

25 March 2022

Via Email: [korero@taumataarowai.govt.nz](mailto:korero@taumataarowai.govt.nz)

Dear Sir / Madam,

**SUBMISSION TO TAUMATA AROWAI ON THE SUITE OF DRINKING WATER QUALITY ASSURANCE DOCUMENTS**

Thank you for providing the Queenstown Lakes District Council (QLDC) with the opportunity to submit on the following documents:


- Drinking Water Standards
- Drinking Water Quality Assurance Rules
- Drinking Water Aesthetic Values
- Drinking Water Acceptable Solution for Roof Water Supplies
- Drinking Water Acceptable Solution for Spring and Bore Water Supplies
- Drinking Water Acceptable Solution for Rural Agricultural Water Supplies
- Drinking Water Network Environmental Performance Measures

QLDC strongly supports the need for safe drinking water. Providing clear performance and reporting standards are crucial to achieve this outcome. The suite of documents published for consultation are a step in the right direction and we look forward to working with Taumata Arowai to ensure our communities can have confidence in their drinking water.

Please find enclosed a small number of comments on the consultation documents for consideration by Taumata Arowai. QLDC does not need to be heard at any hearings that result from this consultation process.

Please note that this submission reflects the position of officers and has not been ratified by full Council.

Yours sincerely,



Peter Hansby  
**General Manager – Property and Infrastructure**

## **1. BACKGROUND**

Queenstown Lakes District Council (QLDC) provides drinking water to our communities through eleven water supply schemes. Water is sourced from a variety of high quality lake and ground water sources, treated in one of our fourteen treatment plants, and reticulated to our customers through a piped network of more than 700 kilometres.

QLDC has extensive investment planned in the current ten year plan to ensure that the safe drinking water can be provided to our communities now and into the future. QLDC acknowledge that a number of our water supplies do not provide a protozoa barrier as required by both the current Drinking Water Standards and the proposed Quality Assurance Rules, and reiterate our commitment to achieving full compliance as quickly as possible through our planned investment interventions.

## **2. SUBMISSION TO TAUMATA AROWAI ON THE PROPOSED DRINKING WATER STANDARDS**

The Queenstown Lakes District Council (QLDC) supports the Maximum Acceptable Values (MAV) proposed in the Drinking Water Standards.

The standards state that 'All consumers on a supply should receive water that meets these standards; therefore the standards must be met at all points in a water system after treatment'. QLDC supports this statement, but believes it should be acknowledged that the water supplier cannot influence the quality of the water downstream of the point of supply (the point where the pipework becomes the responsibility of the property owner or occupier). Accordingly, all quality testing for the purpose of demonstrating compliance should be completed on the supplier's network, not from within customers' taps.

## **3. SUBMISSION TO TAUMATA AROWAI ON THE PROPOSED QUALITY ASSURANCE RULES**

In general QLDC supports the Quality Assurance Rules proposed, however, there are a small number of technical aspects of the rules and their implications that QLDC would like to bring to the attention of Taumata Arowai:

- 2.1 Section 3.1 – assumed typo ' Source Water 2Rules'
- 2.2 Section 10.8.3, S3.4 - sets out a requirement to undertake additional monitoring during severe or extreme weather events and immediately after the event finishes, but does not provide any guidance around what the expectations of this 'additional monitoring' are. This is too vague and should either be removed (to be covered in the water safety plan) or the expectations explicitly stated.
- 2.3 Section 10.8.3, S3.6 - guidance should be provided to help ensure consistent classification of cyanobacteria risk across water suppliers.
- 2.4 Section 10.8.3, Table 15 - the continuous measurement of conductivity will require the installation of new instrumentation at all of the district's supplies. QLDC request that Taumata Arowai consider a transitional period of at least six months from the rules being finalised, to allow water suppliers to prepare themselves for any new requirements included in the rules.
- 2.5 Section 10.9.1, Table 19 - the continuous measurement of ultraviolet transmittance (UVT) will require the installation of new instrumentation at some treatment plants. QLDC request that Taumata Arowai consider a transitional period of at least six months from the rules being

finalised, to allow water suppliers to prepare themselves for any new requirements included in the rules.

- 2.6 Section 10.10.1, D3.3 - the Water Supplier has authority under the Water Services Act to require rectification of a private backflow issue without involvement of the Local Authority. This clause should be updated to remove reference to the Local Authority.

### **3. SUBMISSION TO TAUMATA AROWAI ON THE PROPOSED DRINKING WATER AESTHETIC VALUES**

In general QLDC supports the proposed drinking water aesthetic values, however, the proposed acceptable band for Chlorine (0.3 to 0.6mg/l) is not practically achievable. Please note 0.3 mg/l is below the current critical control point for Chlorine adopted within the district (0.4 mg/l), and operating within the proposed range would dramatically increase the risk of having insufficient residual in the water supply. QLDC requests that the current aesthetic range for chlorine is retained.

### **4. SUBMISSION TO TAUMATA AROWAI ON THE PROPOSED DRINKING WATER ACCEPTABLE SOLUTIONS**

QLDC supports the concept of Acceptable Solutions and has no comments on the consultation documents.

### **5. SUBMISSION TO TAUMATA AROWAI ON THE PROPOSED DRINKING WATER NETWORK ENVIRONMENTAL PERFORMANCE MEASURES**

QLDC is comfortable with the performance measures that it is being asked to report on through the consultation document. However, it is important to note that for some measures it will only be possible, at least in the short term, to provide estimates of performance, or results with lower confidence levels due to the nature of how data is currently collected. Following the requirements for network performance reporting being finalised QLDC will be able to make adjustments to internal processes and systems to ensure the data can be collected so as to generate higher accuracy results in the future. QLDC request that the Taumata Arowai allow some leniency around data quality and completeness for the 2022 reporting year.