



Drinking Water Inspectorate Statement for Bristol Water's Local Engagement Forum Report to Ofwat

1. Introduction

- 1.1 The Drinking Water Inspectorate (DWI) is the independent regulator of drinking water quality in England and Wales. We protect public health and maintain confidence in public water supplies by ensuring water companies supply safe clean drinking water that is wholesome, and that they meet all related statutory requirements. Where standards or other requirements are not met, we have statutory powers to require water supply arrangements to be improved.
- 1.2 We publish information about drinking water quality and provide technical advice to the Secretary of State for the Environment, Food & Rural Affairs, and to Welsh Ministers.
- 1.3 For PR14, water companies are expected to ensure that their business plans make provision to meet all their statutory obligations, including the need for public water supplies to be safe, clean and wholesome, and that provision is made for a sustainable level of asset maintenance to maintain public confidence in drinking water quality. Ministers summarised these requirements in Defra's Statement of Obligations¹, and in their further guidance on PR14 matters to Ofwat. In addition, the Inspectorate set out in **DWI Information Letter 01/2013 – The 2014 Periodic review of Prices – Guidance for water companies**, published on 1st February 2013 supplementary guidance to companies on the regulatory framework for drinking water quality, statutory requirements, the Inspectorate's role in the Price Review process and our requirements for companies seeking technical support. The Inspectorate also published separate PR14 guidance on a range of specific issues. All of the Inspectorate's published PR14 guidance is available on the DWI website.
- 1.4 It is worth noting the particular emphasis that Ministers placed in their Guidance on the resilience of supply systems, and that the Inspectorate placed on existing duties to manage the introduction of new sources and to plan supply arrangements to protect consumers and ensure no deterioration in the quality of their supplies.

¹ <http://www.defra.gov.uk/publications/files/pb13829-statement-obligations.pdf>

1.5 The Inspectorate has a position on all of the water companies' customer challenge groups in England and Wales. The Inspectorate's representative on Bristol Water's Local Engagement Forum (LEF) has supported the process by acting as an independent member with the overall remit of ensuring that the Company business plan proposals reflect the views of consumers and place drinking water quality at the forefront of such plans.

2. Formal Drinking Water Proposals Requiring DWI Technical Support

2.1 As with previous periodic reviews, water companies seeking technical support from the Inspectorate must demonstrate the need for each proposal. The case for justification must be accompanied by evidence of the company's options appraisal process to identify the most robust, sustainable and cost-effective solution, with evidence that the preferred solution will adequately address the risk and deliver the required outcome within an appropriate timescale.

2.2 Bristol Water submitted 6 formal proposals for drinking water quality to the Inspectorate, listed in the table below:

PR14 DWI Ref.	Scheme Name	Quality Parameter(s)	Scheme Type	Preferred Option	DWI Final Decision
BRL02	Cheddar WTW	Various - Raw water deterioration	Treatment	Replacement of SSFs with Ozone, DAF and RGFs	Commend for Support
BRL03	Purton & Littleton Catchment Management	Metaldehyde	Catchment Management	Catchment actions	S19 Undertaking
BRL37	Cheddar WTW Final pH	pH	Treatment	pH correction with sodium hydroxide	Commend for Support
BRL38	Lead Strategy	Lead	Company lead strategy	Package of measures	Regulation 28 Notice
BRL39	Stowey Final pH	pH	Treatment	pH correction with sodium hydroxide	Commend for Support
BRL40	Barrow WTW	<i>Cryptosporidium</i>	Treatment	UV irradiation	Regulation 28 Notice

2.3 The Company is to be commended on the quality of the submissions to the Inspectorate, which complied with our PR14 guidance. The Inspectorate met with the Company before the proposals were submitted, and in addition discussions had taken place at meetings of the LEF and Investment Programme Subcommittee. Therefore, we were broadly aware of the Company's plans for drinking water quality and we are generally supportive of the Company's approach.

- 2.4 The Inspectorate has supported all of the proposals as indicated above and discussed below, and we will put legal instruments in place for three of them to make these proposals legally binding programmes of work. Our final decision letters were sent to the Company on 9th October 2013.
- 2.5 The two proposals for Cheddar WTW involve major refurbishment of and improvements to the treatment works to deal with an increasing level of raw water challenge, in particular algal blooms. The final water pH correction proposal, whilst submitted as a separate proposal, is linked to the same issue. We have commended these two schemes for support because we agree that it is in customer's best interests in the longer term for this work to be done. There are no grounds for DWI enforcement for the schemes because there is no clear drinking water quality driver and there is no clear link between the performance of the existing treatment processes and any non-compliance with the drinking water standards in the final water. There is evidence of need, however, because of raw water quality challenges, and the Company provided evidence of deterioration of raw water quality in its proposal.
- 2.6 The proposal to install pH correction at Stowey WTW is also linked to deterioration of raw water quality (increasing algal challenge which affects pH), and we have commended this proposal for support. As with the Cheddar pH proposal, there are no grounds for DWI enforcement but we agree that the scheme will benefit customers and that it should be included in the Company's business plan. The Company provided evidence of deterioration of raw water quality in its proposal.
- 2.7 The Company submitted a proposal to address lead in drinking water, which will be covered by a Notice. The standard for lead will reduce from 25µg/l to 10µg/l in December 2013, and the package of measures included in the Company's proposal will improve compliance with the new standard and reduce consumers' exposure to lead from drinking water.
- 2.8 The catchment management proposal to address metaldehyde is also included in the NEP. Metaldehyde is widely used in agriculture for the control of slugs, and is not removed by existing treatment processes for pesticide removal. 2012 was a very wet year and Bristol Water, like many other companies, experienced high levels of metaldehyde in raw waters which lead to failures of the standard in water supplied to customers. We recognise that companies need to focus on catchment activities to reduce the risks to drinking water quality and therefore we will put a legal instrument in place to cover this proposal.
- 2.9 The proposal to install UV treatment for *Cryptosporidium* at Barrow WTW is to address a risk to public health because of detections of oocysts in one of the raw water feeds to the treatment works. This proposal will be covered by a Notice.
- 2.10 It should be noted that these improvement schemes will make only a small contribution to enabling the Company to meet its legal obligations in respect of drinking water quality. These obligations are met overwhelmingly by the Company making sufficient provision for operational and maintenance

requirements in its business plan, and by its use of those resources. These are matters for the Company to determine and deliver. For its part, the Inspectorate will continue to keep under review, and report on, the performance of the Company in meeting its legal obligations. Statutory powers are available to secure or facilitate compliance, if necessary.

2.11 The summary of improvement schemes above reflects the position at the time of writing this statement. Further discussions are needed with the Company to finalise details. We will advise the LEF and Ofwat of any material changes.

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