



DRINKING WATER INSPECTORATE

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6 March 2020

Information Letter 01/2020

To: Board Level Contacts of Water and Sewerage Companies and Water Companies in England and Wales

Dear Sir/Madam

Guidance on Drinking Water Supply Operations in Response to Coronavirus (Covid-19)

Purpose

1. The purpose of this letter is to advise water companies of the Inspectorate's position and expectations in respect of water companies' responsibilities in meeting the drinking water quality requirements of the Water Supply (Water Quality) Regulations 2016 (England) as amended by the WSWQ (Amendment) Regulations 2018 and the Environment, Food and Rural Affairs (Miscellaneous Amendments etc.) Regulations 2019 – SI No. 526; and the Water Supply (Water Quality) Regulations (Wales) 2018.

Introduction

2. The novel coronavirus (COVID-19) outbreak is recognised by the Drinking Water Inspectorate (DWI) as a potential challenge to water companies. It is in this context that maintaining and continuing a wholesome supply should be considered as one of the highest priorities.
3. This guidance should be considered when companies are forming their response plan or when responding to the outbreak should there be an escalation.
4. The advice in the letter is specific to mitigating impacts arising from the outbreak outside the control of water companies in a measured and practical way and does not extend to departures from best practice.

The Inspectorate's position

5. The Inspectorate expects water companies to take all possible reasonable steps to continue to supply wholesome water during any outbreak relating to the coronavirus. This applies to all aspects of operational delivery from source to tap.
6. At the time of writing, the current government advice is to continue working as normal but to take simple, sensible precautions such as washing hands more frequently using hot water and soap for 20 to 30 seconds, especially after travelling on public transport, and making sure to 'catch it, bin it, kill it' when we cough or sneeze. Whilst this advice remains, the requirements of the Regulations continue to apply, including those relating to sampling and compliance, monitoring, reporting and any other operation intended to secure the abstraction, treatment, storage and delivery of wholesome water. Additionally, the requirements of the Information Direction relating to non-compliance with the Regulations and to event notification continues to apply, and normal company protocols for managing and reporting events should be adhered to.
7. It is recognised that even in this phase of the outbreak, customer facing staff, especially samplers who visit domestic premises, may experience an increased level of difficulty as fears, rational or otherwise, may impede the normal daily work. As with any workplace situation, a dynamic risk assessment should be made. It would be expected that a sampler would make a reasonable number of attempts to obtain a random sample in the selected area before opting to move to a publicly accessible building from which it may be easier to obtain a sample, or as a further option, to go to a known and accessible sampling location in the zone. The reason should always be documented.
8. Where it proves impossible for reasons related to Covid-19 to take required samples and there is a resulting shortfall, the Inspectorate will not expect the shortfall to be made up, however companies should follow the current procedure and report the reason for the shortfall as Covid-19. As with normal reporting requirements we are expecting companies to report shortfalls in line with the Information Direction.
9. The progress, and potential impacts of, a coronavirus outbreak continue to be monitored by Government, and advice to businesses and citizens is likely to be updated as the circumstances of the outbreak evolve. Current predictions provide a worst case scenario have indicated that up to 80% of the population could become infected, however, it is unclear how this would translate into numbers of people exhibiting symptoms or being off work at a coincident time.
10. Any change of advice may be region specific and could include restricted areas or advice to cease public gatherings. In such a situation it may become difficult or impossible to enter domestic premises or areas. This advice should be followed by water companies and their employees.

Where this situation arises companies should write to their respective liaison inspectors giving circumstance and reason in order for a Notice under Regulation 7 to be issued.

11. The Inspectorate will continue to monitor the potential practical implications for water companies of such advice, and the need to prioritise the health and wellbeing of their staff, whilst maintaining the provision of water supplies.
12. In the case where high levels of sickness impact a water company resources, prioritisation of sampling should be considered, and again the company should write to the liaison inspector for a Notice for a variation on sampling.
13. In all circumstances companies should prioritise the operation of treatment works and continue to monitor critical control points, particularly disinfection and turbidity at water treatment works and any critical control points at service reservoirs. On-line telemetry should always remain in operation to insure the proper operation is running at all times. Sampling priority should be treatment works, service reservoirs and zonal samples in that order.
14. In all circumstances consumer complaints, including discolouration or taste and odour, should be investigated and remedied.
15. Companies should make contingency plans for continuing laboratory services. Where there are impacts on analytical capability, the company should notify the liaison inspector. In all circumstances, microbiological analysis including *Cryptosporidium spp.* should be prioritised.
16. Managing any potential interruptions to the supply of treatment chemicals and general supply chain services for routine operation and maintenance activities remain a priority. Any risk of interruption should be notified to the liaison inspector.
17. I would also draw your attention to the long standing guidance in place for managing impacts and interruptions to water supplies, including the Inspectorate's "Guidance to health and water professionals", on this link: http://www.dwi.gov.uk/stakeholders/information-letters/2009/09_2009Annex.pdf

Regulatory Duty

18. Water companies are reminded that they remain responsible under The Act and The Regulations to provide sufficient and wholesome water at all times. This guidance does not relieve this obligation.

Enquiries

19. Any enquiries regarding this letter should be made to Martin Bird by email to martin.bird@defra.gov.uk

Copies of this letter are being sent to Christine McGourty, Chief Executive, Water UK; Jan Dixon and Kirstin Green, Deputy Directors Water Quality, Department for Environment, Food and Rural Affairs; Eifiona Williams, Water Management Team, Welsh Government; Sue Petch, Drinking Water Quality Regulator for Scotland; Catriona Davis, Drinking Water Inspectorate for Northern Ireland; Tony Smith and Chairs of the Regional Consumer Council for Water; Alison Cullen, Ofwat; Simon Moody, Environment Agency; Benedict Duncan, Food Standards Agency; and Stephen Robjohns at Public Health England.

This letter is being sent electronically to Board Level and Day to Day contacts. Hard copies are not being sent but the letter may be freely copied.

Yours faithfully,



Marcus Rink
Chief Inspector