



DRINKING WATER INSPECTORATE

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Information Letter 07/09

To: Board Level and Day to Day contacts of Water and Sewerage Companies and Water Companies in England and Wales

Dear Sir/Madam

SAMPLING DURING SWINE FLU PANDEMIC

Purpose

1. The purpose of this guidance is to advise you of the DWI position and expectations in respect of water companies' responsibilities in meeting the sampling requirements of the Water Supply (Water Quality) Regulations 2000, (2001 Wales) during the swine flu pandemic.

Background

2. This guidance is broadly in line with previous guidance to companies in similar circumstances such as the fuel crisis, (published in 23/2000), and the guidance during adverse weather conditions, (Feb 2009), and is not intended as a replacement for those.
3. On 11 June 2009 The World Health Organization declared Phase 6 of its pandemic alert system, which means that the evidence, the scientific criteria for an influenza pandemic, have been met and swine flu is now spreading in communities in several countries.
4. The WHO's decision to declare a pandemic is based on what is happening globally with the spread of the virus rather than its severity and does not suggest a sudden shift in the UK situation, the majority of cases in the UK so far have not been severe.

Detail

5. The formal declaration of a pandemic should not affect water companies' day-to-day business, including the duty to supply wholesome water and to monitor compliance. The Inspectorate expects companies therefore not

only to have developed a contingency plan to ensure the maintenance of supply of wholesome water, but to have carried out a risk assessment for, and the verification of this, to encompass the sampling and monitoring requirements, (including analysis).

6. The Inspectorate acknowledges that with the gradual increase in the numbers of people affected, where necessary if staff resources are reduced, companies may make greater use of sampling points which are more convenient, (instead of entirely random sampling), in zones to reduce resource in collection.
7. In the unlikely event of a company facing exceptional difficulty in achieving the collection of samples due to a serious shortfall in staff numbers, where staff numbers are reduced by for example >30%, it should ensure that its primary consideration is the protection and maintenance of public health. Priority in such a case should therefore be given to compliance sampling at water treatment works and strategic service reservoirs, and bacteriological sampling in zones. Regular bacteriological sampling in zones, (as opposed to chemical), should not be suspended.
8. The Inspectorate recognises that entry into private properties for the collection of samples may become difficult either because people may be too concerned to allow an external person into their house for fear of contracting flu from them, or because the house is itself a quarantined area. Either way the use of public buildings which are relatively more easy to access and could serve as a fixed sampling point for the duration of the outbreak would provide a platform for reducing the resource of the company both in time and effort and also maintain assurance of water quality to the consumer at the statutory point of monitoring. It is however important to obtain a reasonable picture of water quality throughout zones and routes should also be planned and varied with this in mind. Normal sampling must be resumed as soon as normal conditions return.

Catching up of missed samples

9. In general it is expected that companies will meet their full regulatory sampling programme. Where samples have been missed during any period it is expected that companies will make reasonable effort to re-schedule them before the end of the year. Where shortfalls do occur due consideration will be given by the Inspectorate to the reasons for those shortfalls in deciding whether enforcement action is necessary. The Inspectorate will also acknowledge the role of external conditions

Regulation 13- sampling at treatment works

Where scheduled samples at treatment works were not taken for bacteriological parameters and the sampling frequency is 12 samples per annum it is anticipated that Companies will be able to re-schedule those samples so that the annual sampling frequency requirement under regulation 13 is met. Companies should not re-schedule missed samples

at works where the sampling frequency is 52 samples per annum or greater.

Regulation 14 - sampling at service reservoirs

Companies should not re-schedule missed samples at service reservoirs unless the rescheduled samples can be taken in the same week as the missed samples.

Regulation 9 - sampling in zones

The Inspectorate anticipates that companies should be able re-schedule samples for parameters where the required sampling frequency is 12 samples per year or less.

Regulation 16A - sampling at abstraction points

The Inspectorate recognises that companies may not be able to meet their own frequencies set by risk assessment, which may form a critical control point in their supply system and suggest they are guided in this by their WSP and other controls that they have in place in any particular supply system.

Enquiries

10. Copies of this letter are being sent to Pamela Taylor, Chief Executive, Water UK; Richard Wood, Water Supply and Regulation Division, Department for Environment, Food and Rural Affairs; Olwen Minney, Water Management Team, Welsh Assembly Government; Colin McLaren, Drinking Water Quality Regulator for Scotland; Margaret Herron, Drinking Water Inspectorate for Northern Ireland; Tony Smith and Chairs of the Regional Consumer Council for Water; Kevin Ridout, Ofwat; Tony Warn, Environment Agency; Nigel Harrison, Food Standards Agency; and Frances Pollitt at the Health Protection Agency.
11. This letter is being sent electronically to Board Level and day to day contacts. Please acknowledge receipt by email to dwi.enquiries@defra.gsi.gov.uk. Hard copies are not being sent but the letter may be freely copied. Any enquiries about the letter should be addressed directly to me via the contact details above.

Yours faithfully



Marcus Rink
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