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Dear Douglas

Information Letter 2 / 2020

DWQR Requirements for the Reporting of Water Quality Events

1. Purpose

The purpose of this letter is to update Scottish Water on DWQR's requirements for the reporting of events relating to drinking water quality. It updates the requirements set out in ILs 3 / 2012, 4 / 2012 and 3 / 2014.

2. Introduction

2.1 The Public Water Supply (Scotland) Regulations 2014 require Scottish Water to report events affecting drinking water quality to DWQR. Prompt and accurate reporting of events is vital as this enables DWQR to assess each event and investigate any incidents while information is still freely available. The process has generally worked well, with acceptable levels of information being provided about events, although timeliness of event outcome information has recently been a concern. This letter aims to reinforce requirements already issued to Scottish Water as well as clarifying expectations with regard to the additional information required for incidents.



3. Event Reporting

3.1 Outcome Notifications

Most current issues concern outcome notifications. It is expected that all water quality events will be fully investigated and, in most cases, concluded with an outcome notification provided within 30 days of the start of the event. This timescale should only be exceeded in exceptional circumstances.

Outcomes should be provided when the root cause of the event is understood. It is not acceptable to keep events open beyond the 30 day limit to track the progress of ongoing works (e.g. flushing activities). This tracking is an internal Scottish Water activity and should be monitored outwith the event notification process.

3.2 Outcome Notifications

Outcome notifications must:

- Clearly carry the text "OUTCOME" in block capitals at the start of the final notification;
- Carry full details of the operational and sampling responses and the subsequent investigation undertaken;
- Clearly specify the impact on the quality of water supplied to consumers;
- Where the event involves a failure of disinfection, clearly reference the Ct achieved during the incident and any significant findings from Scottish Water's site-specific disinfection strategies as required by DWQR;
- For lead failures, the outcome should provide information on the status of orthophosphate dosing in the supply and a summary of Scottish Water's investigation into communication and supply pipe materials (this is expected to have been completed within the 30 days);
- Public building failures should be clearly marked as such and contain a report of the investigation that was carried out under Regulation 19(3) of the Regulations, with adequate detail to provide a clear understanding to Local Authority Public Health Teams of the cause and extent of the failure conditions within the premises.

3.3 Update Notifications

Update notifications are used to provide further information on a developing situation, where there is insufficient information to close the event and provide an outcome. Closure of events via outcome notices within 30 days should minimise the need for update notifications.

Update notifications should be used where material information comes to light in a significant water quality event that was not available at the time of the initial notification. In significant, ongoing, events it may be necessary to provide a number of updates. This will especially be the case where large populations are affected or there is significant media interest.

Update notifications may be used where an outcome is not possible within 30 days, in order to provide information on the reason for the delay and the expected date for the outcome. This scenario is expected to be the exception rather than the rule. An update must be provided, as a minimum, every 30 days until the outcome notification is available.

3.4 Supporting Information

Where required, additional information to clarify or expand on the issues behind an event should be provided under cover of an email to the DWQR mailbox: Drinking_Water@gov.scot. The title of the email should clearly contain the name and number of the event to which it relates. Such information e.g. files of consumer contacts, sample results, investigation reports, photographs, trends from process monitoring, etc. are invaluable in gaining a better understanding of a problem and Scottish Water's response to it.

4. Water Quality Incidents

DWQR will continue to assess water quality events using the established matrix that has been provided to Scottish Water. Where an event is declared an incident, Scottish Water's regulation team will be notified by email. From 1 July 2020, **all incidents declared by DWQR will require a full report**, either to accompany the outcome notification or within 28 days of the declaration of the incident by DWQR. Exact requirements may be varied by the DWQR inspector to account for special circumstances.

It is expected that incident reports will be delivered to DWQR by the stated deadline. If, due to exceptional circumstances, the incident report is likely to be late, Scottish Water must seek an extension of the delivery date. The application for extension must be submitted in writing to the relevant DWQR inspector and copied to the general DWQR mailbox, Regulator@dwqr.scot, outlining the reason for the delay and the period of time sought. An agreed date will be confirmed by DWQR, and this must be met.

5 Monitoring and Reporting of Event Notification Compliance

DWQR will be monitoring compliance with the above process closely. Additionally, the timeliness of both event outcome notifications and incident reports will be reported in the DWQR Annual Report. As the reporting of water quality events is a regulatory requirement, significant and persistent non-compliance will place Scottish Water at risk of enforcement action.

Yours sincerely,



Matthew Bower
Operations Team Leader
Drinking Water Quality Regulator for Scotland