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Your ref:
Our ref: B2987644

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INFORMATION LETTER 2/2009

Dear Peter

SAMPLING ACTIVITIES DURING A PANDEMIC FLU OUTBREAK

Purpose

1. The purpose of this letter is to advise Scottish Water (SW) of the DWQR's position and expectations in respect of SW's responsibilities in meeting the sampling requirements of the Water Supply (Water Quality) (Scotland) Regulations 2001 during an outbreak of pandemic flu.

2. The World Health Organisation (WHO) has defined phases in the evolution of a pandemic. If a pandemic is declared by WHO, action by SW will depend on whether cases are identified in the UK and the extent of the spread. The UK has four alert levels consistent with those used for other communicable disease emergencies. They are:

Alert Level 1: Virus/cases only outside the UK

Alert Level 2: Virus isolated in the UK

Alert Level 3: Outbreak(s) in the UK

Alert Level 4: Widespread activity across UK

It is anticipated that this letter would only be activated at Alert Level 3 or higher.

Supply of wholesome water

3. The DWQR expects SW to take all reasonable steps to continue to supply wholesome water and to verify that this is the case through its routine sampling programme, as far as circumstances allow.

4. SW are expected to adopt a "common sense" approach that recognises both the need to maintain water quality in order to protect public health and the need to minimise the risk of transmission of disease.

Sampling

5. The DWQR recognises that during a pandemic flu outbreak, the ability of SW to take the samples required by the Regulations may be compromised by a lack of available staff and the refusal of consumers to allow entry to samplers. It is also recognised that any absence of staff may place significant burdens on those staff remaining at work and that SW will have to be responsive to local circumstances. In the event of there being clusters of flu cases in Scotland at Alert Level 2 which lead to concern from either SW staff or consumers regarding entry to consumers' properties, SW should contact DWQR to discuss individual situations.

6. It is anticipated that there will be a staged approach to any reduction in sampling frequencies in the event of a pandemic flu outbreak. This paragraph outlines sampling requirements and arrangements required during an actual pandemic flu outbreak.

Alert Level 3

- Stop all sampling from water supply zones.
- Continue routine sampling and analysis at water treatment works in accordance with regulation 13 of the Water Supply (Water Quality) (Scotland) Regulations 2001 (the "Regulations").
- Continue routine sampling and analysis at service reservoirs in accordance with regulation 14 of the 2001 Regulations.
- Transfer all zonal sampling to service reservoirs. In practice, this will mean taking any samples which would have been taken from a zone at the service reservoir that supplies that zone. It is acknowledged that this may result in two microbiological samples for the same parameters being scheduled at the same time. In this situation it is acceptable for one of these samples to be taken, but it is important that the sample is clearly identified as being both the service reservoir sample and the zonal sample.
- SW must ensure that all relocated samples and cancellations are clearly identified as being as a result of a flu pandemic.

Alert Level 4

- No sampling from water supply zones.
- Continue routine sampling and analysis at water treatment works in accordance with regulation 13 of the 2001 Regulations.

- Continue routine sampling and analysis at service reservoirs in accordance with regulation 14 of the 2001 Regulations.
- Transfer all zonal sampling to service reservoirs. In practice, this will mean taking any samples which would have been taken from a zone at the service reservoir that supplies that zone. It is acknowledged that this may result in two microbiological samples for the same parameters being scheduled at the same time. In this situation it is acceptable for one of these samples to be taken, but it is important that the sample is clearly identified as being both the service reservoir sample and the zonal sample.
- If SW are unable to complete any sampling due to staff being affected by pandemic flu, agree reduction in monitoring with DWQR where necessary.
- SW must ensure that all relocated samples and cancellations are clearly identified as being as a result of a flu pandemic.

Recovery

- Normal regulatory sampling programmes shall resume as soon as possible.
- Where samples have been missed due to pandemic flu, it is expected that SW will make reasonable effort to re-schedule them before the end of the calendar year where the annual sampling frequency prescribed in the 2001 Regulations is 12 samples per year or less.

Public Reporting

7. DWQR will acknowledge the exceptional circumstances pertaining at the time of a pandemic flu outbreak in reporting any sampling shortfalls in the Annual Report and any other public reporting.

8. Enquiries on this letter should be addressed to Colette Robertson-Kellie (Regulation Manager) Colette.robertson-kellie@scotland.gsi.gov.uk on 0131 244 0278.

9. A copy of this letter is being sent to Colin Ramsay, Health Protection Scotland.

10. Please acknowledge receipt by email to regulator@dwqr.org.uk.

Yours sincerely

Dr Colette Robertson-Kellie
Regulation Manager