

Summary of submissions: Proposed changes to Drinking Water Quality Assurance Rules for supplies that serve 500 or fewer people

The Water Services Authority – Taumata Arowai (the Authority) is reviewing the Drinking Water Quality Assurance Rules (**the Rules**) in two stages: for supplies that serve 500 or fewer people in 2024 and for supplies that serve 500 or more people in 2025.

On 23 September 2024, we began a five-week public consultation on proposed changes to the Rules for supplies that serve 500 or fewer people. We received 145 submissions on these proposed changes.

The following three tables and explanatory notes present information about the submitters of this first consultation.

Table 1: Of the 145 submissions received, 119 were on behalf of an organisation or group and 26 were submitted by individuals.

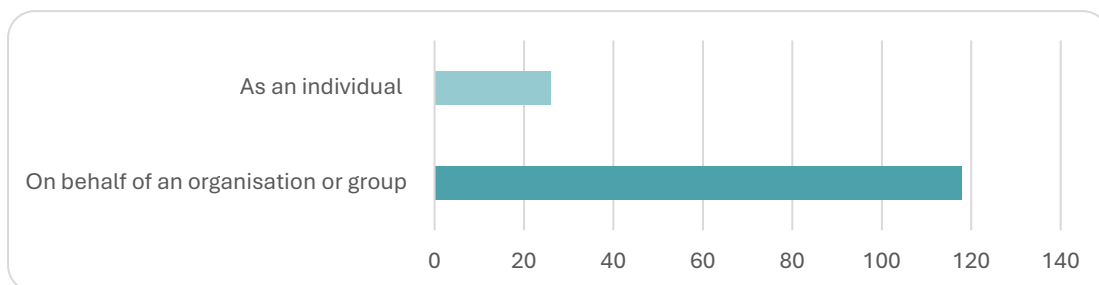


Table 2: Of the 145 submissions received, 18 were identified as a national response. We received responses from 16 regions.

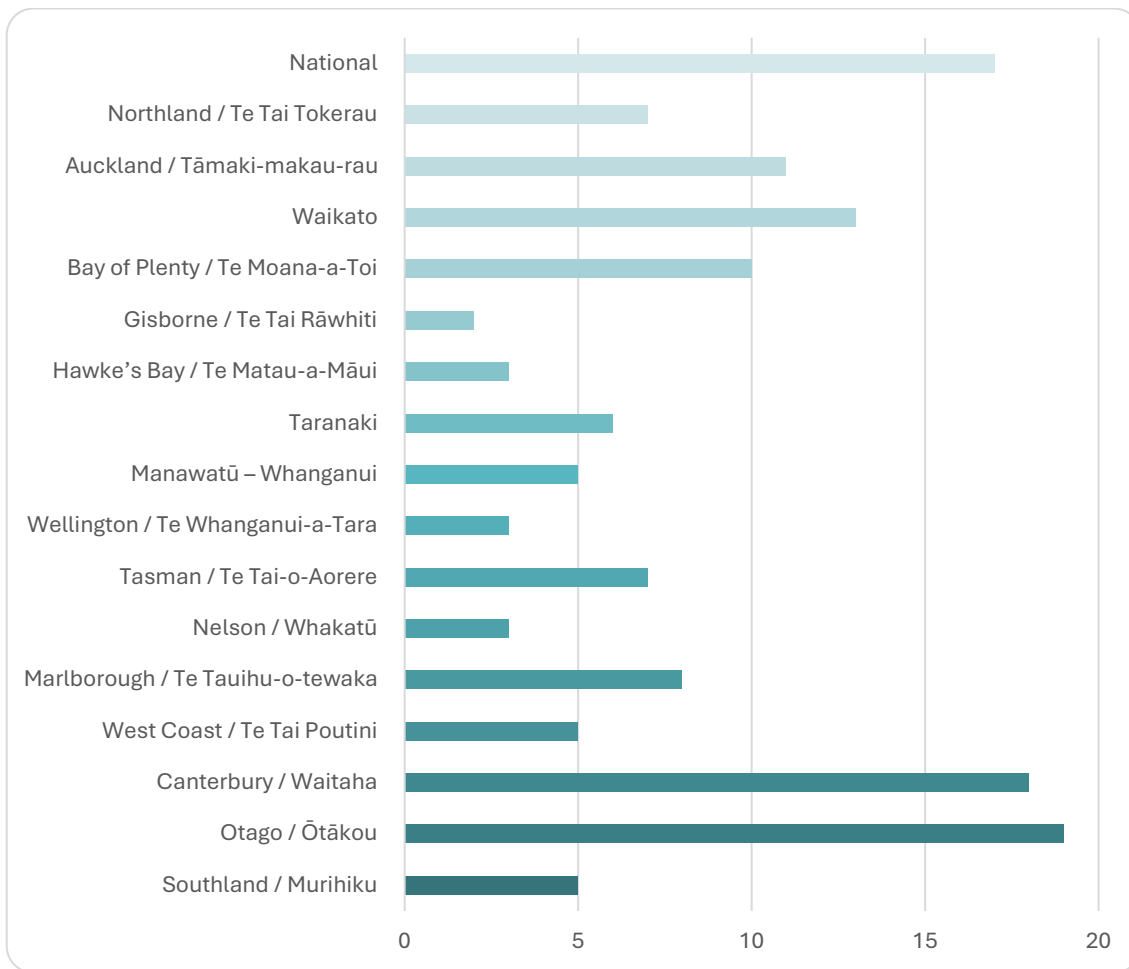
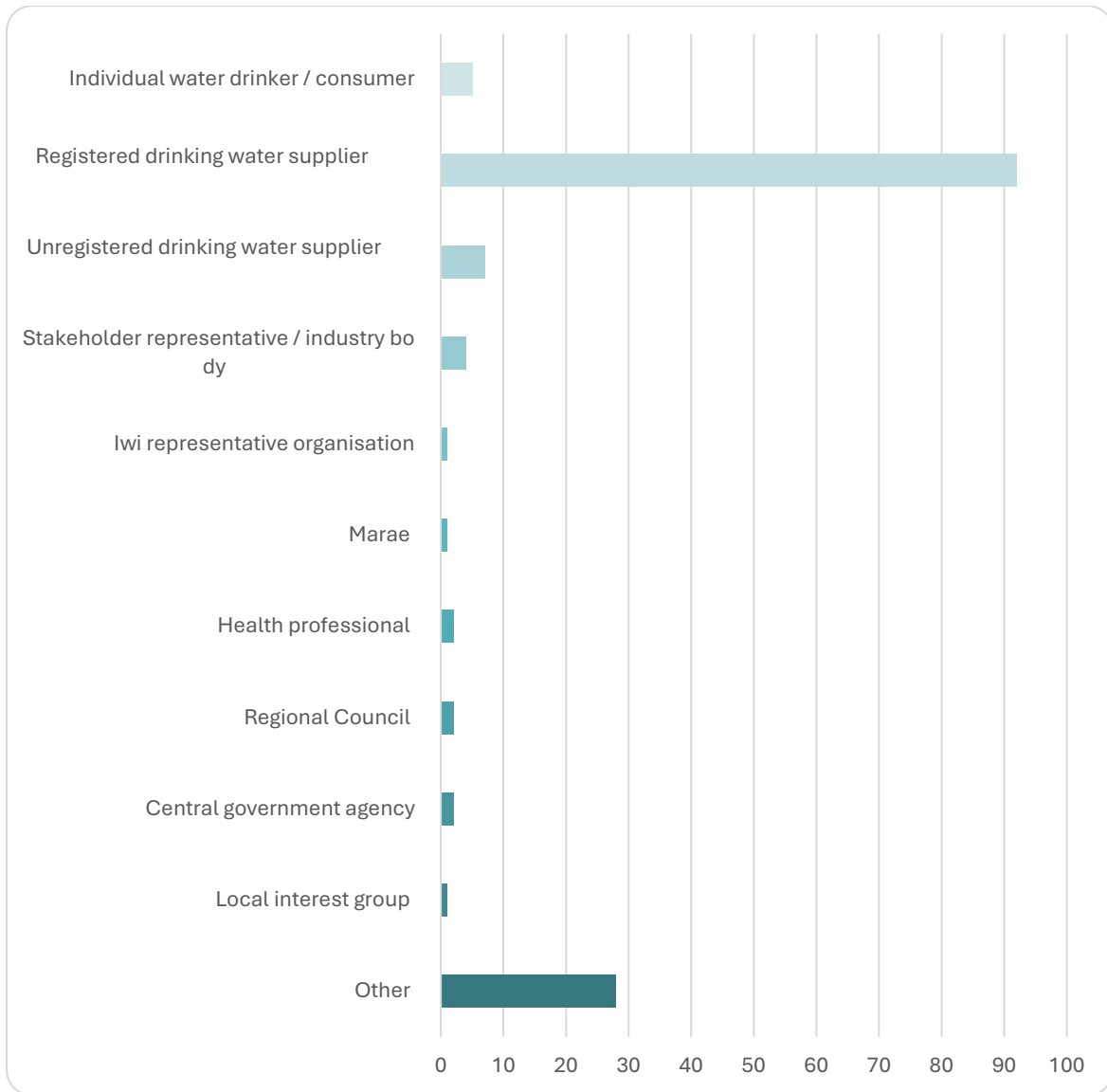


Table 3: Most responses were from submitters who identified themselves as a registered drinking water supplier (excluding marae) (92), ‘other’ (27), unregistered drinking water supplier (excluding marae) (7), or an individual water drinker/ consumer (5). Of the responses received that identified as ‘other’, most were water professionals (14) or schools (9).



Below is a summary of the responses received to specific questions asked in the consultation. This table does not summarise individual comments on questions. Not all respondents answered every question, and some respondents provided separate written documents in place of answering the individual questions.

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
Rules for supplies that provide drinking water to 1 – 25 people					
	Monitoring for <i>E. coli</i> and total coliforms (VSC.1)	Do you agree with this proposed change?	44	7	2
	Providing the community with all sampling results	Do you agree with this proposed change?	42	10	3
	What to do when the population served by a supply temporarily exceeds 50 people (VSC.3)	Do you agree with this proposed change?	36	11	7
Rules for supplies that provide drinking water to 26 – 100 people.					
Source Water Rules Module	Monitoring surface and ground water sources (S1.1)	Do you agree with the proposed removal of iron from the rules?	68	17	9
		Do you agree with the proposed clarification that source water testing samples must be collected at the abstraction point or treatment plant, prior to treatment and/or mixing with other sources, to align with the original intent of related source water Rules?	74	10	7
	Monitoring roof sources (S1.2)	Do you agree with the proposed removal of benzo[a]pyrene?	71	6	12
		Do you agree with the proposed removal of zinc from the Rules?	72	6	11
	Monitoring for cyanotoxins (S1.4)	Does this formatting change make the steps required to check for and address cyanobacteria risks clear?	68	12	12
	Monitoring after exceeding 50% of a MAV (S1.5)	Do you agree with this proposed change?	77	5	12

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
Treatment Rules Module	Monitoring water leaving the treatment plant (T1.1)	Do the proposed wording and formatting changes make this Rule easier to understand?	83	5	3
		Do you agree with removing the reference to drinking water safety planning from the Rules?	61	19	12
	Making filtration Rules easier to understand (T1.2 & T1.4)	Do the proposed wording and formatting changes make these Rules easier to understand?	79	4	10
	Cartridge filter requirements (T1.3)	Do you agree with this proposed change?	44	30	19

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
	UV (ultraviolet) treatment (T1.5)	Do you agree with the proposed requirement for a 40 mJ/cm ² minimum dose of UV light to be made explicit in the Rules to replace Rules T.15 and T1.6?	69	13	11
		Do you agree with adding the new DIN standard to this list of applicable standards?	61	3	28
		Do you agree with adding the older Önorm standard to the list of applicable standards?	58	4	30
		Do you agree with limiting level 1 supplies to using the set-point dose approach?	47	15	30
		Does consolidating this material into one Rule make it easier to understand UV requirements?	72	8	11
Distribution Rules Module	Monitoring water in the distribution system (D1.1)	Do the proposed wording and formatting changes make this Rule easier to understand?	85	2	5
		Do you agree with removing reference to drinking water safety planning from the Rules?	63	17	12

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
	Backflow management (D1.2)	Do you agree with the clarified requirement to maintain a register?	65	19	9
		Do you agree with the new requirement to test backflow any devices that can be tested at least every two years?	55	26	12
		Is it clear that the proposed Rule would still require suppliers to remove cross-connections that pose a risk to water quality?	46	27	20
Rules for supplies that provide drinking water to 101 – 500 people.					
Source Water Rules Module	Monitoring surface and groundwater sources (S2.1)	Do you agree with these proposed changes to testing frequencies?	61	11	10
		Do you agree with the proposed clarification that source water testing samples must be collected at the abstraction point or treatment plant, prior to treatment and/or mixing with other sources, to align with the original intent of related source water Rules?	64	8	8
	Monitoring roof water sources (S2.2)	Do you agree with the proposed removal of benzo[α]pyrene from the Rules?	51	6	17
		Do you agree with the proposed removal of zinc from the Rules?	53	4	17
	Monitoring after exceeding 50% of a MAV (S2.3)	Do you agree with this proposed change?	65	4	11

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
	Categorising cyanobacteria risk (S2.4)	Do you agree with this proposed change?	69	3	9
	Managing potential cyanotoxin complaints from consumers (S2.5)	Do you agree with this proposed change?	60	10	10
	Monitoring for cyanotoxins (S2.6)	Do you agree that the proposed requirements will make it easier for suppliers to monitor for cyanobacteria and cyanotoxins?	53	10	17
		Do you agree that suppliers should not report on this Rule?	44	18	16
Treatment Rules Module	Monitoring water leaving the treatment plant (T2.1)	Does consolidating this material into one Rule make it easier to understand treatment requirements?	64	8	7
		Do you agree with the proposed new requirement to test for any additional chemicals that are a risk to the supply?	55	12	11
		Do you agree with increasing the requirement for UVT (ultraviolet transmission) monitoring from every three months to every month?	42	25	10
		Do you agree with removing the requirement for there to be a specific number of days between taking samples?	59	10	9
		Do you agree with the removal of the requirement to monitor flow twice a week?	52	13	14

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
Treatment Rules Module	Making the Rules about water passing through or leaving the treatment plant easier to understand (T2.2 and T2.3)	Do the proposed wording and formatting changes make these Rules easier to understand?	64	10	6
	Cartridge filter requirements (T2.4)	Do the proposed wording and formatting changes make this Rule easier to understand?	63	8	9
	UV (ultraviolet) treatment (T2.5)	Do you agree with the proposed requirement for a 40 mJ/cm ² minimum dose of UV light to be made explicit in the Rules and replace Rule T2.1?	56	7	16
		Do you agree with adding the new DIN standard to this list of applicable standards?	58	3	16
		Do you agree with including the older ÖNORM standard to the list of applicable standards?	54	2	21
		Do you agree with limiting level 2 supplies to using the set-point dose approach?	35	18	26
		Does consolidating all UV Rules together into one and adjusting the formatting make them easier to understand?	61	9	8
	Proposing that the dedicated Rule for physico-chemical samples is removed (T2.24)	Do you agree with removing this Rule?	65	2	11
Distribution Rules Module	Monitoring water in the distribution system (D2.1)	Do you agree with the proposed removal of zinc from the Rules?	62	10	9

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
		Does removing a required number of days between taking FAC, <i>E. coli</i> and total coliforms samples make compliance easier for suppliers, while appropriately maintaining water suppliers' understanding of water quality?	65	9	7
		Does more detailed information for how to test for metals make compliance easier?	63	6	11
		Do the proposed wording and formatting changes make these Rules easier to understand?	64	4	9
	Maintaining FAC (free available chlorine) in the distribution system (D2.2)	Do the proposed wording and formatting changes make this Rule easier to understand?	65	5	10
	Backflow management (D2.3)	Do you agree with the new requirement to record backflow test results?	56	13	10
		Do you agree with the clarified requirement to maintain a register?	54	12	12
		Is it clear that the proposed Rule would still require suppliers to remove cross connections that pose a risk to water quality?	35	26	17
Rules for supplies with changing community populations					
Varying Populations Module		Do you agree with including 'Very Small Communities' supplies in these 'changing population' Rules?	81	18	20

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
	This Rule applies if a supply that usually serves 100 people or fewer temporarily exceeds 100 people (VP.1)	Do you agree with the other changes proposed above?	80	16	23
	This Rule applies if a supply that usually serves 100 or fewer people temporarily exceeds 500 people (VP.2)	Do you agree with including 'Very Small Communities' supplies in these 'changing population' Rules?	72	15	28
		Do you agree with the other changes proposed above?	69	14	31
	This Rule applies if a supply that usually serves 101-500 people temporarily exceeds 500 people. (Treatment requirements (VP.3))	Do you agree with the changes proposed above?	74	7	34
	This Rule applies if a supply that usually serves 101-500 people temporarily exceeds 500 people. (Distribution requirements (VP.4))	Do you agree with the changes proposed above?	72	10	32
Proposed updates to general Rules					
	Proposed reporting for supplies that serve 25-100 people (Level 1 Rules) (R1.1)	Do you agree with level 1 supplies only reporting annually, instead of every six months?	98	11	14
	Proposed reporting for supplies that serve 100-500 people (Level 2 Rules) (R2.1 and R2.2)	Does consolidating and simplifying these Rules make it easier to understand reporting requirements?	85	17	23
Proposed timeframe for any Rules changes to apply					

	Rule summary	Consultation Question	Submission Response		
			Yes	No	Don't know
	What would change for suppliers if proposed Rules apply from 1 January 2025?	Do you think that the proposed 1 January 2025 effective date is achievable from your perspective?	85	25	22

Key themes from submissions

General themes from submissions

- Overall support for the proposed changes to make the Rules more straightforward and streamlined, and reduce overall effort required to demonstrate compliance with Rule requirements.
- Support for further guidance to help drinking water suppliers understand Rule requirements and how to implement the proposed changes. Submitters supported guidance on topics such as how to appropriately manage benzo[a]pyrene risks, effectively assessing and managing backflow risks, and managing cyanobacteria risk.
- Most submitters supported removing references to drinking water safety plans (DWSPs) and source water risk management plans throughout the Rules. A small number of submitters recommended that references to DWSPs be kept in the Rules to help reinforce their importance in identifying and managing risks to a supply.
- Some submitters had concerns about the burden and cost of testing backflow prevention devices, and the availability of qualified persons to carry out testing.
- Concern from some councils that they would not have enough time to make changes to their reporting systems if the updated Rules come into effect from 1 January 2025.

Themes from community and private supplies

- Some small rural supplies and marae face challenges meeting existing water sampling and monitoring requirements, such as getting samples to accredited laboratories.
- Small drinking water suppliers need more support and assistance from the Authority to help them comply with the Rules.
- Rural schools' capability to meet Rules requirements. Ongoing support is needed for rural schools to help understand and meet revised Rule requirements.
- Some small suppliers need more clarity about the difference between the Rules and Acceptable Solutions, which enable the use of end-point treatment.

Technical themes

- Most submitters supported proposed changes to source, treatment and distribution monitoring Rules for small and medium supplies.
- Most submitters supported removing zinc, iron and benzo(a)pyrene from the Rules. Some councils and consultants raised concerns about the impact iron can have on disinfection methods, such as for groundwater supplies, and that while iron does not have a MAV, it does have an aesthetic value.
- Some councils had concerns about the cost implications of only allowing a set-point dose approach and removing the calculated dose approach as an option for UV (ultraviolet) treatment.
- Requests for further specific guidance on managing cyanobacteria risk, cyanobacteria risk categorisation and reporting requirements.
- Some consultants were concerned about removing the requirement to create a cyanobacteria risk plan.

- Some councils had concerns that the proposed changes to monitor for cyanobacteria were too prescriptive and that more flexibility should be given to suppliers to manage risks.
- Some councils supported a continuous monitoring option for level 1 and 2 treatment and distribution modules including developing specific Rules to allow this option.
- Concern that it is not clear the proposed backflow Rules would still require suppliers to remove cross-connections that pose a risk to water quality.
- Mixed feedback on proposed changes to require a cartridge filter system that includes a 5 micron or smaller pore size for all water abstracted from a depth of greater than 10 metres. Several submitters asked for clarification on cartridge filtration requirements, for example, nominal vs absolute.
- Some consultants had concerns that supplies providing drinking water to 1 – 25 people could potentially provide drinking water with no treatment when their population temporarily increases under the revised Varying Population (VP) Rules.
- Requests for clarification around when a temporary population increase will trigger the Varying Population Rules.
- Some submitters opposed removing the requirement for supplies providing drinking water to 1 – 25 people to provide the community with all sample results.
- Some submitters were opposed to very small communities being required to test for *E. coli* and total coliforms one week before their population temporarily exceeds 50 people, if the supplier knows that the population increase will happen, as it can be difficult to predict population increases.

Other themes

- Some submitters considered that chlorination should not be required for supplies that provide drinking water to 101 – 500 people, or for self-supplied buildings, on the basis that the costs of compliance were not proportionate to the public health risks.
- A small number of submitters had concerns that reporting changes may not simplify reporting requirements or reduce workload.
- Some submitters raised concerns about the costs of updating their systems and processes to meet new reporting requirements.
- Some submitters were concerned about the proposal to make electronic reporting mandatory, and the capability of small suppliers, particularly non-council suppliers, to meet this requirement. Submitters asked for more guidance about the definition of electronic reporting, and for manual reporting templates such as spreadsheets to remain an option.

Next steps

We are considering your feedback and deciding on any Rule changes. We plan to share the outcome of this consultation with you by late November.