

Summary of submissions on Drinking Water Aesthetic Values

On 17 January 2022 Taumata Arowai commenced a 10-week public consultation process on proposed **Drinking Water Aesthetic Values** (the Aesthetic Values) and other regulatory instruments. The consultation process was a mix of direct engagement and public notices, supported by webinars.

There were 36 submissions to the consultation from a diverse range of interests in the Aesthetic Values. The following three tables reflect what interest the submitters have in the Aesthetic Values and geographically where the submissions have come from.

Table 1:

Of the 36 submissions received, 30 were on behalf of an organisation or group, 6 were submitted by individuals.

Table 2:

Of the 36 submissions received, 5 identified as a national response, 12 responses identified as a region (NOTE: we did not receive responses from the following 4 regions Gisborne/Te Tai Rāwhiti, Hawke's Bay / Te Matau-aMāui, Wellington/Te Whanga-nui-aTara and West Coast/Te Tai Poutini).

Table 3:

Most responses received were from individuals, organisations or groups that identified themselves as Local Authority or Council Controlled (19), Individual Water Drinker/Consumer (12), and Registered Water Supplier (10).

Table 1

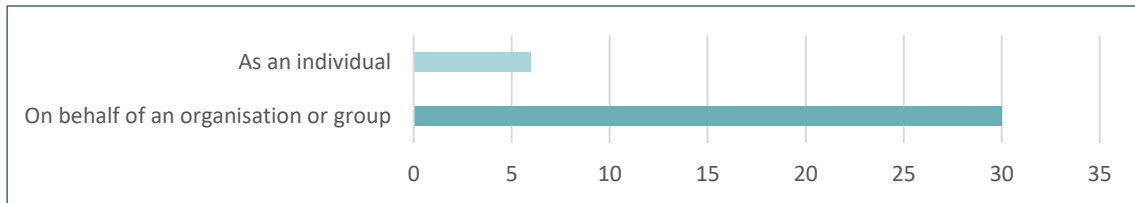


Table 2

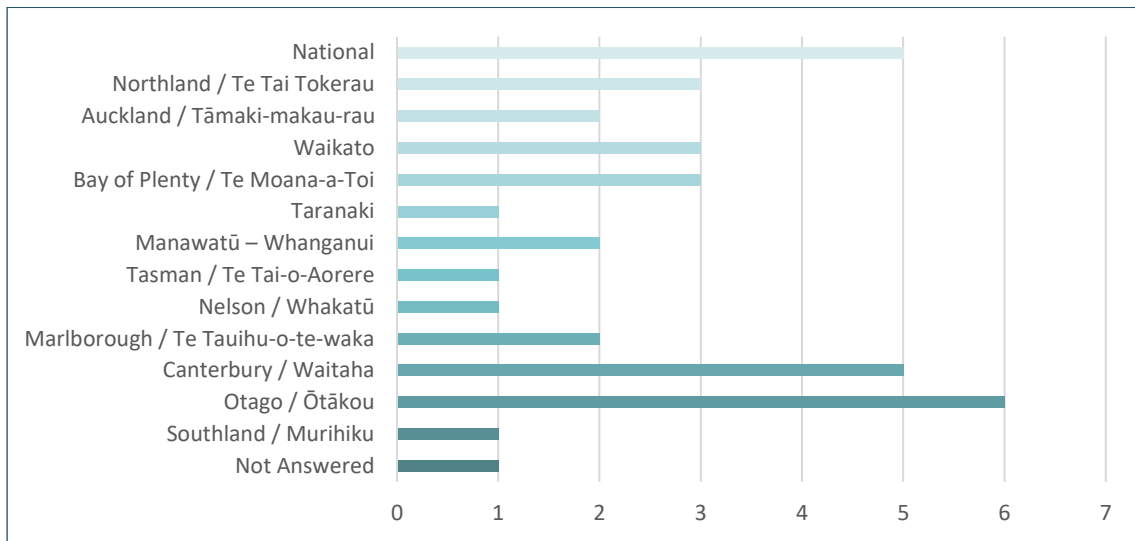
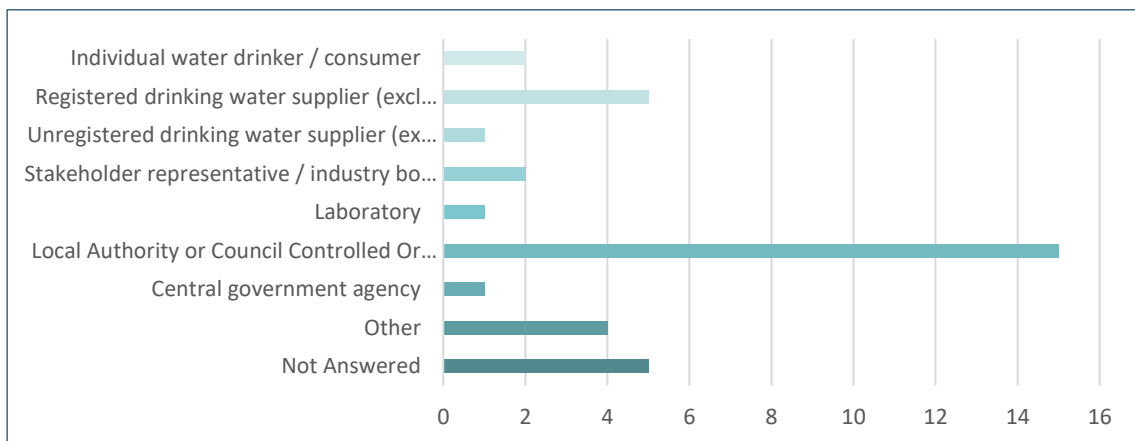


Table 3



Below is a summary of the responses received to the questions the consultation asked. Note not all respondents answered all questions.

Survey Question	Submission Response		
	Yes	No	Don't know
Do you agree that the acceptable range of determinands proposed will be acceptable to consumers regarding appearance, taste or odour?	10	3	3
Do you agree with the proposed acceptable range for Chlorine?	1	9	0
Do you agree with the proposed acceptable range for Iron?	9	0	0
Do you agree with the proposed acceptable range for Temperature?	7	2	0
Do you agree with the proposed acceptable range for Turbidity?	5	1	1
Do you agree with the proposed acceptable range for Colour?	7	0	1

The issues raised in relation to the proposed acceptable range for Chlorine are:

- Chlorine should be a \leq value rather than a range. It would be very surprising to receive a complaint for the lack of Chlorine present in drinking water. A minimum value for Chlorine makes the 'Aesthetic' Value of Chlorine bias towards the disinfection requirement.
- The proposed aesthetic standard at the tap creates a difficult balancing act between maintaining minimum residual Chlorine across the network but having to keep below the aesthetic values at every customer tap. To comply will incur significant additional capital and ongoing operational costs and health and safety requirements for booster sites throughout the reticulation. The practicality of this standard needs to be considered.
- The transition period to achieve the Chlorine guideline range of 0.3. to 0.6 is unrealistic. Drinking Water Supplies that have large, branched reticulation networks will require installation of chlorine booster plants, possibly at a number of locations within a network in order to consistently achieve this very narrow acceptable chlorine range.
- The Aesthetic Value for Chlorine could benefit from additional clarity by ensuring disinfection is not compromised.
- This limit may be easily achievable with large supplies but may be more difficult to achieve this level of control when very small quantities [of Chlorine] are required. As our water is currently unchlorinated, I have no experience with the level of control achievable with very small dosing systems, however on a couple of occasions that I have seen tanks manually dosed with Chlorine the results in the reticulation system have been variable.

The following additional issues were raised by submitters:

- The requirements for implementation should be aligned with the 3 Waters reform to manage the increased costs to consumers.
- Consumers on small water schemes should be able to judge for themselves whether they want to use water with colour or smell issues and can talk to their supplier about it without needing regulation from the Government placing costs and liabilities on the supplier that neither the consumer nor the supplier want to pay or bear.
- We disagree with the inclusion of this duty [aesthetic values] in the Act. Noting however that Taumata Arowai have an obligation to set a standard, we recommend that Taumata Arowai instead allows the suppliers to rely more on the particulars of their consumer group. A 'reasonable consumer' should not be determined on the basis of all consumers in New Zealand. As we know, rural and urban consumers have different expectations based on their knowledge of the water.
- What will be the ruling be if an aesthetic value is consistently exceeded, can this not take into consideration whether or not there are consumer complaints.
- It is noted that the Water Services Act introduces a requirement for suppliers to take all reasonably practicable steps to supply drinking that complies with the aesthetic values. Guidance on what this means in practical terms for water suppliers will be important because compliance may require significant alterations to treatment plants and/or supply operation.
- It would be useful to provide information on if/when parameters in the aesthetic values become toxic. This could be provided through a link to the World Health Organisation information or provided as a separate resource.

Next steps

Our next step is to provide advice to the senior leadership team at Taumata Arowai and to ask for a decision, under delegated authority, to issue final Aesthetic Values, followed by the publication of the final document.