% assessment achieved	100% assessment achieved
<i>Explanation for targets:</i> Radioactive substances licences for nuclear establishments require operators to make returns to SEPA on the level of emissions and discharges. The first target measures the extent of SEPA's checking of monitoring returns against emissions/discharges limits laid down in licence conditions. The other targets measure the extent to which SEPA assesses exposure to radioactive substances against plans and the actual level of exposure.					

Source: SEPA



110 GEORGE STREET EDINBURGH EH2 4LH

T. 0131 477 1234 F. 0131 477 4567

www.audit-scotland.gov.uk

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