DRINKING WATER INSPECTORATE



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To: Lesley Griffiths MS Minister for Environment, Energy and Rural Affairs

The Drinking Water Inspectorate for Wales will be publishing its annual drinking water report on 9 July, which summarises the overall drinking water quality of both private supplies within Wales and public supplies managed by water companies operating in wholly or mainly in Wales.

Safe, clean drinking water is vital to public health and the wellbeing of our society now and into the future. This is the central tenet of the vision and strategy of the Drinking Water Inspectorate, published in April 2020. It is ever more important in the face of significant challenges to drinking water supplies from the impacts of climate change, and on the quality and availability of water resources, as well as more recently infectious disease such as CoViD-19.

The Inspectorate's work is wide-ranging, covering all aspects of the quality and sufficiency of public water supplies. Drinking Water 2019 provides a record of the work of the Inspectorate in checking that water companies and local authorities have taken the appropriate action to maintain confidence in drinking water quality and to safeguard public health.

The status of water quality in Wales is at a very high standard but work remains to improve planning for future generations:

It is difficult to escape the question of lead pipes. Fifty years after the use of lead pipes was made illegal, the industry has not made significant progress, largely because of the ownership of supply pipes from the property curtilage remains with the householder. The most significant risk of lead dissolving into the water is from where it sits in the last few meters of piping waiting to be drawn from the tap. Consequently, this will continue to be a potential risk to the mental and physical health of current and future generations, until removal of lead from domestic plumbing.

Global challenges such as CoViD-19, coupled with current water resource demand and availability, pose challenges for the maintenance of supply

during these difficult times. Companies in Wales have identified "no supply" as being a key risk. Demand and resource all threaten water quality and sufficiency for which long term planning will be vital to maintain both our industry and our private supplies. We have clear evidence that water resource challenges result in water quality failings, and the choice between sufficiency and quality is not a decision that can be, or should have to be made.

In Wales, discolouration remains the single biggest challenge, with consumer contacts about the appearance of drinking water being almost three times as frequent in Wales than in the wider industry. Compliance failures and unplanned events are dominated by iron from the ageing network. Inevitably, disturbance of iron (from corroding pipes) will cause discolouration which is alarming to see in drinking water and consumers will reject it.

The increasing use of nickel in the manufacture of taps, and their availability on the market as a cheap alternative, is of concern. Individuals sensitised to nickel, (estimated to be 15% of the population, EFSA 2018) can develop an itchy eczematous rash of the skin. Without some control, these increasingly popular fittings are likely to create a future legacy for an increasingly sensitive population. The Inspectorate has been in discussions with WRAS for fittings made of nickel to be identifiable.

Companies are required to provide risk assessments. In 2019, of approximately 80,000 hazards, analysis indicated 91.8% of the risks were being effectively mitigated, which is 2% lower than the wider industry. Turbidity at works and 'no supply' are the top two identified risks.

The annual report provides a summary of 265,394 compliance results taken by the industry, and the associated investigations taken for 76 failures of regulatory standards in Wales. The continuing performance by the industry is measured by the Compliance Risk Index (CRI), designed to allocate a numerical value to risk. A lower value indicates a lower risk. For 2019 the CRI for Wales was 3.73 compared to the wider industry value of 2.87. Dŵr Cymru Welsh Water scored 4 of which three-quarters were due to aesthetic parameters, (Iron, Manganese, Taste, Odour). All failures were investigated and actions carried out to protect consumers. From 2020, companies have a target to achieve an individual CRI of 2 as a common performance commitment.

In 2019, there were 46 events in Wales, where an unexpected failure in the water supply or water quality may not have met the minimum standards expected. Any event which may pose a risk to consumers' water quality and supply is an unacceptable situation, and each and every one is investigated based upon risk. The performance of the industry is measured by the Event Risk Index (ERI), which illustrates the risk arising from these events. A lower value indicates a lower risk. In 2019 the ERI for Wales was 27 which is a year on year improvement. The score for Dŵr Cymru Welsh Water was 26 whilst Hafren Dyfrdwy scored 48. A performance target of 30 would be considered acceptable.

The picture in relation to private water supplies continues to require keen focus, with 6.2% of tests failing to meet the drinking water standards. This represents a stalling of progress when compared with 2018 where 6.1% of tests failed, and a deterioration since 2017, when 4.7% of tests failed. This finding indicates a high risk to consumers and a potential danger to human health.

Across Wales, the number of private supplies that had been risk assessed was 1,456, covering 69% of all relevant private supplies. Risk assessments are valid for five years before being required to be assessed again. Since 2015, there has been a steady year on year decline in the number of valid risk assessments, from 87% in 2015. This represents a high risk to consumers who may drink these supplies and a potential danger to human health.

In 2019, there were 174 supplies in Wales that were a potential danger to human health, where local authorities had to require the owners to make improvements and take steps to protect public health. Around 60% of these failing private supplies are large supplies or supplies where the water is used as part of a commercial or public activity, e.g. B&Bs, cafés and tourist attractions. This is an increase from 2018 and represents a high risk to unsuspecting consumers who use these services.

For context of the challenges faced by local authorities, an example which concerns a supply at a religious site of pilgrimage in Wales is summarised: At this site the water is being used primarily by visitors for healing and spiritual well-being purposes, by means of immersing the body. Historically the water has been provided in 2 pools for this purpose, but until 2019 was also offered for consumption at a dedicated water point. In 2019 the local authority identified that this water was unwholesome in a number of respects and served a section 80 notice until further improvements were made. This demonstrates that private supplies can pose a serious risk to the general public without expedient action such as a risk assessment. Following the assessment, consumers were deterred from using the tap for consuming water by way of a temporary "Do not drink" label attached to it, although the pools remained in use as a religious bathing facility.

Yours sincerely

Marcus Rink

Chief Inspector of Drinking Water