



DRINKING WATER INSPECTORATE

Ground Floor, SW
Seacole Building
2 Marsham Street
London
SW1P 4DF

Enquiries: 0330 041 6501

Email: reg31.enquiries@defra.gov.uk

DWI Website: www.dwi.gov.uk

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To: Relevant Approval holders, Board Level and Day to Day contacts of Water and Sewerage Companies and Water Companies in England and Wales

To whom it may concern

Changes to requirements of the regulation 31 approval of products used off-line for the disinfection or cleaning of membrane systems.

Purpose

1. The purpose of this letter is to inform approval holders and water companies¹ of a change in the policy and practice to the requirement for regulation 31² approval of those products currently included in section A.5 of the List of Approved Products for use in the public water supply in the United Kingdom where they are used off-line.

Background and change to policy

2. Regulation 31 prohibits water companies from introducing or applying products and substances to water which is to be supplied for domestic purposes (generally regarded as drinking, washing cooking and food production). Companies may, however, introduce or apply such products where *inter alia* such application or introduction has been approved under regulation 31(4)(a) by the Secretary of State. Approved products, intended for disinfection or cleaning of membrane systems, are included in section A.5 of the List of Approved Products accessible on the Inspectorate's website.

¹ This term refers to water undertakers, water supply licensees and inset appointees

² Regulation 31 of The Water Supply (Water Quality) Regulations 2016 (England) (as amended) and regulation 31 of The Water Supply (Water Quality) Regulations 2018 (Wales) (the Regulations) and equivalent regulations in Scotland and Northern Ireland.

3. Some of these products are intended to be used whilst membrane system is off-line, with the product being flushed away before the supply is resumed. A precautionary approach has been taken to date to require suppliers/manufacturers to apply for regulation 31 approval.
4. Since these products are not intended to be introduced or applied to water intended to be supplied for domestic purposes they do not come within the scope of regulation 31. In future suppliers/manufacturers of such products intended to be used as described above will not be required to apply for approval under regulation 31 and any applications made will not be considered. The current listings in section A.5, where used off-line, will be issued with a six-month notice of revocation. At the end of the revocation period, a letter of revocation will be issued and the products removed from the List of Approved Products. Applicants for any product currently subject to renewal of approval will not have the renewal completed and any new applicant will be contacted individually about their applications, with the application being closed.
5. This revocation does not affect the use of the product in the off-line cleaning or disinfection of membrane systems, nor does this revocation indicate any issues about the product content or formulation. The products affected by this change in requirements are listed in the table below.

DWI ref number	Company	Product name
56/4/737	Kurita UK Ltd	RoClean P111
56/4/855	Kurita UK Ltd	RoClean L403
56/4/964	Kurita UK Ltd	RoCide DB20
56/4/1007	Suez Water Technologies & Solutions	Kleen* MCT524
56/4/1319	H2O Innovation UK Limited	Genesol 704
56/4/1333	Brenntag UK & Ireland	Citric Acid 50% Solution
56/4/1506	Veolia Water Technologies & Solutions (Belgium)	Kleen MCT105
56/4/1509	Veolia Water Technologies & Solutions (Belgium)	Kleen MCT405
56/4/1544	Kurita UK Ltd	RoClean P303

Action by approval holders affected by this change in policy

6. The Regulation 31 Team will be reviewing all approvals listed in section A.5 of the List of Approved Products. Those products that are used off-line will receive a six-month notice of revocation. Once the revocation period has been reached a revocation letter will be issued and the product will be removed from the List of Approved Products.
7. This revocation is being issued based upon the off-line use of the product and in no way implies the products cannot continue to be used off-line as designed.
8. Products that are designed for continual use will remain approved.

Action by water companies

9. Water companies should note the change in policy and practice as described above. Water companies are reminded that they should be following the requirements and recommendations of the membrane system approval holder as prescribed in the instruction for use (IFU) document approved for that product. Additionally, a membrane supplier may recommend certain chemicals for the off-line disinfection or cleaning of a membrane system.
10. The revocation described in this letter does not apply to products that are continually used in association with approved membrane systems.
11. Companies should note this change **only** applies to those products included in section A.5 of the List of Approved Products and where they are used off-line.

Enquiries

Any enquiries regarding this letter should be made to the Regulation 31 Team by email to reg31.enquiries@defra.gov.uk.

Copies of this letter are being sent to: David Henderson, Chief Executive, Water UK; Martin Woolhead, Deputy Director Water Sector Delivery, Department for Environment, Food and Rural Affairs; Martin Williams, Water Management Team, Welsh Government; David Reynolds, Drinking Water Quality Regulator for Scotland; Berni Corr, Drinking Water Inspectorate for Northern Ireland; Karen Gibbs, Mike Keil and Catherine Jones, CCW; David Beesley, Ofwat; Nadeem Raja, Food Standards Agency; Stephen Robjohns, UK Health Security Agency; Stewart Mounsey and Richard Thompson, Environment Agency.

This letter is being sent electronically to approval holders in section A.5 of the List of Approved Products, board level and day to day contacts. Please acknowledge receipt by email to dw.enquiries@defra.gov.uk. Hard copies are not being sent but the letter may be freely copied.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Brenda Caymen', with a long horizontal stroke extending to the right.

Brenda Caymen
Principal Inspector, Regulation 31 Team