

Water UK does not currently view that there is any justification for a complete nationwide ban of metaldehyde, recognising the significant issue that slugs pose to our agricultural industry and the importance of retaining several actives on the market, but recognises that there is absolute duty on water companies to provide affordable, wholesome drinking water which has the trust of the consumer.

Water UK considers that reducing the overall amount of slug pellets containing metaldehyde applied to land will be the most beneficial way of significantly reducing the risk of treated water metaldehyde exceedances.

The most cost-effective way of ensuring that non-metaldehyde slug-control techniques are used in high risk areas is via the use of a combination of widespread voluntary and more targeted regulatory mechanisms.

Water companies must continue to monitor metaldehyde concentrations across catchments, and will share these data. Water companies will use these data to identify when abstraction may need to be ceased (where this is possible), or when blending options will need to be instigated.

Water UK:

- supports the view of the Drinking Water Inspectorate that simply continuing with current programmes of work will not be sufficient to secure compliance with drinking water standards in the medium to long-term, and welcomes the support given to the water industry by the DWI on this issue.
- supports the research programmes which have been undertaken by UKWIR and others to understand and define high risk areas, and encourages its members to make full use of the outputs from these studies.
- acknowledge that it is highly likely that low concentrations of metaldehyde could continue to be detected in the environment for a variety of reasons, and acknowledge that water companies will need to keep their catchment risk assessments under constant review.
- shares the view of others that metaldehyde could become a potential barrier to water trading, and could hamper efforts to improve resilience across the industry. Water UK believes that the measures described above, if implemented, will maximise opportunities for resilience.
- absolutely shares the view of regulators that wide-scale investment in additional treatment processes at affected water treatment works is not a sustainable answer, and that the costs to customers and the environment (from a carbon perspective) are not acceptable.

Water UK therefore calls for:

Members to ensure that they are following common practice with regard to catchment management and control, and are learning from leading companies on the best approach to take as part of the PR19 process.

The MSG:

- to re-launch the “Get Pelletwise” Stewardship scheme to deliver more uptake in particular in high risk areas by building on past experience to further encourage behaviour change by advisors and end users to protect raw water from contamination.

- to demonstrate a measurable impact of the stewardship messages by end users in high risk areas
- to demonstrate a further reduction in overall metaldehyde usage by end users over time

Pellet manufacturers:

- to ensure pellets containing metaldehyde irrespective of manufacturing technique are of a high quality with respect to spreading accuracy and weather resistance in order to reduce the contamination risk to raw water

Water UK will work with and support the environmental and other key regulators to understand how best to ensure that regulatory mechanisms are put in place, but calls for these to be in place by the end of 2019 at the latest.

Water UK calls on the environmental and other key regulators including the CRD to innovate and look beyond Water Protection Zones as a regulatory mechanism to provide alternative regulatory approaches should WPZ be deemed unlikely to work.

Water UK calls upon Defra to lead these discussions, and to quickly consult with Ministers, water companies and wider stakeholders on the most appropriate regulatory mechanism.

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