

Irish Water Interim Drinking Water Quality Policy

1. Introduction

The following extract from Irish Water's Vision Statement sets the context for our Drinking Water Quality Policy:

... Ireland has a world class water infrastructure that ensures secure and sustainable water services, essential for our health, our communities, the economy and the environment.

2. Scope

This Drinking Water Quality Policy applies to employees, contractors, Design Build Operate (DBO) contractors, suppliers and local authority staff working under Service Level Agreements (SLA) with a role in water supply and will be taken into account in all aspects of water supply delivery.

3. Commitment & Responsibilities

Irish Water is committed to delivering safe and secure drinking water supplies for our customers.

Irish Water is committed to complying with all applicable legal and statutory requirements related to drinking water and in particular the European Union (Drinking Water) Regulations 2014 (S.I. No. 122 of 2014)(the drinking water regulations).

Irish Water will strive to:

- Undertake compliance monitoring and reporting in accordance with the requirements of the drinking water regulations.
- Undertake improvements on Water Supply Zones (WSZ) included in the EPA's Remedial Action List such that all supplies can be removed from the list on a prioritised basis. Irish Water will also prioritise improvements on supplies with a boil water or water restriction notice in place.
- Develop and implement Water Safety Plans on a phased and prioritised basis across all WSZs.
- Implement best practice drinking water hygiene, supported by appropriate training, for all personnel working on water supply, including employees, contractors, Design Build Operate (DBOs) contractors, suppliers and local authority staff working under Service Level Agreements (SLAs).
- Take account of best practice and various guidance documents published by the EPA and World Health Organisation (WHO) related to drinking water quality:
 - European Communities (Drinking Water) (No.2) Regulations 2007 (S.I. 278 of 2007) - A Handbook on the Implementation of the Regulations for Water Services Authorities for Public Water Supplies, EPA, April 2010
 - Water Treatment Manual: Disinfection, EPA, 2011
 - Drinking water advice notes, published by the EPA

- Guidelines for drinking water quality, 4th ed, WHO, 2011
- WHO resource materials on water safety plans

3.1 Parameters in Drinking Water Regulations with no Parametric Value

There are a number of indicator parameters in the drinking water regulations for which no parametric value is stated. Typically, the requirement for such parameters is stated as “Acceptable to consumers and no abnormal change”. For these parameters, Irish Water will take account of best practice, including any guidance and advice issued by the EPA and WHO and technical and economic considerations.

3.2 Cryptosporidium

While there is no parametric value for cryptosporidium in the drinking water regulations, it is a factor in determining whether water shall be regarded as wholesome and clean under Regulation 4(2)(a), that is:

“..it is free from any micro-organisms and parasites and from any substances which in numbers or concentrations, constitute a potential danger to human health”

Ireland has the highest reported incidence rates for cryptosporidiosis in Europe and public water supplies have been the pathway for infection in a number of instances. Irish Water is committed to the provision of safe and secure drinking water supplies that minimise risk of cryptosporidiosis through a number of actions:

- Using a risk based approach to management of cryptosporidium in drinking water supplies
- Implementing best practice methodologies, taking account of the following:
 - EPA Drinking Water Advice Note No. 9: Cryptosporidium Sampling & Monitoring
 - EPA Disinfection Manual
 - EPA Handbook
- Improving source protection through active engagement with relevant stakeholders, including the IFA and Local Authorities
- Using appropriate treatment methodologies and improvement of physical barriers
- Ensuring that appropriate monitoring is undertaken
- Engaging with the EPA and HSE on a framework for the use of UV as a tool in mitigation of risk from cryptosporidium.
- Developing a better understanding of waterborne cryptosporidiosis in an Irish context through appropriate research and engagement with international water utilities and experts.

3.3 Fluoridation

Irish Water is committed to fluoridating water supplies as required and funded by the HSE, whilst meeting the requirements of the drinking water regulations on the parametric value for fluoride. The requirements for fluoridating public water supplies are set out in the Health (Fluoridation of Water Supplies) Act 1960 and the Fluoridation of Water Supplies Regulations 2007 [S.I. No. 42 of 2007]. Following the commencement of the Water Services (No. 2) Act 2013, fluoridation of public drinking water supplies is undertaken by Irish Water as agent for the HSE. Irish Water will work with the HSE to implement State policy on fluoridation and will install and operate fluoridation systems at all public water supplies as required and funded by the HSE.

Under the drinking water regulations, the current limit for fluoride in public water supplies is as follows:

(a) fluoridated supplies - 0.8 mg/l

(b) supplies with naturally occurring fluoride, not needing further fluoridation - 1.5 mg/l

The upper limit for fluoride in the Directive 98/83/EC (drinking water directive) is 1.5 mg/l and, accordingly, the limit for fluoridated water supplies in Ireland of 0.8 mg/l is below the limit set in the drinking water directive.

3.4 Hardness

Hardness is determined by the level of naturally occurring calcium and magnesium compounds water contains. Source waters with a high calcium and magnesium content are considered to be hard, and those waters with a low content are considered to be soft. Depending on the local geology the hardness of the water supply scheme will vary.

There is no reference to hardness in either the drinking water directive or drinking water regulations. However, the impact of hardness in drinking water is considered in the WHO Guidelines for drinking water quality, 4th ed, 2011. The WHO Guidelines state that hardness in drinking water is not of health concern at the levels found in drinking water but acknowledges that it may affect acceptability.

On the basis of the above, it is Irish Water policy not to install systems to artificially soften water as part of the water treatment process.

3.5 Provision of Information to Consumers

Irish Water is committed to the provision of information to its customers as required under the drinking water regulations, including the following scenarios:

- Where non-compliance, or risk of non-compliance, is due to the domestic distribution system (Regulation 6(5))

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- Where in consultation with the HSE, Irish Water considers that a supply of water intended for human consumption constitutes a potential danger to human health it will ensure that consumers are informed promptly thereof and given the necessary advice (Regulation 9(1))
- Where remedial action is taken in relation to a water supply (Regulation 10(9))

As an interim measure, local authorities will continue to publish information on drinking water quality on their websites. Notwithstanding, Irish Water is committed to publishing this information on the Irish Water website in an integrated way across all water supplies zones as soon as the required systems and processes are in place.

3.6 Lead

Irish Water will develop a policy on lead in drinking water taking account of the Joint Position Paper on Lead (Pb) in Drinking Water, published by the EPA and HSE in December 2013..

4. Ownership and Implementation

Overall responsibility for the Drinking Water Quality Policy is with the Asset Strategy & Sustainability Manager. The Water Supply Strategy Lead is the delivery lead, with responsibility for implementation of the policy in Irish Water.

5. Communication of Policy

This Policy will be communicated to all employees working on water supply and will be reflected in the protocols, specifications and other relevant documents that are issued to contractors, Design Build Operate (DBOs) contractors, suppliers and local authority staff working under Service Level Agreements (SLA).

6. Policy Assessment, Review and Improvement

The Policy will be reviewed annually and assessed to ensure that it is relevant, up to date and compliant with best practice and current legislation. It will be reviewed more frequently if required and improved and amended as necessary.

7. Implementation Date

This Policy is effective from the 1st January 2014.

Jerry Grant,

Head of Asset Management, Irish Water

Date

List of Abbreviations

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DBO Design Build Operate
EPA Environmental Protection Agency
IFA Irish Farmers' Association
SLA Service Level Agreement
WHO World Health Organisation