REFERENCE

2425294

RELEASE DATE

September 2024

SUBJECT

Water Treatment Chemicals & Costs for WTWs at Lough Neagh.

Levels of PFAs recorded at Lough Neagh

REQUESTS & RESPONSES

1. *A full list and quantities of all chemical substances used at water treatment works and other water processing facilities at Lough Neagh.*

   The full list of chemicals used at Water Treatment Works and other water processing facilities at Lough Neagh is as follows:

   - Aluminium Sulphate
   - Sulphuric Acid
   - Calcium Hydroxide
   - Liquid Oxygen
   - Orthophosphoric Acid
   - Ferric Chloride
   - Chlorine (gas)
   - Sodium Hypochlorite
   - Sodium Bisulphate
   - Sodium Hydroxide
   - Polyelectrolyte
   - Powder Activated Carbon

   The quantities of chemicals used at specific treatment points is however considered lawfully exempt from disclosure under both Regulation 12(5)(a) and Regulation 12(5)(e) of the EIRs.

   Regulation 12(5)(a) – national security and public safety

   Regulation 12(5)(a) of the EIR states that: “a public authority may refuse to disclose information to the extent that its disclosure would

adversely affect international relations, defence, national security or public safety."

This exception is subject to the consideration of the public interest. The Information Commissioner's Office considers that information requested should be released unless the public interest weighs in favour of withholding such information.

The public interest in releasing the information requested is that it clarifies demonstrates NI Water's willingness to be open and transparent in its processes.

Against this, detailed information about water treatment processes associated with specific works (to include chemical dosage within each plant) are considered highly sensitive as they relate to the supply of potable water.

There is a very real, not merely hypothetical, risk that the release of the requested details to the wider public could be useful for subversive activity to those with malicious intent. Accordingly, NI Water, acting as a prudent water undertaker, cannot responsibly place this information within the public domain via the EIR. Protection of its citizens is the first duty of a government and, therefore, the release of any information that might make that task more difficult would not be in the public interest. Even if the risk of this happening were not considered very high, the consequences of such an event, if it did occur, would be so grave that NI Water is in no doubt that the balance of the public interest in this case falls clearly in favour of maintaining the exception rather than disclosing the information. For the reasons detailed above, and in accordance with existing guidance pertaining to security considerations and public safety as it pertains to water and sewerage services infrastructure, NI Water has concluded that the public interest favours withholding further information about the quantities of chemicals added to specific

supplies.

Regulation 12(5)(e) - Confidentiality of commercial or industrial information

This exception is also subject to the consideration of the public interest. The public interest in releasing the information requested is that it clarifies demonstrates NI Water's willingness to comply with information access requirements. Against this, NI Water has balanced the interest in protecting commercial information particularly where the disclosure of the information might undermine NI Water's ability to operate commercially in the future. Under the legislation, disclosure to an individual is considered disclosure to the public at large and there is a very real risk the information sought would, if released to the wider public domain, have a detrimental impact on NI Water's commercial revenue or weaken the Company's position in a competitive environment by revealing market sensitive information. Providing a breakdown of the individual chemical cost and associated quantities per site will highlight a commercial issue by enabling calculation of the current supply cost per chemical. As such, NI Water considers the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

2. *The annual costs associated with each water processing facility at Lough Neagh during 2019, 2020, 2021, 2022, 2023 and 2024 up to the latest point possible.*

   Total chemical costs per annum used at Water Treatment Works and other water processing facilities at Lough Neagh is as follows:

   2019/20 - £3,715,421

   2020/21 - £3,831,318

   2021/22 - £4,167,669

   2022/23 - £6,915,140

   2023/24 - £6,823,93

3. *Levels of PFAS recorded at Lough Neagh testing points (please identify which testing points these are) during 2019, 2020, 2021, 2022, 2023 and 2024 up to the most recent possible point.*

   Surface Waters and Rivers

   The Northern Ireland Environment Agency (NIEA) are responsible for the monitoring of water quality in surface waters and rivers within Northern Ireland, so this question should be referred to that organisation please.

   https://www.daera-ni.gov.uk/contacts/northern-ireland-environment-agency-contact

   Northern Ireland Environment Agency,
   17 Antrim Road, Tonagh,
   Lisburn, County Antrim. BT28 3AL
   Email: nieainfo@daera-ni.gov.uk
   Telephone: 0300 200 7856

   Quality of the raw water that we abstract into the WTWs which use Lough Neagh as the raw water source

   NI Water have undertaken monitoring for PFAS compounds in the raw water since 2020. Annex A attached provides results of PFAS from samples taken in 2020 to 2024 (year to date).

4. *Levels of PFAS recorded at testing points (please identify which testing points these are) during 2019, 2020, 2021, 2022, 2023 and 2024 up to the most recent possible point for the following rivers: (i) Lower Bann (ii) Upper Bann (iii) Blackwater estuary (iv) Sixemilewater estuary (v) Glenavy River (vi) Crumlin River (vii) Moyola River (viii) Ballinderry River (ix) River Main*

   As per Answer 1 above, this element should again be directed to the NIEA.