



National Federation of Group Water Schemes

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National Federation of Group Water Schemes Presentation to Joint Committee on Housing, Planning and Local Government on EU Commission proposal for a re-cast of the Drinking Water Directive

21 March 2018, 5pm.

The NFGWS would like to thank the Committee for the opportunity to attend today's meeting and while the NFGWS welcomes the overall proposal, there are several areas likely to present a significant challenge for the private GWS sector. The following is a summary our initial observations:

Risk Assessment Approach to Monitoring

The requirement for a risk assessment approach from catchment to consumer outlined in Article 7 & 8, with particular emphasis on the source catchment, is the recognised method internationally for identifying risks that can potentially impact drinking water supplies. The NFGWS is committed to this approach as the first step in protecting drinking water supplies and has been advancing work in this area on all regulated private GWS in recent years¹. However, the completion of detailed assessments and the implementation of associated measures to overcome identified risks on every GWS, could pose a significant challenge in the short-term. Any timeframe for completion of assessments and the implementation of mitigating measures that might arise, needs to be closely considered from a practical perspective. The GWS sector does not have the power of enforcement to implement significant measures to mitigate risk at catchment level and relies heavily on the good will of the community and the enforcement powers of the Local Authority to overcome significant issues.

Monitoring Implications

The schedule of parameters to be monitored under the proposed directive sees the addition of several new parameters to the Annex list. The requirement to monitor water for new and emerging threats to water supplies is essential from a public health perspective. However, the scale and frequency of water quality monitoring proposed would see a significant increase from the current monitoring requirements. The proposal outlines significant increases in the compliance monitoring required (a minimum of 10 samples per annum for all small supplies <1000m³ per day, and to 52 samples per annum for supplies >1000m³) with no exception. In addition, all suppliers are required to monitor all parameters initially, even if there is exceptionally low risk of occurrence, until sufficient evidence is obtained to justify ruling them out. By their nature, GWSs are low cost, community owned, community ran, Co-operatives which would not have the capacity to carry out this increased

¹ Implementation of the NFGWS 'Hazard Analysis Critical Control Points' (HACCP) based Quality Assurance System and Source Catchment & Zone of Contribution Delineation and Mapping projects

level of expensive monitoring. From our initial research, all the proposed new parameters cannot be analysed in this country at present.

Changing from World Health Organisation (WHO) Parametric Values

It appears that some parametric values in Commission's proposal differ from those recommended by the WHO, which will be difficult for individuals on group water schemes to understand and accept the need for such a change. The WHO produces international norms on water quality and human health in the form of guidelines that are used as the basis for regulation and standard setting world-wide. The proposal to introduce lower parametric values for certain parameters may also have practical and financial implications on the level of treatment required for certain water supplies.

Practical Implications for the GWS sector

Under the proposed directive, the responsibility for carrying out monitoring is placed on the water provider. At present in Ireland, compliance monitoring for the private GWS sector is carried out by the water services authority, (the Local Authority for the GWS sector), with only operational monitoring carried out by GWSs themselves. Extensive guidance training for GWS will be required to fulfil this obligation. All monitoring results must also be published online which again provides a challenge for small schemes.

Article 10 relates to the assessment of domestic distribution systems and monitoring for lead and legionella. GWSs are presently not technically competent to complete such assessments. Access and property rights would need to be considered to fulfil this role as well as funding towards implementing issues identified.

The GWS sectors overall compliance with the drinking water regulations has improved in recent years demonstrating almost 96.1% microbiological compliance in 2016. With the proposed changes to parametric values and inclusion of new parameters, there will be a period of uncertainty in relation to future compliance levels until further analysis is completed.

Conclusion

These are just some initial observations and the NFGWS will continue to review the proposal over the coming weeks to establish all potential implications for the GWS sector. The NFGWS would welcome an extensive consultation process on this proposal prior to its implementation.