

Drinking Water Quality Regulator for Scotland

T: 0131 244 0186 | F: 0131 244 0211  
E: [regulator@dwqr.org.uk](mailto:regulator@dwqr.org.uk)  
[www.dwqr.org.uk](http://www.dwqr.org.uk)



To:  
Douglas Millican  
Chief Executive  
Scottish Water  
Castle House  
6 Castle Drive  
DUNFERMLINE  
KY11 8GG

11 March 2020

Dear Douglas,

## Information Letter 1-2020

### **Sampling and Other Activities During a COVID-19 Coronavirus Outbreak**

The purpose of this letter is to communicate DWQR's expectations in respect of Scottish Water's regulatory responsibilities during any significant outbreak of COVID-19 coronavirus.

World Health Organisation guidance (<https://www.who.int/publications-detail/water-sanitation-hygiene-and-waste-management-for-covid-19>) indicates that COVID-19 cannot survive in disinfected drinking water and therefore is not transmitted in this way. However, any widespread outbreak potentially presents significant challenges for Scottish Water in meeting its regulatory duties under The Public Water Supplies (Scotland) Regulations 2014 (the Regulations), both in terms of staff absence and restricted access to consumers' properties to collect regulatory monitoring samples and investigate consumer complaints.

DWQR considers that Scottish Water's overarching priority is the protection of public health, and it must act accordingly, irrespective of the contents of this letter, in what is expected to be a rapidly changing situation. All reasonable measures must be taken to ensure a consistent supply of wholesome water is maintained, and that

Area 3-F South  
Victoria Quay  
Edinburgh  
EH6 6QQ



wholesomeness is verified as far as possible in line with the Regulations, balancing this against the need to protect Scottish Water staff and minimise the transmission of the virus.

The DWQR recognises that during a significant outbreak of disease, the ability of Scottish Water 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 Scottish Water will have to be responsive to local circumstances. It is therefore appropriate that alternative plans are in place in advance of an outbreak to ensure the quality of supplied drinking water is verified should circumstances warrant it. Regular, ongoing contact between Scottish Water and DWQR will be required to discuss individual situations. It is possible that measures could be implemented in parts of Scotland rather than across the whole country, should this be appropriate.

### During an Outbreak

It is anticipated that there shall be a staged approach to any modification of regulatory sampling programmes in the event of a widespread outbreak of disease. This will be based on a hierarchical approach to sampling with the maintenance of representative sampling of water treatment works final waters being paramount.

**In the event of widespread outbreak of disease and/or government guidance recommending social distancing of broad sections of the community, the following measures may be introduced by Scottish Water with agreement from DWQR:**

- Cease water sampling from consumers' taps;
- Regulatory supply zone sampling to commence from storage point outlets in the relevant water supply zone, maintaining correct sampling frequencies and ensuring, as far as possible, a geographical and temporal spread of samples;
- In small water supply zones with no storage, zonal samples may be taken from the relevant treatment works final water sample points;
- Such samples will be in addition to the routine regulatory sampling required from storage points;
- Following lifting of the measures described above, the samples taken shall count for regulatory compliance assessment purposes, with the exception of plumbing metals (lead, copper and zinc), which are pertinent to consumers' taps. Annual test numbers for these parameters shall be caught up, as far as possible, within the remainder of the regulatory reporting year.

**In the event that significant numbers of Scottish Water sampling, transportation or analytical staff are absent to the extent that the sampling measures described above prove unachievable:**

- Regulatory sampling for supply zones will be undertaken from water treatment works final water taps at as close to the required frequency as possible;
- This will be in addition to regulatory treatment works monitoring;
- Where the number of absent analytical staff is so great that, even if samples are collected, full analysis is not possible, testing shall be prioritised, reallocating appropriate staff if necessary;
- Priority shall be given to microbiology, Cryptosporidium and general chemistry, although capability for trace organics analysis will be vital for responding to consumer contacts and incidents;
- Where analytical staff are not trained for the specific analytical method they are performing on a temporary basis, accreditation should be removed from the reported result, although DWQR will accept the regulatory result provided an appropriate level of general competence and/or supervision is maintained;
- If courier networks are severely affected it is possible that samples may take longer to arrive at the analysing laboratory, potentially outwith stability times. Scottish Water is expected to make efforts to minimise this situation as far as possible, but where unavoidable, to make an assessment of the representative nature of the sample and the benefit or otherwise of analysing it.

Regardless of the scenarios above, it is expected that Scottish Water will continue to investigate consumer complaints and sample failures in a manner that ensures consumer and water quality interests are protected. It is acknowledged that normal procedures may need to be modified to suit specific circumstances. In some cases it may be acceptable to postpone sampling in relation to certain non-urgent enquires, such as lead, provided the consumer is given appropriate advice in the meantime.

### Recovery

Normal regulatory sampling programmes shall be resumed as soon as possible. The timing will be based on government advice, and DWQR will continue to communicate expectations and discuss issues with Scottish Water.

DWQR will acknowledge the exceptional circumstances pertaining at the time of any outbreak of COVID-19 in reporting any unavoidable sampling or analytical shortfalls in DWQR's annual report and any other public reporting.

Enquiries concerning this letter should be addressed to Matt Bower ([matthew.bower@gov.scot](mailto:matthew.bower@gov.scot)).

A copy of this letter has been sent to Dr. Colin Ramsay (HPS), Alan Sutherland (Water Industry Commission) and Bob Irvine (Water Industry Division, Scottish Government).

Yours sincerely,

*Sue Petch*

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