



National
Measurement
Office



The Government Chemist

Queens Road
Teddington
Middlesex
TW11 0LY
UK

Department for Environment, Food and Rural Affairs
waterforum@defra.gsi.gov.uk

27 May 2014

Enquiries: +44 (0)20 8943 7403
Direct line: +44 (0)20 8943 7365
www.governmentchemist.org.uk

DEFRA/Welsh Government Open Consultation

Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment

Response from the Government Chemist

As UK Government Chemist, I am responsible under certain Acts of Parliament¹ for providing independent analytical measurement and expert opinion to help avoid or resolve the disputes over scientific data which arise from time to time between local authorities and the businesses that they regulate. My public remit also covers wider advice to UK government and other affected parties on the role of analytical measurement in effective policy, standards and regulations. My staff liaise with regulatory services involved in sampling, analysis and product testing linked to the investigation of alleged non-compliances. I am pleased to be able to respond to this consultation particularly as many of the aspects covered appear frequently as the subject of referee casework². I have looked at the consultation and can respond to those questions where there is an analytical measurement dimension.

I have looked at the changes proposed for the designated pollutants under the Water Framework Directive, in the context of robust and reliable chemical measurements needed for enforcement and monitoring purposes.

Overall, I support the move to tighten and revise quality standards for specific pollutants in water bodies to reflect both changes in EU regulation as well as the changing specific needs of the UK.

Where new standards or revised standards are proposed, I would advise that appropriate validated methods of analysis are routinely available in monitoring laboratories for which the limits of quantification (LOQs) are below the values proposed. Good examples of this are triclosan, where many published methods for its determination in waters quote LOQ values at or just below the proposed level in the standard of 0.1 µg/L, and chlorothanilil, where many recently-published papers quote limits of detection around 0.05µg/L, which is above the 0.035 µg/L figure in the proposed standard.

Thank you for this opportunity to comment.

Yours sincerely

Derek Craston
The Government Chemist

¹ Boley, N. Government Chemist Legislation, Annual Statement of Statutory Scope, January 2014, available at <http://www.governmentchemist.org.uk/News.aspx?m=2&amid=1790>

² Michael J Walker and Kirstin Gray, 2013, *Quis custodiet* – a Review of the Resolution of Disputed Chemical Results in the UK Official Feed and Food Control System 2010 – 2011, *J Assoc Public Analysts* (Online) 2013, 41, 1-27