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Your ref:
Our ref: B2342572
4 September 2008

Information Letter 4/2008

Dear Mr Brown

CHANGES TO THE APPROVAL OF DISINFECTANTS FOR EMERGENCY USE

Purpose

The purpose of this letter is to advise Scottish Water of changes in the way disinfectants for emergency use are approved. It does not affect the approval of disinfectants for other uses.

Background

Products are used in the continuous disinfection of public water supplies on the basis that they meet the requirements of Regulation 27(3) or Regulation 27(4)(a) of the Water Supply (Water Quality) (Scotland) Regulations 2001 (usually through conformity with appropriate EN standards). In some emergency situations, however, it may be appropriate to consider the use of other disinfectant products as part of the emergency response to an incident in a public water supply. The "List of Approved Products for use in public water supply" (the List) contains details of disinfectants considered suitable for consideration for such emergency use (section A.6 – Disinfectants for Emergency Use).

A new risk-based approach to the use of disinfectants in an emergency is now being introduced, and section A.6 of the List will be deleted and the appropriate approvals revoked, with effect from 16 March 2009.

These products will in future be used under the provisions of Regulation 27 (4)(b) using the procedure described below. The detailed procedure and further background to this change can be found on the Drinking Water Inspectorate's website – <http://www.dwi.gov.uk/31/pdf/Advicesheet9.pdf>

Use of emergency disinfectants

Scottish Water are reminded that if a disinfectant, not permitted under Regulation 27 is introduced into water, or if a product that is permitted is used in a manner outside its authorised conditions of use, an offence may have been committed. In the situation where it is appropriate to use an unapproved product (disinfectant) or to use an approved product in an unapproved way, Regulation 27 (4)(b) requires that Scottish Ministers are satisfied that the introduction of the product is unlikely to adversely affect the quality of the water.

The new procedure is designed to ensure that Scottish Ministers (in practice the Drinking Water Quality Division (DWQD) acting on their behalf) is able to make an informed decision. Key points are:

- The initial decision to use an emergency disinfectant, and the choice of disinfectant is made by Scottish Water following a full risk assessment
- Use of the disinfectant must be in accordance with a specific method statement
- The DWQD must be provided with specified information two weeks in advance of each use
- The DWQD will inform Scottish Water if it is of the opinion that the proposed use does not comply with the requirements of Regulation 27 (4)(b)
- Accelerated procedure for use in case of urgent need for application of the emergency disinfectant

Action by Scottish Water

Until the approvals are revoked on 16 March 2009, Scottish Water may continue to use products listed in section A6 of the List in accordance with their conditions of approval. Alternatively they may use an emergency disinfectant, whether or not it is listed, in accordance with the requirements of Regulation 27(4)(b), provided they follow the new risk-based procedure.

After 1 March 2009, all use of emergency disinfectants must be in accordance with the new procedure.

Enquiries

Any enquiries regarding this letter should be made to Philip Anderson (telephone 0131 244 0188 or by email to Philip.anderson@scotland.gsi.gov.uk).

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

Please acknowledge receipt by email to drinkingwater@scotland.gsi.gov.uk. This letter may be freely copied.

Yours sincerely

Philip Anderson
Operations Team Leader