

Enforcement Undertaking – Dryfe Water

Additional Supporting Information

Information requested by SEPA, in addition to the content of Enforcement Undertaking document:

- Which projects will benefit from the donated funds?
- How GFT will show that the money had been spent on these projects?
- When will these projects be completed?
- When did GFT provide training to Story Contracting and what did this consist of?
- Story Contracting to provide SEPA with written evidence that they have made a change to their in house procedures and practices.

Response provided by Galloway Fisheries Trust:

- The funds will be spent entirely on habitat restoration within the Annan catchment. The exact location of the works has not been confirmed yet as GFT needed the funds confirmed before we would design the works. It is planned to undertake riparian fencing and riparian native deciduous tree planting which will help address both diffuse pollution and mitigate against rising water temperatures. These works will help address the Scottish Governments Biodiversity and Climate Change Emergencies.
- The funding provided will be recorded as ‘restricted funds’ which requires GFT as a charity to record and show exactly how the funding has all been spent. A copy of this record can be provided to SEPA.
- Within 18 months of the funding being provided.
- On 26/11/21 GFT gave an online presentation to STORY staff covering the risks to fish populations from instream construction works and outlining various mitigation options to protect water quality and fish populations. A focused tool box talk is also to be produced by GFT in early 2022 focused on protecting water quality and fish.

SEPA requested if Story / GFT can include some form of carbon reduction/climate change element in the offer? I.e., can you trial non diesel plant, include further tree planting (an indication of the number of trees, would be beneficial), something that captures the one planet prosperity ethos.

Additional comment from GFT:

The main driver of the proposed restoration works is the planting of riparian trees which is a climate change measure both to store carbon and to help reduce water temperatures. GFT need to get things organised soon for this but I was reluctant to until we knew it would be accepted before we spoke to landowners etc. We are also presently doing a review of Annan fisheries data to help understand the main priority areas where restoration works should be directed on the overall catchment – this is to be completed by April. We would be aiming to plant a minimum of 400 new deciduous trees.

Story agree with the comments noted above from GFT and would add the following key points:

1. In relation to [REDACTED] correspondence noted above we can confirm that we are happy to support the planting of 400 deciduous trees.
2. As detailed within the undertaking we are reviewing and updating our safety documents and procedural instructions for these types of works and were working to the date stated below of 31st January 2022.

3. We have developed a Central Procedural Instruction (PI) and would summarise the status, thus:
A work in water (riverbeds) PI is being written to address issues raised by the incident at Dryfe. It will clearly highlight roles and responsibilities pre-construction and project delivery regarding work in watercourses. It will offer guidance regarding riverbed materials, silt mitigations/controls, inspection regimes and the necessity to consult with competent persons at various stages of projects working in water. This procedure will apply to all work in water throughout the company going forward and reference associated documentation. This procedure is currently under internal review prior to obtaining some external review and guidance from specialist environmental professionals which point it will be integrated into systems and rolled out across the business.
4. In addition to the PI noted above we are reviewing and updating associated documentation / forms in support of the above PI, e.g., Environmental inspection record, Water quality inspection records etc. These documents will be reviewed to ensure compliance with the published PI and will be subject to assurance via audits and inspections with the company audit proforma's updated where necessary.
These documents / forms are currently under internal review prior to obtaining some external review and guidance from specialist environmental professionals at which point it will be integrated into systems and rolled out across the business.
5. In relation to training various training courses are being assessed & booked for various roles, preconstruction, delivery and assurance in line with the rail ESMP update (carbon & sustainability) and in response to the Dryfe incident (SEATS etc.).
6. Regarding carbon reduction & sustainability, we as a company have invested a great deal of resources in to establishing a baseline carbon footprint and developing a carbon reduction strategy / program over the last year or so. We have recently submitted a great deal of documentation as part of our signing up to the Science Based Target initiative (SBTi). This documentation is currently under review, however, in the meantime, we are trialling various technologies on our sites such as the Croy AFA project.
At Croy for example, we have EV charging points, solar/hybrid generators which are using HVO fuels as the backup fuel in lieu of diesel. This project is subject to a case study as to roll these new technologies out across all Story sites. The number of initiatives companywide regarding carbon reduction are numerous, and are largely detailed within our carbon strategy.