



# Summary of submissions:

## Consultation on proposed changes to Acceptable Solutions

4 September 2025

From 1 May to 13 June 2025, the Water Services Authority – Taumata Arowai (the Authority) consulted on proposed changes to the current drinking water Acceptable Solutions, which were first introduced in 2022. These changes aim to make the Acceptable Solutions easier to understand and use and save suppliers and their communities time and cost, while providing safe drinking water to the people who drink it every day.

The proposed Acceptable Solutions set requirements for three common types of smaller drinking water supplies:

1. mixed-use rural supplies (where at least 50% of water supplied is for farm use (such as for irrigation or stock) and up to 50% is provided for people to drink)
2. small and medium-sized networked supplies
3. self-supplied buildings.

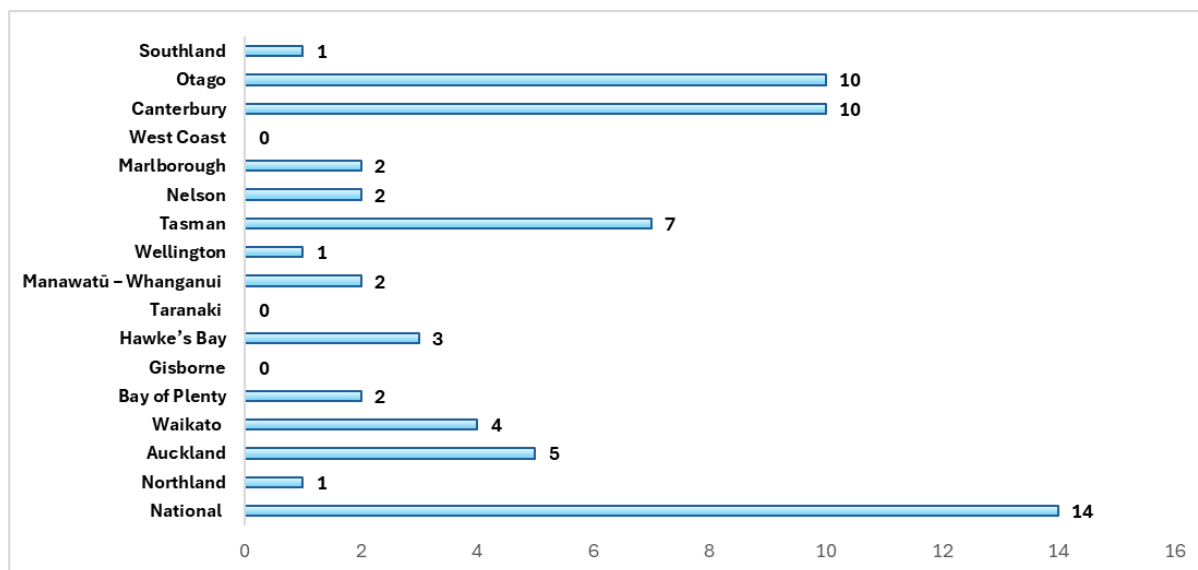
## Who provided submissions

We received 64 submissions on the proposed changes. Submitters represented a strong cross-section of New Zealand's drinking water sector, with 44 submissions received on behalf of organisations or groups and 20 received from individuals (including health and water professionals).

These included submissions from:

- three central government agencies
- three regional councils and unitary authorities
- eight territorial authorities
- one iwi-hapū group
- three schools
- 20 consumers, health and water professionals
- 17 community and private water suppliers
- six industry bodies
- six other organisations.

## Where submitters were located



## Response summary

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. Some respondents provided a written response in place of answering the individual questions.

Consultation question	Submission response		
	Yes	No	Don't know
<b>Making all the Acceptable Solutions based on supply type rather than some being based on source water type</b>			
Do you agree that the proposal for two new Acceptable Solutions will make it easier for water suppliers to identify what Acceptable Solution to comply with?	42	6	4
<b>Allowing end-point treatment systems that are not validated in some circumstances</b>			
Do you agree with the proposal to allow end-point UV disinfection systems that are not validated where 25 people or fewer are supplied and it is not a supply for a community purpose or public building?	39	10	2
Do you agree with the proposed situations where validated end-point UV disinfection systems will still be required?	34	13	2
Do you agree with the proposal to remove some end-point treatment system requirements that are in the current Acceptable Solutions?	34	11	5
Do you agree that the legacy clause is still required?	39	4	7
<b>Suppliers to provide information to consumers</b>			
Do you agree with the proposed requirements for suppliers to provide information to property owners and consumers on source water monitoring, annual testing and treatment advice, and (where necessary) what end-point treatment devices to install, maintain and test?	42	7	3
<b>Aligning the Acceptable Solution for Self-supplied Buildings with the Rules requirements:</b>			
Do you agree with the proposed increase to 10 buildings to be supplied from a single treatment system on the same property or in common ownership?	42	2	7
Do you agree with the proposed requirements that must be met for the increase to 10 buildings to be permitted including an increase in inspections of storage tanks to every three months?	32	9	10
<b>Changing the requirements for pre-requisite monitoring</b>			
Do you agree with the proposed changes to the pre-requisite monitoring?	30	9	7
<b>Specific performance criteria to address turbidity</b>			

Do you agree with the turbidity performance requirement?	29	10	11
Do you agree with the UV transmittance performance requirement?	24	9	14
<b>Proposal to remove certain monitoring requirements</b>			
Do you agree with the proposed changes to the monitoring requirements?	32	11	6
<b>Post-treatment monitoring</b>			
Do you agree with the proposed changes to the monitoring requirements?	36	11	6
Do you agree with the proposed post-treatment monitoring requirements for self-supplied buildings?	29	9	12
<b>Requirements when base population limits are exceeded</b>			
Do you agree with the proposed requirements when there is an exceedance of base population limits?	31	6	12
<b>Allowing for downstream supplies in the Acceptable Solution for Mixed-use Rural supplies</b>			
Do you agree with the proposal that end-point treatment is not required in a downstream supply which provides centralised treatment?	38	3	9
<b>Competency</b>			
Do you agree with the proposal to include competency requirements?	32	12	8

## Key themes from submissions

### General themes from submitters

#### Overall

There was broad support for the changes proposed to the Acceptable Solutions, with approximately 80% of submitters endorsing the proposed changes.

The proposed changes were seen to strike an appropriate balance between cost, flexibility and safety, with potential benefits for rural communities, marae, and papakāinga kāinga nohoanga.

#### New Acceptable Solutions

The proposed introduction of two new Acceptable Solutions for small and medium networked supplies and self-supplied buildings was welcomed as a practical step forward by those supporting, particularly for small and rural suppliers.

## **Guidance**

Submitters highlighted the importance of simple and clear technical terms and definitions. Many supported the emphasis on rural and self-supplied systems and highlighted the need for clear, accessible, practical, plain language guidance on how Acceptable Solutions should be implemented.

Submitters suggested guidance should cover roles, responsibilities and maintenance, particularly around:

- technical thresholds (e.g. turbidity, UV transmittance (UVT))
- post-treatment responsibilities
- cyanobacteria risk
- mixed-use supplies or self-supplies.

There was a request for collaboration with industry and training providers to ensure a well-informed, capable supplier base.

## **End-point treatment systems**

The proposal to allow non-validated end-point ultraviolet (UV) treatment systems for supplies serving fewer than 25 people per connection was largely supported. Providing some supplies with a more cost-effective treatment option was seen as a pragmatic, risk-based approach that supports public health.

Some submitters expressed conditional support for the use of unvalidated UV systems in low-risk situations and raised significant concerns regarding the feasibility of compliance. In this regard, they highlighted the need for clear guidance that:

- distinguishes between requirements and advice
- defines supplier versus property owner responsibilities (particularly for small or volunteer-led schemes)
- addresses operational challenges, user resistance and how to manage bacterial exceedances.

## **Downstream supplies**

There was strong support for not requiring end-point treatment in a downstream supply where a connected supply has centralised treatment in place. Submitters considered this would strengthen the Acceptable Solutions and improve compliance for these supply types.

## **Monitoring**

Views on proposed changes to monitoring requirements were mixed.

Some respondents advocated for further reductions in requirements for self-supplied buildings, with approximately 15–20% also opposing the proposed increase in inspection frequency (e.g. quarterly tank inspections).

Other submitters called for stronger safeguards for surface water sources and a greater emphasis on performance-based compliance.

A further 23% of submitters expressed uncertainty about the post-treatment monitoring requirements.

## **Themes from central government agencies**

Central government agencies largely supported the proposed direction, including streamlined compliance pathways and increasing the number of buildings per end-point treatment system.

They endorsed the use of non-validated UV systems for small supplies and supported simplification for multiple buildings on a single property.

However, these agencies emphasised the importance of retaining safety mechanisms such as shut-off systems when UV performance is compromised. They also expressed concerns that small and medium suppliers may lack the capability to meet new monitoring and maintenance responsibilities.

These agencies requested clear guidance on performance expectations, compliance pathways and definitions. Further support was sought for suppliers, particularly in applying safety measures and source water monitoring.

## **Themes from regional councils and unitary and territorial authorities**

Local authorities were broadly supportive of the proposed changes to Acceptable Solutions, especially for small schemes.

The proposal to allow end-point UV disinfection systems that are not validated where 25 people or fewer are connected was seen as enhancing affordability without compromising drinking water safety.

Many territorial authorities supported the exemption of downstream end-point treatment where centralised systems are in place, considering this a practical step to avoid redundant infrastructure.

Key concerns included the capability and willingness of small suppliers to invest in drinking water treatment and distribution.

Regional and territorial authorities requested clearer guidance on roles and responsibilities for both suppliers and property owners, as well as more support for rural suppliers. Specific areas of interest included selective abstraction of surface water, source monitoring, turbidity thresholds and clarity on rural piped networks. Some requested a warning system for UV issues in end-point systems.

## **Themes from iwi and hapū**

Iwi and hapū generally supported the proposals, particularly the inclusion of unvalidated end-point treatment systems for connections that serve under 25 people and standardisation for marae and papakāinga. However, concerns were raised around equity and resourcing.

Requests were focused on education, training and guidance to support small rural Māori suppliers. Clarification of roles and responsibilities between property owners and suppliers was seen as essential.

## **Themes from water professionals and industry bodies**

The majority of water professionals and industry representatives supported the new Acceptable Solutions and the move to structure them by supply type, citing improved clarity and alignment. There was strong support for the proposed Acceptable Solution for self-supplied buildings and for shared treatment systems for up to 10 buildings under one ownership.

Concerns focused on the removal of validation requirements for UV systems and the associated safety risks. Many opposed the removal of alternative UV validation options for large buildings and called for stricter safeguards for untreated surface water.

There was divided opinion on monitoring. Some supported population-based increases, while others rejected increased inspection requirements as burdensome. Some submitters advocated for limits to apply only during sustained population surges.

### **Themes from schools**

Schools welcomed the proposals as cost-effective measures that maintain public health protection. They particularly supported allowing a single system to serve up to 10 buildings and agree that monthly testing of drinking water is essential to ensure the health and wellbeing of their tamariki.

However, there was widespread concern about staff competency to manage drinking water systems. Submitters called for Ministry of Education support through trained personnel or tailored training for school staff. While the changes were seen as beneficial for rural, non-reticulated schools, they highlighted a critical need for clear guidance, structural support and role clarity.

### **Themes from community and small private supplies**

Small suppliers and rural water schemes broadly considered the proposals to be a practical and proportionate response to their operational realities, particularly valuing the flexibility to tailor treatment systems to individual risk profiles and an alternative option to avoid using often more costly centralised treatment systems. Submitters called for clearer differentiation between pressurised and trickle-fed schemes and cautioned against requirements – such as shut-off valves for UV system – that could create unnecessary cost barriers.

Several suppliers advocated for greater flexibility in system design, including the removal of building limits or the adoption of hybrid models, arguing that water quality at the point of use should be the key compliance measure. While some raised concerns around training and operational capability, most regarded the proposed framework as a balanced and workable approach for small-scale suppliers.

## **Follow-up on end-point treatment system proposal**

While analysing submissions, we identified that some submitters may have interpreted one consultation question differently than others.

We contacted all 64 submitters to clarify the question and provide them the opportunity to send us revised feedback. The question related to the proposal to permit the use of end-point treatment systems that are not validated where:

- 25 or fewer people are supplied water per connection
- the supply does not provide drinking water to a community purpose or public building.

Nine submitters responded. All reaffirmed their initial positions, which indicated they had already understood the proposal as explained in the consultation document.

### **Next steps**

The Authority has considered all submissions and will take them into account when refining the proposed changes to the Acceptable Solutions and preparing associated guidance material.





Water Services Authority  
Taumata Arowai