

19 December 2025

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## SUBMISSION TO TAUMATA AROWAI ON DRINKING WATER QUALITY ASSURANCE RULES FOR SUPPLIES SERVING 501 OR MORE PEOPLE

Thank you for the opportunity to present this submission on the Drinking Water Quality Assurance Rules for supplies serving 501 or more people. The Queenstown Lakes District Council (QLDC) appreciates the opportunity to submit and makes the following comments and recommendations associated with the proposed changes to ensure they best achieve the intended outcomes:

- **Cost of updating reporting platforms for rule changes** – QLDC wishes to highlight the significant costs that a change in rules has for Water Suppliers. These changes require Water Suppliers to update their reporting tool/platform (in our case Infrastructure Data), the proposed changes are expected to cost approximately \$50k to be implemented. This would be an unbudgeted expense and challenging to accommodate due to the short timeframe to incorporate into budgetary planning cycles. QLDC recommends that Taumata Arowai works with the major providers of the reporting platforms (Water Outlook & Infrastructure Data) and supports them to minimise the costs and impacts to water suppliers (including consideration of financial contributions).
- **Costs of implementing new pressure monitoring rules** - The proposed Pressure Monitoring Rule (D3.PM.1), will also represent a significant financial cost to council that is currently unplanned and unbudgeted. QLDC recommends that the implementation timelines for the proposed Pressure Monitoring Rule are extended to 1 January 2029 to allow time to obtain funding and coordinate delivery.
- **Reporting and cost requirements of the proposed Bacteria and virus treatment common rules** - The proposed requirement to continuously monitor and report on FAC, FACe and pH at the treatment plant, regardless of treatment relied on for compliance, introduces additional costs and complexity with little demonstrable value. QLDC understands that chlorination is a requirement and monitors levels in the distribution zones. QLDC recommends that proposed rule (T3.BV.C) would better achieve the intended outcomes, if it only applies to suppliers currently using the T3.1, T3.2 and T3.3 rules. QLDC has chosen to use ultraviolet light (UV) to report bacterial compliance for most treatment plants in the district for efficiency.
- **UV Compliance** – The current rules are ambiguous regarding how multiple UV reactors should be considered when calculating compliance. QLDC recommends that UV compliance rules for protozoa (T3.PZ.U4), and UV compliance rules for bacterial and virus (T3.BV.U4), are based on the overall production volume of the treatment plant as a whole (e.g. all reactors) and that this is more clearly reflected in the rules. QLDC notes this is the current, agreed approach QLDC has with Taumata Arowai for treatment plants in the district.

QLDC would not like to be heard at any hearings that result from this consultation process. Thank you again for the opportunity to comment.

Yours sincerely,



Tony Avery  
GM Property and Infrastructure