



## DWI PR14 Guidance – Water Resource Planning

### 1. Background

- 1.1 The Inspectorate welcomes the efforts of water companies to manage the long-term sustainability of water supplies for the benefit of both water consumers and the environment, and to reappraise, and strengthen where necessary, all aspects of the resilience of their water supply arrangements.
- 1.2 An important part of such work is the development of Water Resource Management Plans. The Inspectorate does not have a direct role in the appraisal of these Plans, but at the request of individual companies we have had informal discussions about drinking water quality matters arising from the Plans. The implications for drinking water quality are generally well exposed and understood, but sharing our observations with all companies would appear to be a useful and timely reminder of the importance of public health protection, wholesomeness and public confidence in drinking water quality to the legitimacy of every company's WRMP.

### 2. Guidance for Companies

- 2.1 Under section 68 of the Water Industry Act 1991, a water company has a statutory duty to supply wholesome water. Wholesomeness requirements are set out in the Water Supply (Water Quality) Regulations 2000 (in England) and the Water Supply (Water Quality) Regulations 2001 (in Wales), and associated amendments. Guidance on these requirements for PR14, together with the requirements for assessment and management of risks to public health from public water supplies are given in [Information Letter 01/2013](#) dated 1 February 2013.
- 2.2 Section 68(1)(b) of the Act also places the following duty on a company that may have implications for how it develops its WRMP:

*It shall be the duty of a water undertaker.....*

*so far as reasonably practicable, to ensure, in relation to each source or combination of sources from which water is so supplied, that there is, in general, **no deterioration** in the quality of the water which is supplied from time to time from that source or combination of sources.*

- 2.3 This duty may have an impact on the WRMP development process both for transfers of water within a company's supply area, and for exports and imports across company boundaries. Two general principles to take account of are as follows:
- a. that the company should not expose consumers to a greater risk of exposure to unwholesome water, and
  - b. that the company must not plan to fail.
- 2.4 Specific matters for consideration should include (where relevant) the following:

- a. For all water transfers, both within a company's area and across boundaries, and for new sources, the company is expected to have carried out risk assessments of the potential impacts on public health, consumers and wholesomeness, and must meet the requirements of regulation 15, as set out in guidance to the regulations and [IL 06/2012](#).
- b. The company should be satisfied that the risk assessment has considered the potential impact of mixing of different water types within its distribution network, including customer acceptability issues and the operation and maintenance requirements of that particular network (e.g. for event mitigation, water stability and age and service reservoir turnover).
- c. Routine operational matters to be included in these risk assessments should include assessment of the impact on optimisation of phosphoric acid dosing, pH and colour for plumbosolvency control; fluoridation practices; other chemical stabilisation processes; and compliance with the disinfection byproduct rule.
- d. Transfers of water, or commissioning of new sources, that increase the risk of non-compliance, such as by discolouration, nitrates or pesticides, should not be permitted until steps to mitigate those risks are in place.
- e. Where a new supply replaces an existing supply from a source that is then to be abandoned or not available due to changes to an abstraction licence, the cost benefit of the proposal must include the whole life costs of managing the quality of the new supply, including treatment costs, pumping costs and network maintenance costs.
- f. It is the responsibility of the company receiving a transfer to satisfy the requirements of regulation 15 and ensure compliance with the Regulations. The recipient company must complete a risk assessment for the water supply (source to tap). If the recipient finds that the supply is already in use by the supplying company, it must seek and obtain relevant information from the supplier to complete its risk assessment. If the water is already in supply, the arrangement would be subject to regulation 15(1)(b) requirements only. In all other circumstances the requirements of regulation 15(1)(a) will apply. The risk assessment would also need to be informed by sampling carried out by the receiving company in accordance with 15(2)(aa) and (bb) as well as 15(3)(b). Where a new connection/transfer operates in both directions, both receiving companies should submit regulation 28 reports for the relevant supply systems, plus the associated regulation 15 sampling programme results as soon as is reasonably practicable.

2.5 It continues to be the duty of a company's Board Level contact to personally confirm the integrity of the risk assessment process put in place by the company for all of its water supplies.

### **3. In summary**

3.1 Effective, straightforward, enforceable arrangements are in place to enable a water company to manage its supply arrangements from source to tap to protect consumers and mitigate the risks of non-compliance. The Inspectorate considers that the continued application of these arrangements will address the drinking water quality issues arising from Water Resource Management Plans.

For further information on this guidance, please contact Jacqueline Atkinson, Inspector, Telephone Number: 0300 0686402; email: [jacqueline.atkinson@defra.gsi.gov.uk](mailto:jacqueline.atkinson@defra.gsi.gov.uk)