



Summary of submissions: Proposed changes to Drinking Water Quality Assurance Rules for supplies that serve 501 or greater people

Introduction

The Water Services Authority – Taumata Arowai (the Authority) has reviewed the Drinking Water Quality Assurance Rules (**the Rules**) for supplies that serve 501 or more people. During a six-week public consultation in November and December 2025, we received 79 submissions on the proposed changes to the Rules.

Below is a summary of key themes we received from the feedback, followed by the number of responses to each consultation question in table format.

Key themes from feedback

Note – percentages are calculated from the question responses in the tables outlined further below.

Rules reporting timeframe

Most submitters supported the proposal to change the current Rules reporting year to a financial year (89%), commenting that aligning Rules reporting with councils' other reporting requirements will likely reduce resourcing pressures for councils.

Most councils support the new Rules reporting taking effect from 1 July 2027 (86%), although some councils requested a longer implementation timeframe.

There was mixed feedback on the proposed change from small non-council supplies and central government supplies.

Rules for supplies serving 501 or more people

General themes

Overall, there was support for the proposed changes to the Rules for large supplies. Most submitters (73%) agreed that the proposed changes would make it easier to follow the Rules.

Submitters had concerns that some of the proposed changes would result in significant additional costs for suppliers. Examples included continually monitoring pressure in distribution zones, the use of suitably qualified and experienced persons and setting up new Rules reporting systems.

A significant number of submitters (48%) did not agree with our assessment of the cost implications of the proposed Rules changes.

There were requests from submitters for detailed guidance on many of the proposed Rule changes. Examples included guidance on new cyanobacteria and cyanotoxin rules and what constitutes a suitably qualified and experienced person.



Technical themes

Submitters supported proposed changes to:

- make all continuous monitoring rules be reported every month (88%)
- require non-compliance reporting for non-compliance with continuous monitoring rules (76%)
- expand source water classes so that they apply to source water monitoring, bacteria and virus rules as well as protozoa rules (82%)
- Class B, Class C and Class D source water criteria (74%, 86% and 93%)
- require continuous monitoring for conductivity, pH and turbidity for all source water classes (76%)
- require suppliers to demonstrate that chemicals dosed into drinking water are safe to use and prepare a schedule of chemicals used in treatment (69%).

There were specific issues raised regarding the proposed requirements for Class A source water, including the proposed health outcome target, proposed enteric viral monitoring requirements and not requiring primary chlorine treatment.

Some submitters:

- had concerns that no longer allowing representative sampling for Class C ground water sources would have cost impacts for their supplies
- requested that chlorine dioxide be retained as an option for bacteria and virus treatment as it is currently being used by some supplies
- were concerned regarding cost increases if chlorate testing was increased from monthly to weekly
- had concerns that removing some of the existing protozoa treatment process options would reduce treatment flexibility.

Submitters supported the change from requiring suppliers to prepare a cyanobacteria/cyanotoxin response plan to prescribing monitoring (63%). Some submitters raised concerns regarding proposed thresholds for cyanobacteria and cyanotoxin monitoring and requested that these rules be reviewed. Some submitters also commented that there was a lack of capability in this specialist area to give meaningful feedback.

Submitters supported the proposal to require continuous monitoring of pressure in distribution zones (62%). Submitters commented that the proposed rules may need further technical review, and that monitoring would require significant investment for suppliers who do not have the current infrastructure in place to monitor pressure. Several submitters requested that pressure monitoring requirements be phased in due to costs and complexity in implementing.

Most submitters (70%) did not agree with the proposal that continuous monitoring of chlorine should be required for all distribution zones.

Summary of information about the submitters

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

Table 1: Of the 79 submissions received, 67 were on behalf of an organisation or group and 12 were submitted by individuals.

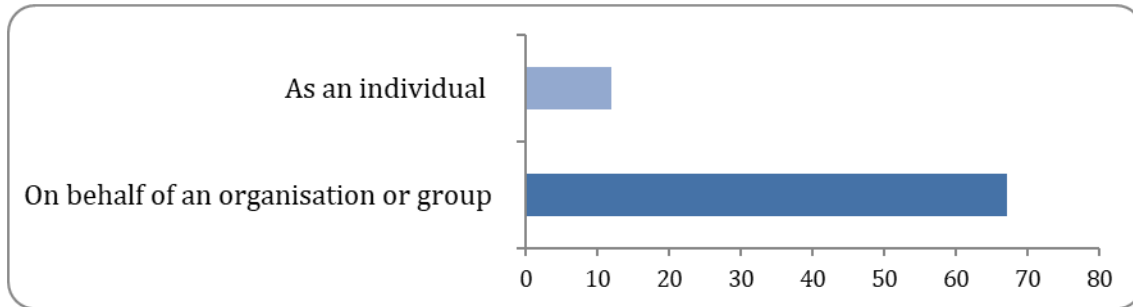


Table 2: Of submissions received, we received responses from 16 regions.

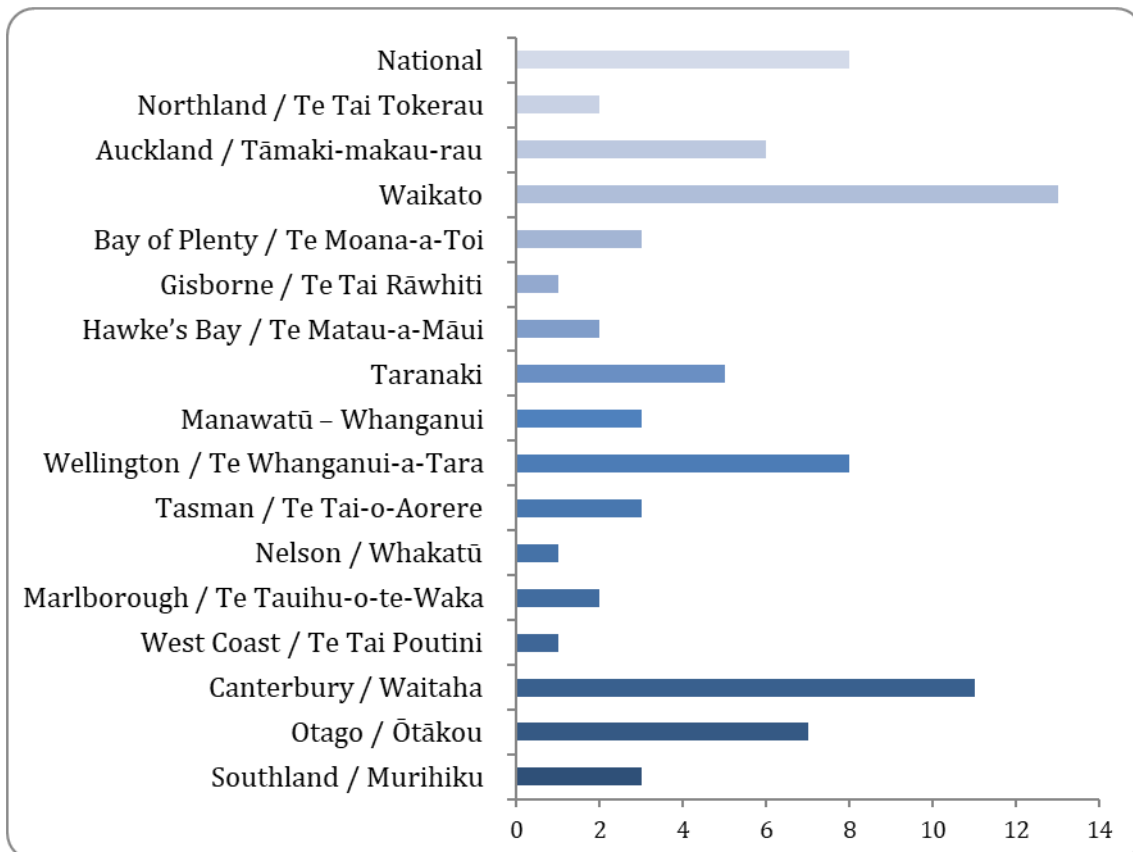
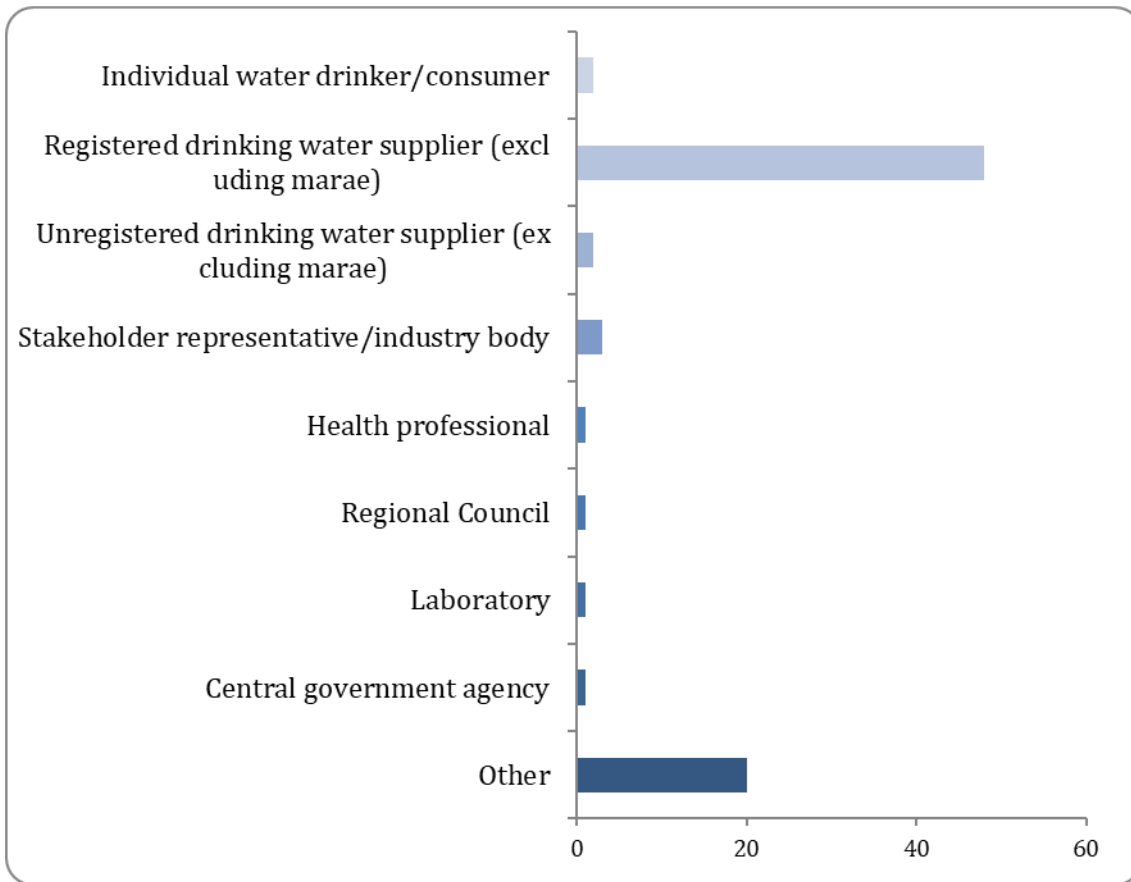




Table 3: Most responses were from submitters who identified themselves as a ‘registered drinking water supplier (excluding marae)’ (48 submissions). The ‘other’ category was the next largest (20 submissions). The remaining submitters were fairly evenly spread across the remaining categories.



Summary of responses to consultation questions

The tables below summarise the responses received for specific questions (yes, no, don't know) asked in the consultation. Not all questions are included.

This table does not summarise individual comments on questions. Not all respondents answered every question. Some respondents engaged through written feedback or additional material, without explicitly stating whether they agreed or disagreed with the questions.

Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Change to reporting year			
Do you agree with the proposal to change the current Rules reporting year, currently January to December (calendar year), to July to June (financial year)?	56	6	1
Do you agree that if a change to financial year reporting is introduced, revised Rules reporting year should apply from 1 July 2027?	48	7	1
Are there any implementation issues or impacts associated with changing to a financial year that you would like to provide feedback on?	30	23	2
Level 3 Source water classes			
Do you agree with expanding source water classes so that they apply to source water monitoring, bacteria and virus rules as well as protozoa rules?	36	4	4
Class A and Class A Interim source water			
Do you agree with the proposal that Class A source water will not require primary treatment for bacteria, viruses or protozoa (though they will still need to add chlorine to provide a residual)?	26	7	3
Do you agree with the proposed requirement for an enteric viral monitoring programme to demonstrate a health-outcome target for viral risk can be met?	20	9	7



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the proposed health-outcome target of one enteric viral infection/10,000 people/year?	18	4	15
Do you agree with the proposed requirement that an independent suitably qualified and experienced person must prepare a written report demonstrating that the health-outcome target can be achieved and maintained for the supply?	24	7	7
Do you agree with the proposed criteria included in Class A (Interim) to establish Class A source water?	18	9	4
Do you agree with the 24-month timeframe for establishing Class A source water?	27	0	3
<i>Class B and Class B (Interim) source water</i>			
Do you agree with the proposed criteria for demonstrating Class B source water?	23	6	2
Do you agree with the proposed criteria included in Class B (Interim) for establishing Class B source water?	21	2	4
Do you agree with the 24-month timeframe for establishing Class B source water?	25	0	3
<i>Source water contamination assessments</i>			
Do you agree with the proposed assessments for Class A, Class A (Interim), Class B and Class B (Interim) source water if any monitoring result indicates potential contamination or the groundwater source has been compromised?	27	4	1
<i>Class C Source water</i>			
Do you agree with the criteria for Class C source water?	36	5	1
Do you agree that an assessment to reclassify a Class D source water to Class C should only be undertaken by a suitably qualified and experienced person?	39	3	2
<i>Class D Source water</i>			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the criteria for Class D source water?	41	1	2
General rules module			
<i>G.RR.4</i>			
Do you agree (for all applicable rules) with the change to make all continuous monitoring rules reported on a monthly basis?	43	4	2
Do you agree with non-compliance reporting for non-compliance with continuous monitoring rules?	34	8	3
Are there any cost implications for you from this proposed change?	37	0	6
<i>G.RR.5</i>			
Do you agree with including a rule that sets out the requirements specific to grab sampling for monitoring rules?	46	0	3
Do you agree with changing some reporting that is currently annual into monthly reporting?	34	4	5
<i>G.CM.3</i>			
Do you agree with the 24-hour grab sample time proposed to account for the missing source water or distribution zone continuous monitoring data with a limit of up to 48 hours?	27	12	7
<i>G.CM.4</i>			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the 60-minute grab sample time proposed to account for missing treatment continuous monitoring data?	32	7	6
Level 3 Source water monitoring rules module			
<i>S3.CR.1</i>			
Do you agree that an assessment to classify a source water class should only be undertaken by a suitably qualified and experienced person?	34	11	5
Would there be any cost implications for your organisation?	29	4	5
<i>S3.AB.1</i>			
Do you agree that an assessment to demonstrate a sanitary bore head should only be undertaken by a suitably qualified and experienced person?	20	4	6
Would there be any cost implications for your organisation?	20	4	5
<i>S3.AB.2</i>			
Do you agree with only allowing representative sampling for Class A, Class A (Interim), Class B and Class B (Interim) source water?	20	6	5
Do you agree with the proposal to remove the six bore limit for representative sampling?	22	5	8
<i>S3.AB.4</i>			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the frequency for testing for a viral indicator being determined by the supplier's enteric viral monitoring programme?	16	8	10
<i>S3.AB.5</i>			
Do you agree with the removal of the requirement to monitor for colour for Class A, Class A (Interim), Class B and Class B (Interim) source water?	30	0	6
<i>S3.AB.6</i>			
Do you agree with requiring continuous monitoring for conductivity, pH and turbidity for Class A, Class A (Interim), Class B and Class B (Interim) source waters?	25	6	2
Would there be any cost implications for your organisation?	12	7	1
<i>S3.AB.7 and S3.CD.4</i>			
Do you agree with the proposed addition of boron, fluoride and hardness?	37	5	2
Do you agree with the proposed removal of barium, calcium and magnesium?	35	3	5
<i>S3.AB.9</i>			
Do you agree that testing for radiological determinands should only be required for Class A, Class A (Interim), Class B and Class B (Interim) source waters?	25	9	6
<i>S3.CD.6</i>			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the change to an assessment of the likelihood of the presence of cyanobacteria in source water and moving the assessment of cyanobacteria risk to the source water risk management plan?	35	5	4
Do you agree that the likelihood assessment should only be undertaken by a suitably qualified and experienced person?	36	9	2
<i>S3.CD.7 and S3.CD.8</i>			
Do you agree with the change from requiring suppliers to prepare a cyanobacteria/cyanotoxin response plan to prescribing monitoring?	29	14	3
Do you agree with the requirements to monitor cyanobacteria biovolume when source waters have a medium or high likelihood of planktonic or benthic cyanobacteria being present?	28	13	4
Do you agree that suppliers do not need to undertake monitoring of source water for planktonic or benthic cyanobacteria if they have a cyanotoxin removal process as part of their treatment?	22	17	4
<i>S3.CD.9</i>			
Do you agree with the cyanobacteria biovolume threshold prescribed for initiating the commencement of cyanotoxin monitoring in treated water?	23	8	15
<i>S3.5 (existing rule) - remove</i>			
Do you agree with the proposed removal of additional event-based monitoring of Class C and D source waters from the Rules?	44	4	2
<i>Footnotes 33, 36 and 40 (existing footnotes)</i>			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the proposed removal of footnotes on the collection of samples from the Rules?	40	2	7
Level 3 Treatment rules module			
<i>T3.BV.C2</i>			
Do you agree with removing chlorine dioxide as an option for bacteria and virus treatment?	16	10	0
Do you agree with removing the requirement for Self-supplied buildings providing water to more than one building to use chlorine?	21	7	3
<i>T3.PZ.C3</i>			
Do you agree with removing the coagulation, flocculation and sedimentation process without filtration process option?	17	3	6
Do you agree with removing the current coagulation, flocculation and direct filtration process option for achieving 3 log and 3.5 log credits?	11	10	5
Do you agree with removing the reference to flocculation in the current coagulation, flocculation and direct filtration process?	16	5	5
Are you using coagulation and direct filtration to achieve 3 log or 3.5 log credits?	8	20	1



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with removing the second stage filtration process option?	12	11	6
Do you agree with removing the slow sand filtration process option?	15	12	4
Will removing these options create any challenges for your organisation?	9	17	3
T3.PZ.C5			
Do you agree with the proposed changes for managing recycled water at treatment plants?	24	6	5
T3.PZ.C6			
Do you agree with the inclusion of this rule about the turbidity of filtered water?	23	9	5
T3.PZ.X4			
Do you agree with the removal of the option to use AS/NZS 4348:1995 in conjunction with AS/NZS 3497:1998 (updated 2001)?	9	4	14
Chemical monitoring rules			
T3.CH.1			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with requirements for suppliers to demonstrate that chemicals dosed into drinking water are safe for use?	34	11	4
Will meeting the requirements of this proposed rule create challenges for your organisation?	22	10	7
<i>T3.CH.2</i>			
Do you agree with this proposed rule requiring preparation of a schedule of chemicals used in treatment?	41	4	1
<i>T3.CH.3</i>			
Do you agree with the increase in monitoring frequency to monthly for chemicals that were previously determined to have standard values?	30	13	4
<i>T3.96 (existing rule) - remove</i>			
Do you agree that the requirement for event-based monitoring should be removed from the Rules and managed by the supplier on a case-by-case basis?	44	1	1



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
<i>Cyanotoxin monitoring rules</i>			
<i>T3.CY.1</i>			
Do you agree with this proposed rule on when cyanotoxin monitoring must be undertaken in treated water?	26	10	6
<i>T3.CY.2</i>			
Do you agree with this proposed change to the sampling frequency of cyanotoxins?	27	7	8
Level 3 Distribution rules module			
<i>D3.PM.1</i>			
Do you agree with the proposal to require continuous monitoring of pressure in distribution zones?	34	15	5
Do you agree with the requirements of the proposed rule?	30	14	3
Do you currently have pressure monitoring in place in any of your distribution zones?	31	9	1
Are there any cost implications for you of this proposed change?	32	2	0
<i>D3.PM.2</i>			



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the proposed pressure limits in distribution zones?	25	15	6
D3.RD.1			
Do you agree with the proposed rule on monitoring Free Available Chlorine (FAC) in a distribution zone?	35	12	3
Do you agree with meeting compliance requirements by using either continuous or grab sampling options?	40	7	2
Do you agree that continuous monitoring of FAC should be required for all distribution zones?	10	33	4
Seeking feedback on other matters			
Do you agree with the proposed changes to the definitions in the interpretation rules?	27	9	6
Do you agree with our assessment of the cost implications of the proposed Rules changes?	16	19	5
Do the proposed changes make it easier to follow the Rules?	30	5	6



Consultation question	Submission responses (total numbers)		
	Yes	No	Don't know
Do you agree with the revised Rules numbering system?	24	10	7