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Health effects from chlorine

10 February 2020

DWQR Inspector:  
Moira Malcolm

## Basis of complaint

The chlorine content in the drinking water supplied by Scottish Water was contributing to the health concern of the complainant.

## Context of complaint

The consumer made several requests for information to Scottish Water from February 2019 when they reported illness attributed to high levels of chlorine in the supply and requesting information.

Despite Scottish Water taking a samples for analysis and explaining the reasons for the particular levels of chlorine found, and further communications between the complainant and Scottish Water, the consumer remained dissatisfied with the response. A formal complaint was made to Scottish Water on 13 January 2020 identifying the particular concerns: that Scottish Water were not providing complete information regarding the supply; and not fully answering the questions posed.

## DWQR Assessment of complaint and the actions taken

The complainant contacted Scottish Water with a Freedom of Information request on 11 March 2019 regarding the treatment chemicals used at the water treatment works (WTW) and the quantity of chlorine used in the water supply. Scottish Water responded in 13 working days later under The Environmental Information (Scotland) Regulations 2014 and provided the complainant with the information requested. The Scottish Information Commissioner has responsibility for overseeing Freedom of Information and Environmental Information requests, however DWQR is content that the water quality information provided was accurate.

By their nature FOI requests are factual and must not contain opinion. However DWQR is disappointed that the correspondence received in response to the FOI request was not given any context in which the complainant could interpret it – especially as Scottish Water were aware of the complainant's concerns regarding their health and the drinking water prior to receiving the FOI request.

The WTW supplying the complainant was recently rebuilt, with water from the new WTW going into supply in November 2018. The quality of the water from the new WTW is significantly improved, the amount of residual chlorine leaving the WTW is lower than that of the old WTW and more consistent.

There is no upper regulatory limit for chlorine in Scottish legislation, although there is a requirement on Scottish Water to minimise any disinfection by-products, thereby ensuring that only the amount of chemicals required to disinfect the water to the end of the network are used. The World Health Organisation sets a guideline value for (free) chlorine in drinking water of 5mg/l, which relates to lifetime exposure and therefore is the amount that WHO have determined is safe to drink every day for a person's life without ill effects. Public Health Scotland have set a short term health risk value of 3mg/l. As the complainant is receiving only

18% of the total dose deemed safe by health professionals, DWQR therefore cannot conclude that the amount of chlorine the complainant is exposed to from the drinking water is excessive.

The complainant made further requests for information regarding the health effects noticed since the WTW was upgraded. Scottish Water replied within reasonable timescales to these requests. They provided information on water quality to a standard which DWQR finds acceptable. They did not confirm the diagnosis of a chlorine allergy as they are not medical professionals and this is not within their remit to do so. Instead Scottish Water referred the complainant to their GP and the local NHS health authority for clinical diagnosis which DWQR considers to be an appropriate response.

DWQR is satisfied that Scottish Water has established that its supply meets the regulatory requirements and the amount of chlorine in the supply is being maintained at a suitable level. DWQR does not uphold the complaint, though one recommendation has been made.

## Recommendations

DWQR recommends that Scottish Water:

1. Ensure all correspondence to consumers is holistic and takes into account previous communications.

