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Dear members of the ECCLR Committee

I note that at the March 15th 2018 meeting of the Public Petitions Committee, Brian Whittle voiced concerns regarding Scottish Waters lack of public consultation or explanation for the change to Chloramination.

I share those concerns and also object to the extremely short time scale customers in Ayrshire were given on the change to Chloramination which was approximately two to three weeks.

Given the complex and contentious issues involved surely the committee cannot agree that this short notice is acceptable. It is not conducive to trust, public engagement or transparency.

I emailed Scottish Water with my concerns on the 20th March 2018. Receiving no reply I contacted Scottish Water customer services again on the 26th March. Here is the transcript of the email which includes my original questions and the answers given. Please note that Scottish Water do not feel that they are required to ‘consult with customers’.

[Beginning of email from Scottish Water]

Customer Engagement Centre <help@scottishwater.co.uk>

To: Karin Craig

26 Mar at 15:08

Dear Karin

We have contacted our public health team who have advised as below on your enquiries regarding chloramination.

- The lack of transparency and debate on the matter. Was there any public consultation and what information was forthcoming from Scottish Water? The process is recognised by the water industry and authorised by water quality regulators on behalf of the Government as an effective and safe process for supplying potable water and ensuring meeting drinking water standards, as such when changing from chlorine to chloramines, into supply, we are not required to consult with customers, but we are expected to communicate with customers that it is going to happen.
Scottish Water make the claim that chloramination is safe and has been used for some time both in the UK and globally. The fact that it has been used for some time does not make it safe. Asbestos was first used in 1858 and continued to be used worldwide until it was banned in 1977. Did the longevity of asbestos use make it safe? What studies have been carried out on the safety to human health, animals and the environment on the use of chloramination? Studies have been carried out by various bodies notably the World Health Organisation who endorse Chloramination as a safe and effective way to disinfect drinking water.

Chloramine does not dissipate from water easily. How does this effect cooked food? Chloraminated water is safe for bathing, drinking, cooking and all uses we have for water every day.

What filters do Scottish water recommend to remove Chloramine and any byproducts from the water? Sophisticated filtration systems involving activated carbon are commercially available but SW can’t advise/recommend on the use of any particular brand.

Will Scottish Water pay the bill for any private individual installing a suitable filter and for the ongoing maintenance? No

Why is it not standard practice for appropriate filters to be added at point of water supply to households and businesses? Chloramination is a safe and effective process for supplying potable water and ensuring meeting of drinking water standards, therefore filters would not be used as standard practice by SW. SW will continue to monitor water quality by taking samples as per our Regulatory obligations to ensure that the water meets these strict standards

If you require any further information please do not hesitate to contact us. [End]

As far as I know there are little or no studies carried out that look at the impact of chloramination on human health, animal welfare or environmental impact. Scottish Water make huge claims re safety on the basis of very little evidence. Therefore it is imperative that customers not only are engaged with but that time scales are appropriate to gaining an understanding of the process involved and any negative outcomes. I, along with others, are now scrambling to look at filtering systems that deal with chloramination and due to time restraints and costs have not been able to acquire these or have them fitted

Karen Craig
27 March 2018
Dear members of the ECCLR Committee

This is my second submission on the issue.

I phoned up Scottish Water customer service today, the 28th March 2018, to ask when exactly the water supply in Ayrshire was to be subject to chloramination. It was confirmed to me that the process had began at the Bradan Water Treatment Works which supply the Ayrshire areas on the 19th of March 2018. It would take a few days to filter through the system but nonetheless it was now in the water supply.

The postcards that began dropping through Ayrshire households from around the 7th March stated that the chloramination process would commenced around the 'end of the month'. I would argue that the 19th of March is evidently not 'the end of the month' - but a few days past the middle of the month.

Given that I, along with thousands of households in Ayrshire received our postcard notifications at the at the end of the first week in March. This amounts to a period of just under two weeks.

I would say that this should raise further concerns re transparency, honesty and lack of public engagement from Scottish Water. It has put householders and businesses at a disadvantage in terms of a honest and appropriate period of notification. The exact timescales regarding commencement of chloramination In Ayrshire seems to be deliberately vague, fudged and misleading.

Karen Craig

28 March 2018