



Water Services Authority
Taumata Arowai

Compliance, Monitoring and Enforcement Strategy

2025-28





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Foreword

It's our pleasure to introduce the Water Services Authority – Taumata Arowai (the Authority) Compliance, Monitoring and Enforcement Strategy 2025–28.

This strategy provides those who do the critical work of supplying drinking water – as well as the people they supply water to – with a transparent view of how the Authority will regulate the safety of drinking water over the next three years. To this end, this strategy sets out our priorities, expectations of suppliers, and when and how we take action to safeguard public health.

This strategy reflects a shift from establishment to system improvement

Since our establishment in November 2021, our focus has been on getting in place key elements of the new regulatory system agreed as a result of the Government's inquiry into the August 2016 outbreak of waterborne illness in Havelock North. This has included setting Drinking Water Quality Assurance Rules and related reporting requirements, and ensuring the suppliers who follow them have provided us with drinking water safety plans for their supplies.

Looking forward, drinking water suppliers and the New Zealand public can expect to see a step change in our regulatory approach. Building on insights and understanding gained during our initial years as drinking water regulator, we'll increase our focus on taking practical, appropriate action to ensure related public health risks are effectively managed.

Looking wider, we will continue to support the supply of safe drinking water in a cost-effective way through our work updating the Drinking Water Quality Assurance Rules and Acceptable Solution compliance options – making them easier to understand and follow.

Getting the basics in place remains a key focus

This strategy continues and accelerates recent efforts to ensure the basics of safe drinking water are in place. We will soon complete our programme requiring all public supplies to have essential treatment in place – delivering safer drinking water for hundreds of thousands of people across New Zealand.

Over the coming years, we'll extend our focus to ensure these barriers are operating effectively. We'll also work to ensure private and community supplies have the basics of safe water in place. We'll progressively develop practical guidance and how-to information to support this.

By 2028, we expect to see:

- all public supplies providing safe, reliable drinking water to their communities – that means water that's protected against microbial and chemical contamination each and every day, supplied from a source that's actively monitored and protected
- a reduced need for consumer advisories – in particular long-term boil water notices, which are far more common in New Zealand than in countries that we compare ourselves with.

Addressing shared challenges

This strategy uses insights from data to enable proactive and targeted regulatory activity that considers suppliers' starting points and risk profiles.

We have set clear expectations for three particular supplier groups. This will be complemented by sector plans, which focus in on suppliers that face similar challenges (e.g. mainly rural schools that supply their own water and mixed-use rural drinking water supplies). This approach is aimed at actions that deliver the biggest benefits to people in New Zealand.

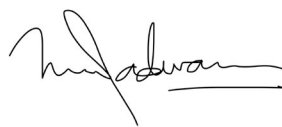
Adapting to an evolving environment

This strategy acknowledges the evolving environment for both suppliers and us. This includes the need to use available resources effectively, adjust appropriately to new legislation and provide the necessary regulatory oversight.

We recognise that suppliers are entering into new service delivery arrangements under Local Water Done Well – the Government's plan to address New Zealand's long-standing water infrastructure challenges. This will provide new opportunities to deliver outcomes for safe drinking water.

As the water sector evolves, our vision remains the same: safe water every day for everyone. It will take all of us working together over decades to achieve this.

Along the way, we'll continue to show leadership – shining a light on drinking water safety risks and working with suppliers to improve the supply of safe and reliable drinking water to people in New Zealand.



Raveen Jaduram
Board Chair



Allan Prangnell
Chief Executive

Introduction

New Zealand's drinking water regulatory system is designed to ensure drinking water suppliers provide safe drinking water to consumers. It is centred on public health and its foundations are the Water Services Act 2021 and the secondary legislation made under it, including the Water Services (Drinking Water Standards for New Zealand) Regulations 2022 and the Drinking Water Quality Assurance Rules 2022 (the Rules).

This strategy sets out how the Water Services Authority – Taumata Arowai (the Authority)¹ will use its regulatory functions and powers over the next three years.

It outlines:

- key risks to drinking water that we expect suppliers to manage
- how we will hold drinking water suppliers of different sizes and characteristics to account for meeting their duties and obligations
- what suppliers and communities can expect from us, particularly regarding the general use of regulatory tools.

This *Compliance, Monitoring and Enforcement Strategy 2025–28* builds on the foundations of the previous strategy and responds to what we've learned over this time.

In this strategy you will notice a shift in intended regulatory activity from gathering data and assessing plans to ensuring suppliers are effectively treating contaminants and addressing immediate and ongoing risks related to source water, treatment and distribution systems.

We remain committed to an approach that prioritises action to address the biggest risks to public health. This strategy strengthens our risk-based approach by focusing on four key risks to drinking water safety – microbial contamination, chemicals, ineffective treatment processes and loss of supply.

It provides transparency about how we will engage with suppliers taking account of supply complexity, performance and related risks. It signals that ongoing non-compliance with fundamental safety requirements is unacceptable, while recognising the need for improved guidance for some suppliers.

We recognise our responsibilities and obligations under the Treaty of Waitangi and are committed to improving how our regulatory approach responds to them. We will routinely consider what actions we may need to take to uphold our Treaty obligations when performing our compliance, monitoring and enforcement functions, and will work closely with the sector as they go about meeting their obligations as part of a whole-of-system approach. We will also satisfy specific obligations that we have when those functions affect activities in the Waikato, Upper Waipā and Whanganui River catchments, or other areas where similar obligations arise in the future.²

Over the next three years, through actions taken by us and drinking water suppliers, this strategy will result in more people in New Zealand having safe drinking water.



¹ The Local Government (Water Services) Bill proposes a name change from Taumata Arowai—the Water Services Regulator to the Water Services Authority—Taumata Arowai. For ease of reference this document uses the proposed new name, or simply 'the Authority'.
² In accordance with the Ngati Tuwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010, the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, the Nga Wai o Maniapoto (Waipa River) Act 2012 and the Te Awa Tupua (Whanganui River Claims Settlement) Act 2017.

Setting the framework for the regulatory system through Local Water Done Well

At the time of preparing this strategy, the Local Government (Water Services) Bill is before Parliament. The Bill is the third piece of legislation in the Coalition Government's three-stage process for implementing Local Water Done Well and is expected to be passed in 2025.

Key changes proposed in the Bill in its current form at the time of writing that are critical to the regulatory approach outlined in this strategy include:

1. more emphasis on the Authority taking suppliers' compliance costs into account while protecting and promoting public health outcomes relating to safe drinking water
2. changes to enable us to issue exemptions proactively
3. new powers to encourage improved verification/sector ownership of drinking water safety plans (DWSPs) and other information
4. changes to exclude some supplies serving 25 or fewer people from the regulatory regime.

These proposed changes are reflected in this strategy. Should the final form of the legislation substantially change when passed through the remaining stages of the Parliamentary process, we will consider whether to amend aspects of this strategy as appropriate.

The Government is also progressing reforms to the resource management system, which we will monitor for implications for our compliance, monitoring and enforcement activities.



Evidence-led regulatory priorities

This strategy focuses on addressing key risks to public health and is informed by data, evidence and insights collected throughout our first three years as regulator. The information drinking water suppliers provide to us when they register their supplies, report on the Rules and water quality monitoring, and (together with accredited laboratories) notify us of drinking water safety or compliance issues, forms the primary evidence base we use to determine our regulatory priorities. This information is compiled and published annually in our Drinking Water Regulation Report (DWRR).

This strategy uses findings from the [2022](#), [2023](#) and [2024](#) DWRR to ensure our compliance, monitoring and enforcement activities are targeted towards risk, proportionate and responsive to the realities of supplying drinking water in New Zealand. The strategy is also informed by sector engagement and outreach, as well as insights from regulatory activities (e.g. our review of DWSPs and incident responses).

As a critical input into this approach, we expect suppliers to meet their regulatory responsibilities and take ownership of the risks to drinking water safety that affect their supplies. This includes:





- ensuring that basic treatment barriers are in place and operating effectively
- monitoring water quality
- reporting on the compliance and performance of their supplies in line with their legal requirements.

This enables both us and the supplier to identify the right indicators of risk, and act fast with the benefit of an evidence base to protect the people they serve if something goes wrong.



Focus on four key risks to safe drinking water

If risks to safe drinking water are not appropriately managed, it can cause serious harm to people and the environment. Our regulatory priorities for the next three years seek to address four key hazards or risks that can impact drinking water safety.

Risk	Potential consequence	Our expectation
 <p>Microbial contamination</p> <p>Happens when harmful microscopic organisms (e.g. bacteria, viruses or protozoa) get into drinking water.</p>	<ul style="list-style-type: none"> • People are at increased risk of getting sick from their drinking water if it isn't properly treated for harmful bacteria, viruses and protozoa (e.g. microscopic parasites like Cryptosporidium). • Drinking water contamination is known to result in sporadic cases of illness and can cause outbreaks, serious illness or even death. 	<p>Our first priority is to ensure all supplies have appropriate treatment in place to remove or inactivate harmful microorganisms.</p>
 <p>Chemical contamination</p> <p>Happens when chemical contaminants (e.g. arsenic, lead, nitrates) get into water sources or are introduced during treatment and distribution processes.</p>	<ul style="list-style-type: none"> • Long-term exposure to certain chemicals can harm people's health over time. For example, by: <ul style="list-style-type: none"> » affecting brain development in children » increasing the risk of cancer or organ damage. • Chemical exposure often doesn't cause symptoms immediately. It's important that drinking water is tested regularly so that they don't go unnoticed. 	<p>Suppliers should test for chemical contaminants that can put people's health at risk and take appropriate action to address these risks.</p>
 <p>Physical contamination leading to ineffective treatment</p> <p>When source water is cloudy from dirt, algae and other particles, this can make treatment systems ineffective at removing or inactivating harmful contaminants.</p>	<ul style="list-style-type: none"> • These pose risks to drinking water safety and public health by: <ul style="list-style-type: none"> » making treatment processes less effective » increasing the risk of harmful contaminants getting into drinking water. • People might choose to use another water source that may be less safe if the drinking water they're supplied doesn't look clear or tastes or smells strange. 	<p>Suppliers should carry out appropriate monitoring to quickly detect and fix issues.</p>
 <p>Loss or interruption of supply</p> <p>Can be caused by infrastructure failure, poor operational practices, issues during planned outages or natural hazard events.</p>	<ul style="list-style-type: none"> • Can leave people without enough safe water to meet essential drinking, hygiene or sanitary needs. • Even short-term outages can cause health risks and undermine public trust in the safety and reliability of a water supply. 	<p>Suppliers should have robust plans in place to reduce the frequency and impact of unexpected events.</p>

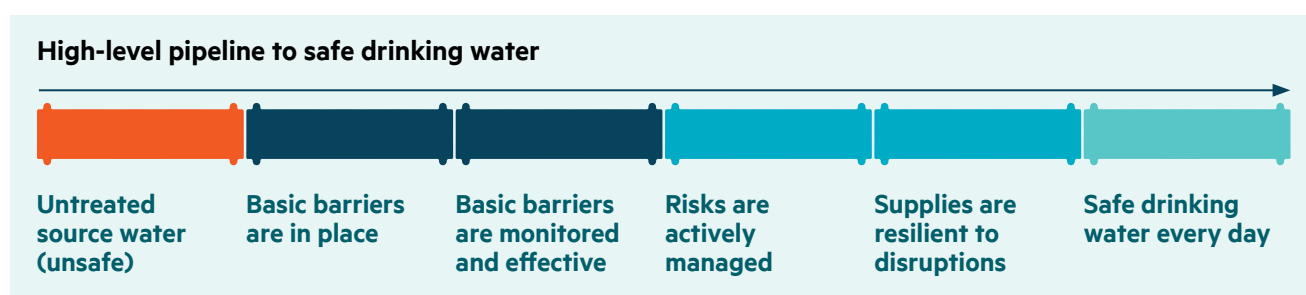
Suppliers have a responsibility to tell the people they serve, and us, about risks to drinking water safety or sufficiency

Actions to address key risks

Every day, drinking water suppliers play a vital role in supporting the health and wellbeing of people across New Zealand by providing them with safe, reliable drinking water.

We expect all suppliers to actively identify risks and take targeted action to reduce the chance of people being harmed.

The pipeline to safe drinking water is pictured below. Each point in the pipeline reflects a key step a supplier can take to lift supply performance and reduce the risk of people getting sick from their drinking water. These are the areas where suppliers can expect the greatest focus from us.



This strategy is focused on ensuring all suppliers are taking clear steps towards providing safer drinking water. Even when a supplier has reached the end of this pipeline (safe drinking water every day) there will always be risks that need to be actively managed to keep water safe to drink.

Each drinking water supplier is at a different starting point in this pipeline. We expect all supplies to have basic treatment barriers by the end of this three-year strategy, with higher expectations of groups of suppliers that we would expect to have mature risk management practices in place.

Expectations for suppliers

Drinking water suppliers have a responsibility to manage risks to public health arising from their drinking water and to communicate transparently with us and the people they supply water to.

We expect drinking water suppliers to be aware of this responsibility and the severity of the potential public health risks if this responsibility is not met.

There is a significant diversity in drinking water suppliers, from large metropolitan councils to small community-owned schemes. Regardless of these differences, all suppliers are expected to:

- identify risks that could impact their supply, people or the environment
- manage identified risks so that they don't cause harm
- respond promptly and appropriately to incidents (e.g. treatment failure or network contamination)
- be transparent with consumers and advise them when their drinking water is or may be unsafe.

While all suppliers are responsible for delivering safe and sufficient drinking water, our expectations and the way we engage are informed by how each supply is governed and operated. This helps us ensure our regulatory approach is proportionate, consistent and targeted to where risk is highest.

As part of this approach, we've identified three broad supplier groups:

1. **Council suppliers:** council suppliers, including metropolitan and provincial councils (which generally have more capability and resources) and rural councils (which may face different capacity and resourcing constraints).
2. **Central government and commercial suppliers:** government agencies and commercial suppliers (including water carriers).
3. **Community suppliers:** community groups, marae, self-supplied schools and others that may have more limited resources, time or related technical capabilities.

Our general expectations and approach will differ across these three supplier groups. We will continue to engage with suppliers on critical safety issues and incidents on a case-by-case basis.

Factors we considered when determining these groups of suppliers included population served, funding and governance ownership arrangements, and the number of individual supplies operated by the supplier.

This approach complements the Rules, which recognise variability in the size and complexity of supplies and set proportionate requirements accordingly. This enables us to tailor expectations and regulatory actions to the size, capability and risk profile of a supplier.

The visual below outlines how expectations will generally apply across supplier groups indicating where, *at a minimum*, along the pipeline to safe drinking water we expect all suppliers within that group to be by 2028.



Sector plans

Where there is a supplier group that is an exception to the general groupings, or carries a higher level of risk, we will address these issues through a targeted sector plan.

We will prioritise introducing sector plans for self-supplied schools and mixed-use rural water schemes first. Over the next three years, further sector plans may be introduced to provide a greater regulatory focus, and transparency of approach, to selected priority groups.

Expectations for other groups that provide drinking water

The Appendix includes expectations for mixed-use rural suppliers, self-supplied schools, very small suppliers and unregistered suppliers.

Expectations for council suppliers

This group includes all council suppliers and council-controlled organisations, and any entities created as part of service delivery models developed under Local Water Done Well. While the structure and size of councils and their water service delivery models vary, they share a common governance model and accountability to the public.

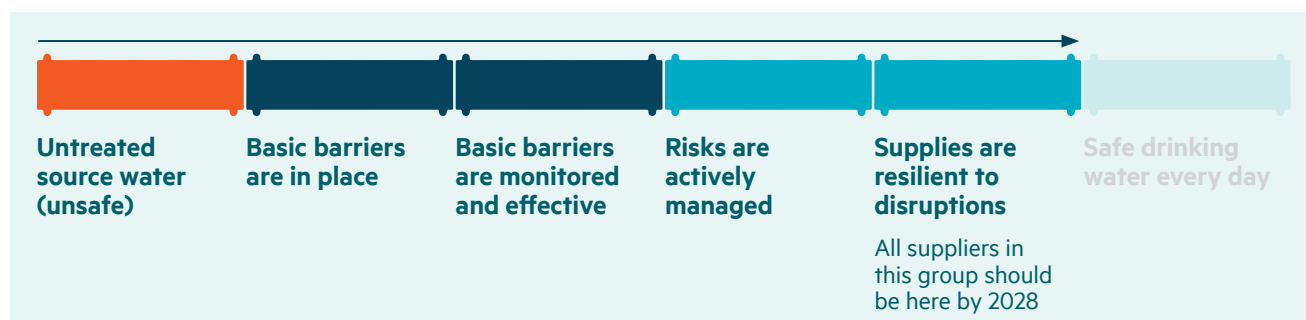
We recognise that not all councils face the same challenges. Our expectations remain high, but we will continue to consider supplier context (e.g. population served, existing infrastructure and available resourcing) when determining the most appropriate regulatory response.

We expect council suppliers to:

- fully comply with the Rules or an Acceptable Solution and associated reporting requirements
- fully comply with New Zealand's Drinking Water Standards
- respond promptly to drinking water safety risks with appropriate action
- maintain robust risk management plans, including DWSPs
- demonstrate progress towards resilience (e.g. planning for outages or significant hazardous events).

Outcome by 2028:

Council suppliers lead the way in effectively managing risks, demonstrating full compliance, and building a strong culture of drinking water safety. We expect the larger, better resourced councils and entities to model excellence and support overall system improvement.



What this looks like in practice

2025-26

- Basic treatment barriers are installed and operational.
- Treatment barriers are working effectively.
- Suppliers address the root cause of drinking water safety issues.
- We will have low tolerance for repeat *E. coli* notifications or evidence of ineffectively operated treatment barriers.
- We expect all council supplies are already registered.

2026-27

- Achieve full compliance with the Rules or an Acceptable Solution.
- Submit accurate, complete reporting to provide assurance that treatment barriers are operating effectively.

2027-28

- DWSPs show robust processes are in place to identify and manage safety risks and show progress over time to mitigate key risks.
- Contamination events resulting in the need for consumer advisories are rare.

How you will know you're on the right track

- ✓ *E. coli* notifications are rare and promptly addressed.
- ✓ No long-term consumer advisories³ are in place.
- ✓ Comparing DWSPs over time shows you are taking action to manage key drinking water safety risks.
- ✓ You fully comply with the Rules and provide timely accurate reporting.

³ There isn't any specific time period associated with a 'long-term' consumer advisory. We use the term to refer to advisories that remain in place for more than a temporary period of active risk mitigation. 'Short-term' consumer advisories are in place while steps are taken to address an underlying safety issue.

Expectations for central government and commercial suppliers

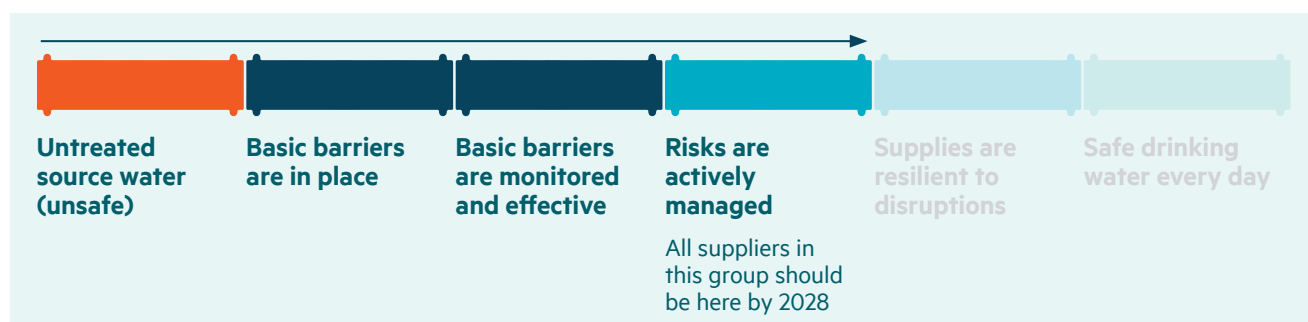
This group includes central government-owned suppliers and privately-owned and commercial suppliers. Commercial suppliers are organisations that generally operate to make a profit. They may or may not sell drinking water, but they all provide water for people to drink.

Outcome by 2028:

Central government and commercial suppliers use reliable treatment and monitoring practices and continue to build their ability to manage risks to drinking water safety.

We expect central government and commercial suppliers to:

- register all of their supplies by the legislated deadline
- ensure that basic treatment barriers are in place and operating effectively to the level required by the Rules or an Acceptable Solution
- maintain regular and accurate monitoring and reporting to meet New Zealand's Drinking Water Standards
- respond promptly to drinking water safety risks with appropriate action
- work towards managing risks across the full supply system – from source water to distribution.



What this looks like in practice

2025-26

- Carry out physical works to ensure basic treatment barriers are in place.
- Identify and plan for any physical works needed to fix treatment barriers that are not operating effectively.

2026-27

- Put the right processes in place to make sure that treatment barriers are operating effectively.
- Demonstrate that monitoring, reporting and risk management practices are improving.

2027-28

- Show clear progress lifting performance across all parts of your drinking water supply and related management activities.
- Meet all reporting requirements under the Rules or an Acceptable Solution.
- Register all supplies by the legislated deadline.⁴

How you will know you're on the right track

- ✓ Reduced frequency of *E. coli* and chemical notifications.
- ✓ No long-term consumer advisories are in place.
- ✓ Increased compliance with the Rules, including more timely and accurate reporting.
- ✓ Increased quality of DWSPs.

⁴ The Local Government (Water Services) Bill proposes to extend the deadline for registration for supplies operating prior to November 2021 that were not registered under the Health Act 1956 from four years to seven years (i.e. November 2028).

Expectations for community suppliers

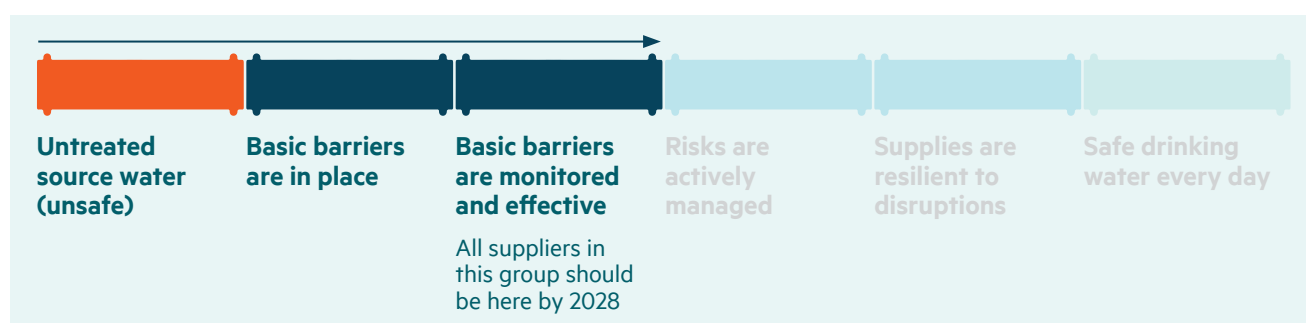
This group includes community halls, marae and some schools, as well as other community facilities that are not run for a commercial purpose.

Outcome by 2028:

Community suppliers understand their responsibilities, take practical steps toward compliance and have basic drinking water safety measures in place.

We expect community suppliers to:

- choose a compliance pathway (Rules, Acceptable Solution or apply for an exemption)
- install basic treatment barriers (in line with the Rules or an Acceptable Solution)
- regularly test water quality and respond promptly to drinking water safety risks with appropriate action
- build understanding of drinking water safety risks and how to manage them.



What this looks like in practice

2025-26

- Select a compliance pathway and install basic treatment barriers.
- Test and monitor water quality in line with the Rules or Acceptable Solution requirements.

2026-27

- Begin reporting against basic water quality monitoring requirements to show that treatment barriers are operating effectively.

2027-28

- Put the right processes in place to make sure treatment barriers continue to operate effectively.
- Demonstrate that monitoring, reporting and risk management practices are improving.

How you will know you're on the right track

- ✓ You've registered your supplies with us and confirmed whether you will follow the Rules or an Acceptable Solution.
- ✓ You promptly notify us when you receive a lab result that shows that a contaminant exceeds a maximum acceptable value under New Zealand's Drinking Water Standards, and you act quickly to respond to drinking water safety issues.
- ✓ If you follow the Rules, you meet all reporting requirements and have submitted a DWSP to us.

Our regulatory approach

This section sets out what drinking water suppliers can expect from us and what outcomes we are working to achieve through the actions we take.

Our approach to compliance, monitoring and enforcement is designed to be equitable, transparent and proportionate to risk, to support drinking water suppliers to provide safe drinking water and meet their responsibilities.

What factors we consider

We understand different suppliers are at different starting points in the pipeline to safe drinking water. We nevertheless expect all suppliers, regardless of size, to grow their capability and build a culture of drinking water safety.

Depending on the factors below, we adjust how we work with suppliers.

- The size and complexity of a supply.
- The level of risk to the people using water from a supply.
- A supplier's history of performance and compliance.
- A supplier's willingness to engage with us and make improvements.

We are committed to acting in a way that is equitable, consistent and transparent as we:

- support and guide new or small suppliers who are trying to do the right thing
- monitor and engage where we see issues or risks that need attention
- act where there's ongoing non-compliance or risk of harm
- ensure our regulatory activities and decisions are proportionate to the issues, risks and harms they address, including taking costs to suppliers and communities into account
- continue to prioritise protecting public health to serve the public interest.

This approach helps us focus our efforts where they will make the biggest difference, while being fair and consistent with everyone.

How we operate

We are committed to operating in a way that is:

- **Transparent:** We're clear about our priorities and expectations of suppliers in meeting these.
- **Risk-based:** We prioritise our actions and expectations to address the biggest risks to public health.
- **Proactive:** We anticipate risks, provide proactive guidance and support and look for opportunities to improve how we do things.
- **Proportionate:** We consider the size, complexity and risk profile of a supplier or supply, as well as the costs of different options to improve supply performance or achieve compliance.

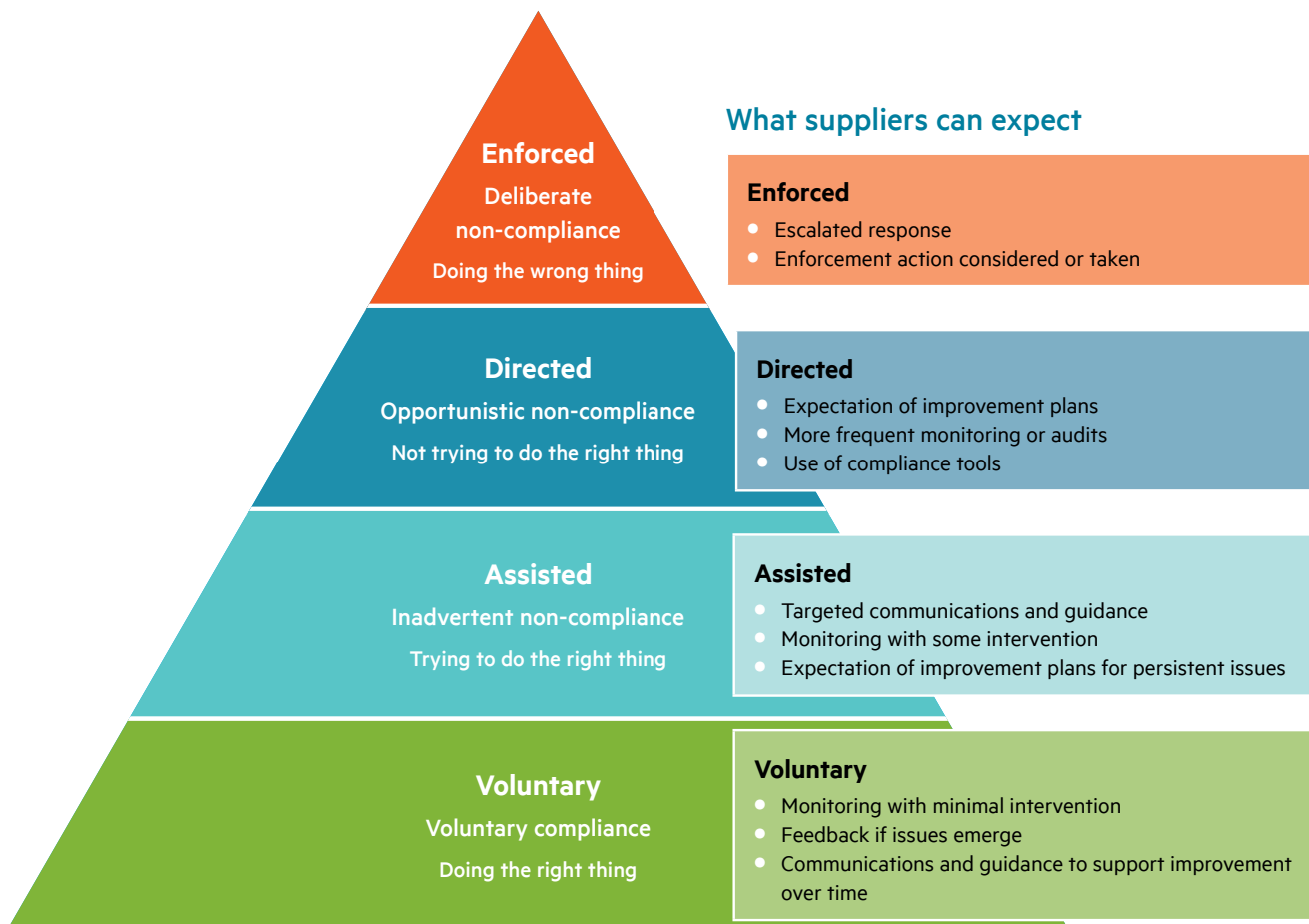
What suppliers can expect from us

We use the VADE (Voluntary, Assisted, Directed, Enforced) model to guide how we work with suppliers. This model is a tool that supports regulators to evaluate behaviours and choose an appropriate response or intervention.

This model reflects a graduated regulatory approach, where our level of involvement increases based on the level of risk and supplier performance. It helps us match our regulatory response to the situation.⁵

⁵ There will be situations where compliance or enforcement action is required to guide urgent remedial actions relating to an acute public health risk, even if a supplier is trying to do the right thing in the circumstances. We can use any tool at any time, when we consider it appropriate and proportionate to do so. We are not required to use a particular tool in the first instance, or as a prerequisite to another action.

The VADE model makes clear what suppliers can expect from us



How we use a risk-based approach to target our efforts

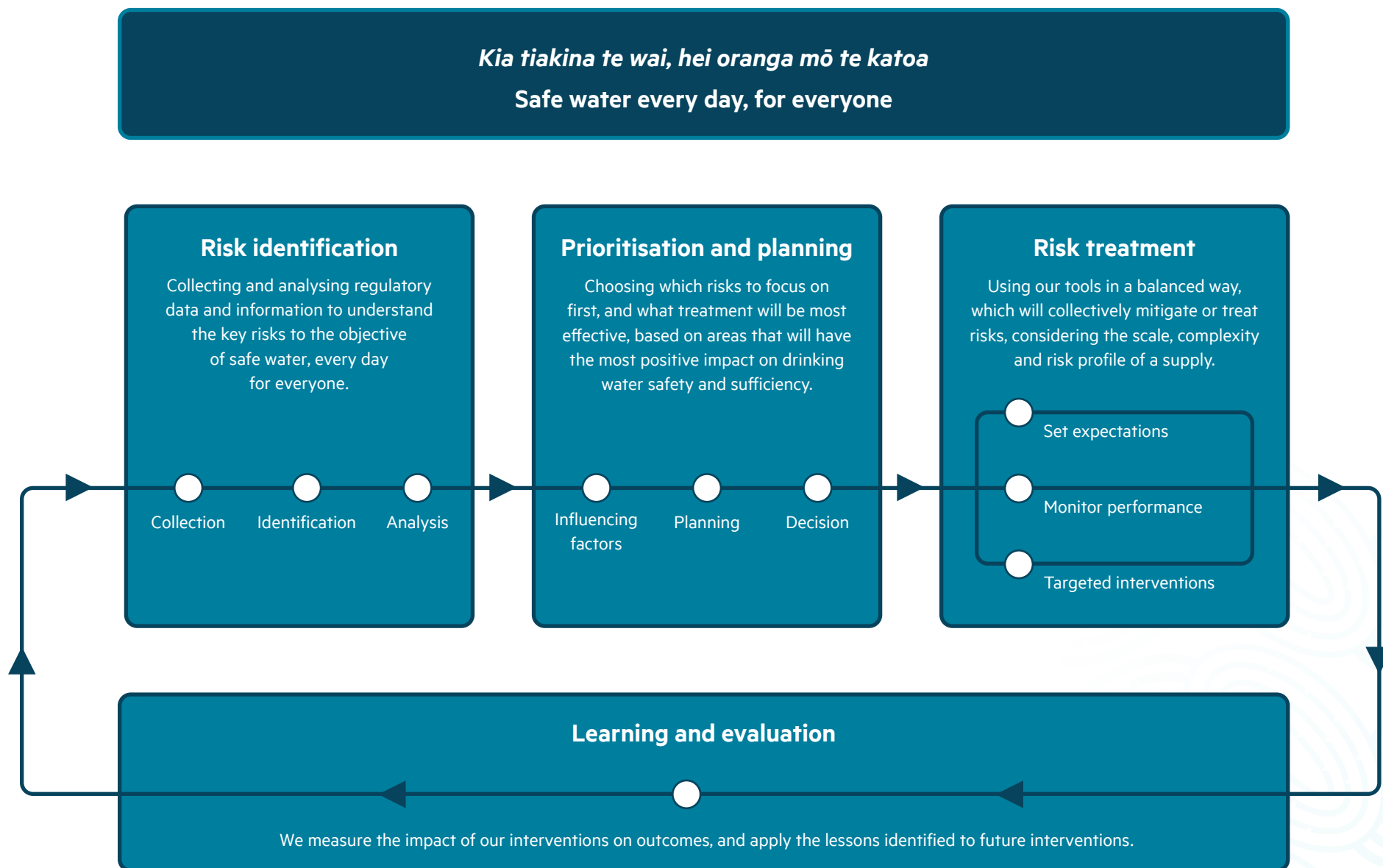
We'll focus our regulatory efforts on suppliers, issues and practices that represent the highest risks to public health.

As outlined above, our primary focus is on ensuring that drinking water suppliers demonstrate that:

- they have basic treatment barriers in place
- these barriers are operating effectively to prevent people from being supplied with unsafe or insufficient water (e.g. from microbial contamination, chemical contamination, ineffective treatment processes leading to contamination or loss of supply.)

We will analyse data from multiple sources to understand emerging risks and inform our priorities over time.

How we prioritise and address risks



Guidance, monitoring and enforcement

We have a range of tools that we can use to help ensure suppliers provide the communities they serve with safe and sufficient drinking water.

Guidance – helping suppliers understand what they need to do

Encouraging improvement – we'll support suppliers to provide safe water every day

We use a range of tools to help suppliers keep improving their practices – including education, guidance, tailored information and reasonable time to act – especially when they are making genuine efforts to do the right thing.

We'll use these approaches before reaching for stronger enforcement tools where:

- there is not a significant risk to public health
- they are likely to lift performance and reduce risk.

Making expectations clear – so suppliers know what's required

We'll provide suppliers with clear rules, standards and guidance so that they know:

- what's required of them and by when
- how to meet their obligation to provide safe drinking water, as well as other legal duties.

Providing learning opportunities – to help suppliers build capability

By providing information, learning opportunities and practical guidance, we aim to:

- build knowledge and capability within the water sector
- minimise the need to use enforcement tools.

For all suppliers: We'll provide resources and guidance designed to support suppliers to strengthen their systems and manage risks effectively. We will focus on areas where the risks to public health are highest.

For community suppliers: We'll focus on building suppliers' understanding of risks to public health and access to guidance on how to meet their responsibilities and supply safe drinking water.

Monitoring compliance – checking how suppliers are performing

We monitor key aspects of supplier compliance with their responsibilities to ensure that they:

- take prompt action to address risks
- have appropriate systems, processes and practices in place to operate their supplies effectively and protect public health.



Types of monitoring we do

Monitoring tool	Description	When it becomes a compliance concern
Notifications of New Zealand's Drinking Water Standards (the Standards) exceedances	<ul style="list-style-type: none"> Registered suppliers and laboratories must notify us when drinking water testing indicates that substances exceed the maximum amounts acceptable (called a maximum acceptable value or MAV) under the Standards. We analyse these notifications to ensure suppliers appropriately manage exceedances and address the root causes of these issues. 	<ul style="list-style-type: none"> Failure to notify us of a MAV exceedance. Failure to take appropriate response action.
Reporting on the Drinking Water Quality Assurance Rules (the Rules)	<ul style="list-style-type: none"> We monitor how well suppliers are following the Rules, as this demonstrates that they are providing safe drinking water and helps to ensure that public health is protected. 	<ul style="list-style-type: none"> Failure to report on the Rules. Submission of incomplete or inaccurate data.
Drinking water safety plans (DWSPs)	<ul style="list-style-type: none"> We review DWSP submitted to us by suppliers – see separate call out box for more information. We may initiate a review following an incident, repeat notifications or failure by a supplier to submit accurate reporting data. We will also carry out spot check reviews of these plans. 	<ul style="list-style-type: none"> A plan does not demonstrate an effective multi-barrier approach.
Consumer advisories	<ul style="list-style-type: none"> We treat long-standing consumer advisories, or repeated short-term advisories, as indicators of systemic non-compliance unless they are in place to fulfil a requirement of a general exemption or an enforceable undertaking. 	<ul style="list-style-type: none"> A long-term consumer advisory is in place with no clear pathway to resolution.
Site inspections	<ul style="list-style-type: none"> If non-compliance is suspected or identified, we may undertake a site inspection to confirm that the supplier is taking appropriate action, or to understand the severity of the non-compliance. We may also require a supplier to provide information to us to this effect. 	<ul style="list-style-type: none"> A significant public health risk is identified. Information gathered during the site inspection is inconsistent with self-reported data.

Our approach to reviewing drinking water safety plans

This strategy signals a shift in how we review DWSPs, as required under section 32 of the Water Services Act 2021.

Under the previous strategy, we focused on ensuring all council DWSPs were submitted and completed desktop reviews, including in-depth feedback for some of these plans. This work, alongside broader regulatory insights, has helped shape a more targeted, risk-based approach.

Our new approach is built on two key shifts:

1. **Focusing on effective physical protections.**

By taking a risk-based approach, informed by areas of non-compliance identified in the earlier programme of reviews, we are shifting the focus of safety plan reviews to a concentration on whether a multi-barrier approach to drinking water safety is in place and working effectively. This is a foundation of this strategy.

2. **Strengthening governance ownership.**

To support a culture of drinking water safety, we expect all suppliers to treat these plans as living documents. This looks like actively using them to manage their supplies, keeping them up to date as new risks arise and taking action to mitigate key risks. We expect those in governance and leadership roles to understand and take ownership of these plans. We will encourage the governors and managers of suppliers to take a more active role in reviewing, understanding and signing off their DWSPs. This may include using new tools arising through the Local Government (Water Services) Bill to encourage stronger accountability.

DWSPs remain a core regulatory requirement and should be actively used by suppliers to manage key risks to their supplies, unless an Acceptable Solution is used or an exemption is obtained. We will continue to use them to inform our engagement with suppliers, site visits, incident responses and investigations – while promoting a drinking water safety culture across the sector.

Our approach to monitoring registered supply compliance

- **We use data to focus our efforts:**

We look at lab results (e.g. when testing results indicate a substance has exceeded the maximum amount acceptable under the Standards) and self-reported information (e.g. non-compliance with the Rules) to inform which supplies need the most attention.

- **We'll ask for evidence when risks are indicated:**

If a supply shows signs of risk, we'll ask suppliers to show us what they're doing about it. This may include reviewing drinking water safety plans or root cause analysis. In some situations, we'll ask for verification to ensure that the information we are being provided is accurate.

- **We may visit supplies:**

If we identify risks, we may carry out an inspection or require the supplier to engage a third party to do an assessment and provide a report to better understand what's happening and what needs to change. This will be more likely to take place for commercial, central government and council suppliers than for community suppliers.

- **We'll do spot checks:**

We'll run a small number of spot checks on DWSPs and accuracy of reporting against the Rules to prompt all suppliers to meet legal requirements.

- **We'll provide practical guidance:**

We will provide clear, useful guidance to help suppliers meet their requirements.

- **We'll focus on building capability where it's needed:**

We will target our capability building efforts and help those who need more support to understand their responsibilities and access the guidance they need to improve things.



Enforcement – taking action to make sure suppliers follow the law

We take enforcement action when it is needed to protect public health or to deter future offending, especially where behaviour is reckless, people have been harmed, or there is a serious risk that they could be.

When we respond to non-compliance, we consider all relevant factors including:

- how much harm has been done, or could be done, to consumers

- whether the supplier is trying to do the right thing
- whether the supplier has a history of deliberate or repeated non-compliance
- how urgently we need to act to protect public health or maintain the community's trust in their drinking water
- whether we need to deter future offending by the supplier or others.

The Authority's enforcement tools

Corrective tools	Punitive tools	Serious issues/emergency tools
<p>Corrective tools are designed to help suppliers get back on track.</p> <p>Directions: Instructions to take specific actions.</p> <p>Enforceable undertakings: A supplier can propose a legally binding agreement to fix the problem and prevent it from happening again.</p> <p>Compliance orders: Legal requirements to fix problems we've identified, or to prevent them from happening in the first place.</p>	<p>If a supplier is unwilling to comply or the risk is high, we may need to take stronger action.</p> <p>Written warnings: Formal notices that become part of a compliance record.</p> <p>Infringement notices: Penalties for minor issues that need quick correction.⁶</p> <p>Civil proceedings: We can apply to the court for orders to force compliance or seek penalties, especially when serious, system-wide improvements are needed.</p> <p>Prosecutions: Mainly used when there's serious, repeated, or intentional non-compliance.</p>	<p>Emergency tools are used where the risk to people requires immediate action.</p> <p>Drinking water emergency powers: We can declare a drinking water emergency if there is a serious risk to public health.</p> <p>Statutory management: The Chief Executive can appoint an operator to act in place of the supplier in cases where the existing supplier has persistently failed to meet their compliance obligations or if there is a serious risk to public health relating to that supply. We can also engage with local authorities, water service providers and suppliers to look for solutions where we consider a supplier is facing a significant problem.</p>

We can use any tool at any time we consider the circumstances and factors mean that is appropriate. We are not required to use a particular tool in the first instance or as a prerequisite to other action.

⁶ At the time of writing no regulations have been made for infringement offences under the Water Services Act 2021.

Approach to exemptions

Under sections 57 and 58 of the Act, we can grant exemptions to drinking water suppliers. These exempt them from many (but not all) duties under the Act. Exemptions are issued with careful consideration of the public health risks involved, and

must be consistent with the main purpose of the Act, which is to ensure that drinking water suppliers provide safe drinking water to consumers.

There are two main types of exemptions under the Act

Exemption type	Exempts suppliers from...	...in cases where...
General	legislative requirements listed in section 57 of the Act	compliance with regulatory requirements is not practicable.
Residual disinfection	the default requirement to use residual disinfection (e.g. chlorine) in a reticulated supply (or in any part of their supply that includes reticulation)	all other requirements are met and safe water can be supplied without the use of a network disinfectant (e.g. chlorine).

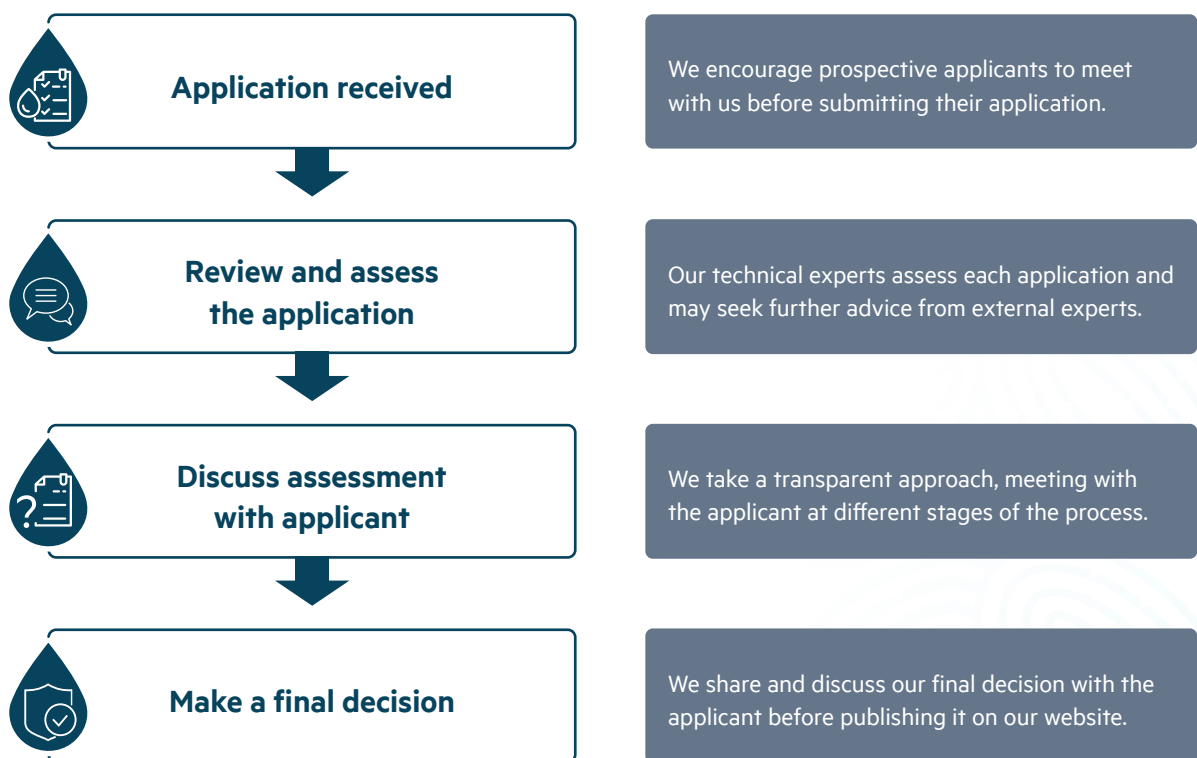
Developing the exemption process was a key aspect of the Authority’s early establishment phase, as exemptions were new for both us and the sector.

By managing exemptions carefully and with transparency, we ensure that public health remains protected while providing flexibility for suppliers facing exceptional circumstances.

At the time of publication, the ability to proactively issue exemptions is proposed to be introduced through the Local Government (Water Services) Bill, along with additional decision-making criteria that will influence how exemptions are assessed and granted.

Following these changes, our intent is to maintain a risk-based approach that is consistent with the approach outlined below.

Exemptions process



Appendix: Expectations for other groups that provide drinking water

Mixed-use rural water schemes

The Local Government (Water Services) Bill proposes changes to increase emphasis on the work the Authority is undertaking to support mixed-use rural water schemes.

We define a mixed-use rural supply as one that provides:

- at least 50% for farm use (e.g. for irrigation or stock)
- up to 50% for local people to use as drinking water.

The Authority has established a Mixed-use Rural Supplier and Consumer Advisory Group. Members are:

- supporting an improved understanding of the unique challenges and risks of these supplies
- providing insights into what guidance is needed by the rural community, as well as the best channels to engage with them.

At the time of publishing, we are also working to update the Acceptable Solution compliance option to help make it easier for these suppliers to meet their legal responsibilities while providing safe water to the people they serve.

Self-supplied schools

The Authority has identified self-supplied school supplies as a regulatory priority within this strategy. This is due to the additional vulnerabilities young children have when exposed to microbial contaminants, and high indicators of the presence of this risk within school supplies.

A sector plan will outline our regulatory expectations and approach to addressing these risks. The Authority will continue to work with the Ministry of Education and schools to implement this plan.

Very small supplies (serving under 25 people)

Under the Local Government (Water Services) Bill the regulatory framework is proposed to change to exclude some supplies serving 25 or fewer domestic household consumers from the regulatory regime.

The Authority has not set expectations for this group. However, we encourage everyone in New Zealand to take an active interest in understanding their drinking water. This includes:

- where it comes from
- who provides it
- the actions the provider is taking to ensure it is safe to drink.

The Authority will continue to make guidance and support available that will be useful for these providers.

The Authority will also continue to work with very small drinking water suppliers not excluded from requirements to ensure they have the necessary safety and resilience measures in place.

Unregistered drinking water supplies

Unregistered supplies have a duty to supply safe water, but have fewer other duties under the law compared to registered supplies.

We receive a notification when water at an unregistered supply is tested and exceeds the Standards. We will make practical guidance available to these suppliers to build their capability, in the first instance.

If a notification demonstrates a serious risk to public health from an unregistered supply, we may engage directly with the supplier and the National Public Health Service and use our tools to ensure that appropriate action is taken to protect public health.





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