

Milo Purcell
Deputy Chief Inspector
Drinking Water Inspectorate
Area 7E, 9 Millbank
c/o Nobel House
17 Smith Square
London
SW1P 3JR

7 August 2018

Dear Milo

Metaldehyde – PR19

I am writing to raise with you concerns we have regarding the apparent lack of progress on the proposed introduction of restrictions for metaldehyde and the implications we believe that this has for our water resources management plan, our business plan and our existing undertakings.

As you are aware we currently have three undertakings relating to supply of water containing metaldehyde above the PCV to specified water supply zones, which I have summarised for ease of reference in the attached table.

Our work on our water resources management plan has identified the need for us to be able to supply water from water treatment works covered by the undertakings into geographical areas not currently covered by the undertakings. Our strategy in the mid-term is to be able to move water around our supply area as freely as possible. This is essential to maintaining and improving our future resilience.

We are planning two key investments during AMP7 that will allow us to achieve this. As you are already aware, we will be investing in a treatment plant at Sundon to allow us to import more treated water from Grafham WTW and distribute it more widely throughout our supply area. We are also including strategic transfer schemes that will allow us to move water from our treatment works on the River Thames further north and into new parts of our supply area. It is also possible that we will need to be able to supply water from Ardleigh WTW more widely within our East region; this depends on the outcome of an investigation and options appraisal of the failure of the River Brett to meet the required environmental objectives under the Water Framework Directive.

We are encouraged by, and supportive of, Defra's proposal to consult soon on a targeted metaldehyde ban that the Minister advised us of in a letter dated 26 January 2018. In reliance on this assurance regarding consultation on a targeted ban, we have not currently provided in our business plan for metaldehyde treatment at any of our water treatment works including the new treatment plant at Sundon. We believe this approach to be consistent with the advice and guidance that has been provided to us by the DWI including your letter to me dated 6 March 2018.

We are, however, becoming very concerned that Defra has not yet published a consultation on targeted restrictions of metaldehyde meaning we do not know at this stage the scope, form or timing of any restrictions. This uncertainty is problematic for us from the point of view of finalising our investment proposals for our business plan.

Our reading of DWI's guidance¹ is that DWI's view is we would be unable to extend the geographical area of supply of water containing metaldehyde in excess of 0.1 µg/l. We remain fully committed to catchment management and are proposing an increase in scale and scope in our business plan for

¹ DWI, Guidance Note: Long term planning for the quality of drinking water supplies, September 2017



AMP7. However, we are concerned that catchment management alone is unlikely to be effective at reducing metaldehyde sufficiently to meet the standard at all times. There is a risk that if restrictions are either not implemented or are ineffective, we would be unable to supply water from our new treatment plant at Sundon and our River Thames based works into new areas. This creates a risk that we invest £48m in new assets that we are unable to use. It would also leave us unable to make sustainability reductions that the Environment Agency is seeking while at the same time keeping our customers supplied with water.

We therefore wish to seek the DWI's view at this stage regarding its willingness to review our existing undertakings in relation to metaldehyde to extend the geographical area to which they relate. I would be grateful for an early response to my letter because your response will inform finalisation of our business plan submission to Ofwat on 3 September 2018.

Yours sincerely

Eddie Lintott
Water Quality Manager (Compliance & Regulation)

Summary of Affinity Water Undertakings

Date	Water Treatment Works	Parameters	Water supply zones	
12 June 2014	Ardleigh	Metaldehyde, clopyralid and total pesticides	Z073 Mixed Zone	Z074 Surface Zone
7 July 2014	Chertsey	Individual pesticide, including metaldehyde, and total pesticides	Z066 Woking	Z069 Pirbright/Send
	Egham		Z063 Southall Z064 Bagshot / Sunninghill Z065 Ashford	Z084 Feltham Z086 Staines
	Iver		Z047 Ickenham/Denham Z048 Northwood/Ruislip Z050 Barnet Z051 East Barnet Z054 Finchley Z055 Rayners Lane Z056 Harrow Z057 Colindale/Kingsbury	Z059 Uxbridge Z060 Yeading Z061 Greenford/Northolt Z062 Wembley Z085 West Drayton Z087 Ruislip Z089 Sudbury Z090 Hayes
	Walton		Z067 Weybridge/Woodham	Z068 Walton
30 May 2014	Grafham (Anglian Bulk Supply)	Metaldehyde and total pesticides	Z014 Codicote Z015 Knebworth/Tewin	Z029 Luton North Z030 Luton East
	Hanningfield, Langham and Layer (Essex & Suffolk Water Bulk Supply)	Metaldehyde and total pesticides	Z071 Pilgrims Hatch	
	Ashford Common and Kempton Park (Thames Water Bulk Supply)	Metaldehyde and total pesticides	Z058 Hampstead Garden Suburb	