

Jersey Water commentary on Environment, Housing and Infrastructure Scrutiny Panel Hearing on PFAS – 20 March 2026

Jersey Water fully supports the introduction of a clear, evidence-based PFAS standard for the Island. Our current water supply remains safe, and the proposed limit is a forward-looking measure designed to strengthen long-term protection.

We are committed to meeting a new standard and to playing our full part in delivering an effective and affordable solution for Islanders. Given the scale, cost and national importance of this project, it is essential that States Members have a complete understanding of the scientific, financial and operational implications before the new standard is approved and that they are fully informed of:

- The completed work of both the Independent PFAS Scientific Advisory Panel and Steering Group work, alongside stakeholder engagement - to provide clear, complete and reliable evidence, reduce assumptions in treatment design and inform consultation on the proposed regulatory changes.
- Clarity on funding and alignment with the standard – to ensure capital and revenue costs are fully understood and supported by a clear funding mechanism.
- A clear assessment of customer bill impacts – to ensure the solution is affordable for Islanders.
- A delivery timeline that reflects the work required – to allow sufficient time for effective implementation while reducing PFAS as soon as reasonably practicable.
- The wider impact on water resources and resilience – to ensure PFAS treatment decisions support, rather than constrain, the Island's long-term water security amid competing investment pressures.

Jersey Water remains committed to working collaboratively with the Government, Scrutiny and the wider States Assembly. We will continue to provide access to our technical work, costings and advisers to support transparent decision-making and help shape a long-term PFAS and water-management strategy that delivers reliable, sustainable and cost-effective outcomes for the Island.

	Extract from Transcript	Jersey Water Comment
1.	Page 6 – Minister for the Environment – “I think we can see through the way the other recommendations come out that there is a lot more work for Government to do.” “Whereas a lot of the other recommendations will result in officers doing work on what we might and might not do, which paths we might take or might not take.” “There is a lot of guidance about levels of P.F.A.S. in land and soil and how we might treat contaminated material, whether that is fields or what have you. There is a lot more sampling of food to be done, particularly potatoes. There is a lot more analysis of other foods that are grown. There is lots more work to do.”	The Minister’s comments highlight a wide range of follow-on work for the Government across sampling, guidance and wider PFAS management. Jersey Water has not yet seen an overarching, integrated delivery plan setting out priorities, responsibilities, timelines and how the different workstreams (water, land/soil, food, health, pollution remediation, regulation and waste) will be coordinated. Given the interdependencies, particularly where decisions on land, waste and remediation affect drinking-water risk and treatment requirements, Jersey Water considers an Island-wide holistic PFAS Management Strategy is needed. This should bring together objectives, governance, resourcing, reporting and decision points so that actions are coordinated and transparent, and so that measures affecting water quality and customer costs can be planned and assessed properly.
2.	Page 7 – Group Director regulation – “the Panel’s report is not open to consultation.” “What they are seeking are points of clarification, things that they miss, things that are not well understood because it might be too technical.”	It is helpful to distinguish between a formal consultation and opportunities for stakeholders and Islanders to provide input. There has been no formal public consultation on the Scientific Panel’s report or on the proposed drinking water standard that is now being progressed. Given the scale of the decision, and the potential implications for delivery, cost and bills, Jersey Water considers there should be a clear and transparent process for receiving and addressing stakeholder input. PFAS science, health guidance and regulatory approaches continue to develop internationally. A structured engagement process would help to test

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		assumptions, identify practical delivery issues early and improve confidence in the final approach.
3.	Page 13 – Biosolids – “We will certainly look at those and issue guidance, but the general message is everything is really okay and it is only in certain circumstances that you would seem to maybe have a think about it or change tactics. Where we put biosolids back to land there is very few tests which are showing elevated levels. So at the moment I think the message on biosolids is okay.”	Biosolids management is directly relevant to water treatment operations, I&E wastewater management and the protection of water resources. Jersey Water notes the Panel’s recommendation that land spreading can continue while soil PFAS loading remains below a defined level. If this approach is taken forward, it will need clear regulation and guidance, including what testing is required, who is responsible for testing, how results are recorded, and what action is required if levels increase over time. Without clear, enforceable rules, landowners may be reluctant to accept biosolids due to uncertainty about future liability and cumulative impacts. That would create operational and cost pressures for water and wastewater treatment and biosolid disposal and could increase wider environmental risk. Jersey Water supports proportionate controls based on evidence and ongoing monitoring, so that biosolids can be managed safely and consistently across the Island.
4.	Page 14 – Question regarding Biosolids PFAS concentrations from Bellozanne “So we asked where does it go before ... they now do not receive it, and they were unable at that time to answer.”	The evidence given appears not to confirm where this flow is now going, and whether it is being treated, stored, tankered off Island, discharged to the environment or disposed of by another route. Jersey Water considers this information should be set out clearly, because changes in disposal routes can affect environmental risk, regulatory oversight and the management of PFAS pathways into surface water, groundwater and land.
5.	Page 19 – Minister for the Environment - “There is a targeted amount [of PFAS] that you can tolerate on a weekly basis.	Jersey Water understands the Scientific Panel’s position is that overall PFAS intake, when considering both food and drinking water, is below the European

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	They have done the calculation, given the amount of food that we eat and the type of food. They have analysed this and everything else and they are very clear the level in water should be 4.”	Food Safety Authority’s recommended tolerable weekly intake, and that the proposed 4 ng/l limit is intended as a precautionary, future proofing standard. Jersey Water supports setting protective standards. However, if the primary purpose of the 4 ng/l limit is precautionary, Jersey Water considers the implementation timetable should be based on what is realistically deliverable, including confirming the required treatment solution, securing funding and completing the necessary design, planning, procurement and construction work. A timetable that does not reflect these steps risks higher cost and poorer outcomes.
6.	Page 22 - Minister for the Environment - “Certainly, all the way through last year we were very consistent about where we were going, and apart from mentioning that the timeline might be challenging - that obviously depended on where we went and what we did”	Jersey Water was not formally notified in advance that a proposition to introduce a statutory PFAS drinking water limit would be lodged before the Scientific Panel’s work was completed. Jersey Water understood that the Panel’s published timetable would extend beyond the election. Jersey Water was not aware that draft legislation was in development or that it was to be lodged, until less than 24 hours before. Jersey Water considers that proposals of this scale should be developed with effective early engagement with the public water supplier, including clear consideration of feasibility, treatment options, programme risk, capital and operating costs, funding route and impacts on customer bills. Jersey Water has requested clarity, verbally and in writing, on how the stages to achieve that would be governed and coordinated in anticipation of a future legal limit.
7.	Page 21 – Minister for the Environment – “... they are looking for treatment works costing anything up to £220 million. That is a multiple or multiples more	The Minister and his officers were briefed on the progress of Jersey Water’s feasibility work on 17 July and 11 August 2025. In both briefings we outlined the limitations of retrofitting the existing works, the likely need for a new facility to meet the 4ng/l standard and the associated cost estimate. Extracts from those

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	expensive than any indication I have had previously from them. Up until now we have spoken about G.A.C., we have spoken about ion exchange at the two existing treatment works ...” “... granular activated carbon and ion exchange being two processes which could work together and putting those facilities into both their existing treatment works at £10 million a go, so potentially £20 million on each site. That is where we were as far as I was concerned. I have had no information.”	briefings have been submitted to the Scrutiny Chair separately with the relevant sections highlighted. Officers have also been kept updated through the PFAS Hydrogeological Steering Group, where the same themes have been discussed. Our consultation feedback to the Scientific Panel and our letter in September to the Minister also set out our concerns with the prospect of retrofitting and the likely need for a new facility. Concerns regarding retrofitting of GAC and Ion Exchange have been raised by Jersey Water consistently throughout the Scientific Panel process (including in our only formal evidence session in March 2025) and with the Minister and officers. We have been trying to meet with the Minister and his officers since the proposition was lodged but have so far been unsuccessful in securing a meeting.
8.	Page 24 - Group Director regulation - “World Health Organisation guidelines for drinking water quality says that member states should strive to achieve concentrations in drinking water that is as low as reasonably practicable. So that is also what the P.F.A.S. Panel have acknowledged and recommended in their report.”	Jersey Water agrees with the WHO principle that drinking water concentrations should be reduced as low as reasonably practicable. In practice, this means reducing risk as far as can reasonably be achieved, taking account of what is technically feasible, the time needed to deliver it and the cost to customers. Jersey Water has already applied this approach across our operations by taking higher PFAS sources out of supply, even where they remain legally usable, for example the St Ouen boreholes and Pont Marquet stream source. The key question is what is considered “reasonably practicable” in Jersey, based on current evidence on treatment feasibility and the full cost of delivery. Jersey Water’s work to date indicates that achieving 4 ng/l may require a materially larger solution than simple additions to existing works, with significantly higher costs than previously assumed by the Scientific Panel.

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		Jersey Water therefore considers this assessment should be made openly, using the latest evidence, before a legal limit and an implementation timetable are set.
9.	Page 23 – Minister for Environment – World Health Organisation commentary	The WHO guidelines are aimed at all countries around the world and by their nature need to take account of developing countries. The philosophy aligns with reducing PFAS levels as low as is reasonably practical. That does not mean that the WHO will impose a limit that is unsafe. On the contrary, the process will seek to ensure that there is a robust standard for all countries to work toward that becomes a baseline standard. Any limit that goes beyond that baseline becomes a choice based on what is “reasonably practical” and most likely what it can afford and the public health benefits it brings. There is also the possibility that the WHO may come out with a greater list of substances of concern than the four selected by the Scientific Panel, or a different recommended limit. This could render obsolete any legislation based solely on the four with the risk of abortive spend. Rather than dismissing the development of international water quality standards for PFAS, we would see that process as an opportunity to course correct or validate the choices that have been made in Jersey. Seeking alignment with international standard frameworks would not mean a pause in the work required to achieve lower PFAS levels. It is simply a suggestion that we validate a very costly decision with corroborative evidence before locking it into regulation.
10.	Page 24 – Minister for Environment – “They are importing a lab at scale that will allow them to test water.”	Jersey Water will continue to use UK accredited laboratories for PFAS testing to ensure quality assurance and consistent, comparable results.

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		Jersey Water has no current plans to establish PFAS testing on Island, given the specialist equipment, skills, quality control requirements and cost involved.
11.	Page 24 – Minister for Environment – “Where we differ is on timeline. The Panel were very clear they spoke to a number of people, experts in this field, people who had installed these processes on other plants around Europe and outside of Europe. A number of people said they had managed it in less than three years. The Panel were very receptive to the argument from Jersey Water that the physical challenges of both Handois, Augrès less so but particularly Handois, would make it difficult. The Panel allowed them another two years to allow for the practical challenges of maybe having to have specialist bits of equipment built and installed.” “There is no intention here to set a timeline which is unachievable with a goal of getting at the end of it and coming down heavily on Jersey Water because they have not achieved it.”	Jersey Water has consistently stated that the five-year timeline was challenging, especially in the Jersey context. Particularly when the need is not for a bolt on treatment process but for a whole new treatment facility. It is clear that the Panel and the Minister have been working on the outdated assumption that a retrofit solution was feasible, when in fact we have communicated that this is not the case. The draft report by the Panel does not currently consider the feedback we have provided on the proposed timelines. It would be interesting to determine whether the three years referenced by the Minister and Panel is construction time only (which would appear reasonable) or whether it has factored in pilot trials, whole life costing exercises, funding, land acquisition, planning consent (including a “public enquiry” as mentioned by the Minister in the scrutiny hearing). It is important when making comparisons that we are measuring like for like. It should be noted that aside from the one formal presentation we gave to the Panel in March 2025 (when our feasibility work was at an early stage and the recommended limit had not been determined), there have been no requests from the Minister, his team or the Panel for our views on the work required or the time it would take. It should also be noted that neither the Panel nor the Environment team have made detailed assessment of the feasibility of fitting treatment processes to our works or reviewed any of the work we have done on the need for a new treatment facility.

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		It is recommended that the determination of the time required for compliance should be based on evidenced consideration in a local context.
12.	Page 25 – Minister for the Environment Dispensations -	Jersey Water recognises that dispensations can be an important regulatory tool in limited, clearly defined circumstances. However, dispensations should not be relied on as the planned way to manage an implementation date that is not realistically deliverable. Using dispensations in this way would risk undermining confidence in the regulatory framework and in the public water supply, because it would create a foreseeable position where Jersey Water is unable to meet a legal standard by the set date and must then seek regulatory relief. Jersey Water has previous experience of the long-lasting reputational effects that can follow from dispensation-based compliance arrangements, for example in relation to nitrates and pesticides, even where water quality has been fully compliant. Jersey Water therefore considers the priority should be to set an implementation timetable that is achievable and evidence-based, reflecting the work required to identify, fund, consent, procure, build and commission the necessary solution. Dispensations should remain a last resort and be supported by clear criteria and transparency.
13.	Page 28 – Group Director – Regulation: “Just to come back to the question in terms of within the Water Law, there is a requirement for Jersey Water to provide an annual report. They do that, they do that regularly. In fact they have voluntarily for a number of years now	Jersey Water publishes an annual water quality report as a matter of transparency and good practice. This is not a requirement of the Water (Jersey) Law 1972. Jersey Water has included PFAS monitoring results in its reporting for a number of years, ahead of any specific legal requirement to do so. This is intended to provide clear, accessible information for our customers.

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	reported on the 48 P.F.A.S. compounds even without the requirement in the law. I think that is a really positive step from the water company recognising the importance of the issue, that they already provide that information. That is all in the public domain as well on their website.”	The Water (Jersey) Law does require Jersey Water to produce annual accounts, which are published and presented to the States Assembly.
14.	Page 28 - Group Director – Regulation: “I believe it is Article 30 that has the Minister may instruct the company to carry out surveys and make reports in terms of the water.”	Article 30 of the Water (Jersey) Law relates to surveys and reports on water resources, demand and consumption. It does not provide a power to require reports about drinking water quality.
15.	Page 30 – Minister for Environment – “I am not going to go back on what I said earlier about the change of direction, but I do not believe that the bringing of the proposition has any really serious analysis. There is a massive difference between £220 million, £130 million, all these numbers getting bandied about. I am not sure or aware that we had done any serious analysis on any of that. In any case, as far as I am concerned, while a brand new treatment works has been mentioned, nothing that I have seen from Jersey Water up until I lodged my proposition indicated there was any	Jersey Water’s position has been consistent. Since March 2025, Jersey Water has provided the Minister, officers and the Scientific Panel with updates on treatment feasibility, the constraints of the existing works and the potential scale and cost of options to meet a 4ng/l standard. This included briefings to the Minister in July and August 2025, and follow up correspondence, before the proposition was lodged. Jersey Water therefore does not recognise the suggestion that the “low tens of millions” retrofit approach remained the agreed position at the point the proposition was lodged.

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	problem with the two treatment works that we are using at the moment. There is some refurbishment work to be done, I accept that. But the indications have always been, right until I lodged my proposition, that they could cope with granular activated carbon and ion exchange at their two current treatment works. For redundancy purposes they need to do both and that the levels were in the low tens of millions of pounds.	
16.	Page 30 - Deputy H.L. Jeune: “... Was that indication of those technology to get to the 4? Just to link that up, that technology that were being put that Jersey Water were doing to reduce the P.F.A.S. level, did they communicate to you that that technology would be able to help them get to the 4? The Minister for the Environment: “Yes..... But Jersey Water have indicated in the past granular activated carbon and ion exchange were their preferred methods of getting to 4 nanograms, given of course that the work is to be ...”	The Scientific Panel’s recommended standard of 4 ng/l was issued in July 2025. Before that recommendation was known, Jersey Water’s feasibility work and early costing considered a range of possible outcomes and treatment levels. The concept work that indicated costs of around £20m per site was produced before the 4 ng/l recommendation and was not costed on the basis of achieving 4 ng/l. Jersey Water agrees that granular activated carbon and ion exchange are established technologies for reducing PFAS in drinking water and may form part of the solution to meet 4 ng/l. The key issue is not whether the technologies exist, but whether they can be delivered at Handois and Augrès through retrofit works within the space, access and operational constraints of those sites, and at what whole life cost. Jersey Water’s feasibility work to date indicates that achieving 4 ng/l is unlikely to be deliverable through retrofit installation at the existing works, and that a materially larger solution, including new infrastructure, will be required.

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17.	Page 32 - Group Director, Regulation: Yes, exactly, that is right. The two proven technologies worldwide at scale, for example, Sweden put very inaccessible places across their whole network in a very short period of time. The two proven technologies is granular activated carbon and ion exchange. They work for particularly constrained sites, as we understand it, and that is the evidence that the Panel have presented.	General examples from other jurisdictions do not, on their own, demonstrate deliverability in Jersey where the specific circumstances need to be taken into account.
18.	Page 32 - Minister for Environment - “I have not had a specific conversation with them around that. But what I would reiterate is up until the time I had lodged my proposition I was under the impression - and I had seen nothing to the adverse effect, other than Jersey Water starting to indicate towards the end of last year - that maybe 5 years might be a time challenge. But I dealt with that absolutely by saying there is derogations and that is what they are there for. The £230 million new plant is clearly a complete replacement of both Handois and Augrès; that has never been indicated to me that that was necessary. I am not saying a discussion	Since the Proposition was lodged, Jersey Water has requested meetings with the Minister and officers, to address the apparent misunderstanding and ensure there is a shared view of the feasibility findings, options, costs and realistic delivery timescales. To date, a meeting has not taken place. Jersey Water notes the Minister’s evidence refers to an “impression” about deliverability at the existing works. Jersey Water considers decisions of this scale should be based on a clear evidential record, including the latest feasibility work, costings and site constraints at Handois and Augrès. Jersey Water also notes references to derogations or dispensations. As set out above, Jersey Water considers that these should not be relied on as the planned way to manage an implementation date that is not realistically deliverable. Jersey Water therefore suggests a formal, transparent process to receive and address stakeholder input, and to confirm a single agreed statement of the technical position before States Members are asked to take further decisions that have major cost and customer bill implications.

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	was not had about the possibility at some point we might have to have a completely new treatment works, right, but when it came to the treatment of P.F.A.S. we have always been under the impression working with Jersey Water that granular activated carbon and ion exchange, while it would be a challenge physically, especially in the valley below Handois - and there might be ways of getting over that, I do not know - we were moving forward on that basis.”	
19.	Page 34 - The Minister for the Environment: The other one thing that will not change is that we will still have a hotspot of P.F.A.S. at the airport. Regardless of who the Minister is after the summer, the hotspot will still have P.F.A.S. there and it will still be leaving the site. That remediation work will have to happen because, as a regulator, regardless of who it is, there is an obligation there. The pollution has been identified; we know where it is. Work has to be done. Remediation has to take place. Ports of Jersey are doing that work and coming up this year. But regardless of who it is	Jersey Water agrees that remediation of the airport PFAS sources should continue and be progressed as a priority, in line with regulatory obligations. Historic PFAS pollution has already led to significant water resources being taken out of use, which affects water system resilience and can increase the cost of supplying customers. Jersey Water therefore supports clear governance and reporting for the remediation programme, including milestones, monitoring results and how risk reduction will be demonstrated over time, so that the Island can restore affected water resources as soon as practicable.

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	and what they think, the remediation of the airport will have to continue because it is a legal obligation.	
20.	Page 36 - The Minister for the Environment - “Notwithstanding what is happening at the moment, and we mentioned the airport, but we have a steering group, Government regulatory department, Ports of Jersey, Jersey Water, I thank them all for their work. We have some arguments over this but let us look at that. Jersey Water have worked fantastically well with us and with Ports in addressing in a collegiate way how we are going to tackle this problem. It is in everybody’s interest. Ports want it resolved; Jersey Water want it resolved. They want to be able to carry on pumping water out of Pont Marquet or down in St. Ouen for that matter sometime in the future. It is in everybody’s interest to work together and people have worked together really well on this problem and in 2 years we have achieved a lot, there is no doubt in my mind.”	Jersey Water remains committed to working constructively with the Government, Ports of Jersey and other stakeholders to reduce PFAS risks and to restore impacted water resources where possible. Jersey Water agrees that progress has been made through the steering group approach. Jersey Water considers the next stage now needs clearer governance, including agreed roles, a shared evidence base, and a shared communications position on feasibility, cost and delivery timescales. Jersey Water’s ambition would be that any future legislation and implementation plan are developed with early engagement and full transparency on customer impacts, so that States Members can make decisions based on the best available evidence and Jersey Water can deliver the required outcomes efficiently.