

Joint Oireachtas Committee on Housing Planning & Local Government

Committee Meeting 21st March 2018

COM (2017) 753: Proposal for a Directive of the European Parliament and of the Council on the quality of water intended for human consumption (recast)

Opening Statement on behalf of Irish Water

Introduction

My name is Michael O'Leary and I am Head of Environmental Regulation for Irish Water. I am joined today by Mr. Sean Laffey, Head of Asset Management. I would like to thank Ms. Maria Bailey, TD and the Joint Committee for the opportunity to present our observations on the Proposal for a Directive of the European Parliament and of the Council on the quality of water intended for human consumption.

It is not my intention to repeat the observations given by previous presenters to this committee but rather I wish to offer the viewpoint of a provider of public water services and comment on the potential effects on the operation of water services and the delivery of capital programmes by Irish Water should the draft Directive, as presented, be adopted and subsequently transposed into Irish law. Notwithstanding any views or comments offered to the committee today Irish Water, as a public utility, will take any actions required to implement future changes made in law regulating the production and supply of drinking water.

The current legislation that regulates the quality of drinking water is based on legislation that is now 20 years old. We welcome the proposed revision of the standards and the approach to the supply of water which reflects the greater understanding that has been gained over that time about how we manage our natural resources.

Article 7 proposes to formally introduce a risk-based approach to the management of bodies of water used to supply our treatment plants. This approach is one which Irish Water is currently utilising and reflects best practice worldwide. However the emphasis in the proposed legislation is on the identification of hazards in a catchment serving a treatment plant and the monitoring of pollutants. In our opinion, for completeness, any enacted legislation transcribing this proposal should also include some provision for action to be

taken to regulate, remove or mitigate identified hazards. Any hazards to drinking water quality identified are much more effectively and economically addressed at source rather than through the treatment process at the water treatment plant.

Article 10 proposes that each member state ensures that a distribution risk assessment is performed for domestic properties. Under current legislation Irish Water is required to test for water quality at the point of consumption i.e. the customers tap with the responsibility for the condition of internal plumbing residing with the property owner. This proposal fundamentally alters this position and may result in owners being required to carry out remedial actions to the water distribution systems in properties they own.

With respect to Article 13, access to water intended for human consumption, we will fully support whatever measures are enacted in law.

Irish Water already provides a great deal of information on the quality of the drinking water we provide across all of our water supply zones. We believe that provision of this type of information is critical to the confidence that the public have in the water that they are consuming and we make such information freely available on our website. However the provisions as set out in Article 14 are very detailed and may, in certain circumstances, be very difficult, if not impossible to comply with. For instance the requirement to provide a household with the volume consumed on a yearly basis will not be possible where a household is not metered or where an address is located in an apartment block where water consumption data is supplied on a bulk meter basis to the management company.

The proposed changes to the limits of current parameters used for water quality testing and the addition of new parameters will have two main effects. Firstly the introduction of new testing parameters will result in increased costs and may require Irish Water to significantly alter proposed capital investment plans to meet non-compliances with those parameters. Secondly the reduction of limits for existing parameters will, in some instances, fundamentally affect our current agreed treatment strategies. Of note is the proposed reduction in the lead limit from 10 microgrammes per litre to 5 microgrammes per litre. Irish Water's strategy currently is to introduce ortho-phosphate dosing as a short to medium solution to high lead levels with a long term plan to remove all lead connections. A reduction in the levels as proposed will result in the ortho phosphate solution being insufficient with a move to lead removal at a substantially increased short term cost. This would result in a collateral effect on other investment priorities. Additionally it has been recognised that even

in properties with no lead plumbing brass fittings can give rise to lead levels in excess of 5 micro grammes per litre which may necessitate some internal re-plumbing of properties.

In summary the adoption of the new proposals as set out in the revised directive will have three main effects on our operations and capital investment activities. Firstly the proposed new parameters for chemicals in drinking water may result in the need for additional treatment at some plants or a revised treatment strategy at new plants which in turn will result in the need for additional capital. Secondly Irish Water operations will need to alter its current monitoring programme for drinking water to include enhanced testing for new parameters which will need further allocation of operational funding and thirdly additional staff will be needed to carry out enhanced monitoring plans and to operate more complex water treatment plants.