19 December 2025

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To whom it may concern

Submission on Proposed Drinking Water Quality Assurance Rules

Palmerston North City Council (PNCC), Rangitikei District Council (RDC) and Horowhenua District Council (HDC) welcomes the opportunity to provide feedback on the proposed Drinking Water Quality Assurance Rules (DWQAR) large supply source water rules changes.

PNCC, RDC and HDC are working together in the formation of the new Water Services CCO called Central District Water and have created a joint submission across the three Councils.

The three Councils support the intent of the Rules — to strengthen national consistency, improve source-water risk characterisation, and modernise monitoring requirements.

This submission outlines key areas where clarification, guidance, or refinement would ensure practical implementation, operational efficiency, and equitable compliance expectations for suppliers of varying scale.

General Comments

The three Councils recognise the significant work undertaken by Taumata Arowai in developing the proposed Rules. The realignment to financial-year reporting, clearer source-water classification, and improvements to monitoring frameworks are broadly supported. The three Councils seeks further operational guidance to ensure that the Rules can be implemented consistently and without unintended compliance burden, particularly for highly technical areas such as enteric viral monitoring, radiological determinands, and continuous monitoring QA/QC.

Responses to Consultation Questions (Q1–30)

Q1 - Do you agree with the proposal to change reporting from calendar year to financial year?

- The three Councils support shifting to financial-year reporting. It improves alignment with statutory processes and reduces duplicate reporting.

Q2 - Should revised Rules reporting apply from 1 July 2027?

- Yes. The commencement date provides sufficient implementation time.

Q3 - Are there implementation issues with shifting to financial-year reporting?

- The three Councils foresees minimal implementation issues. The main work will relate to updating internal templates and systems; however, these can be managed within normal operational processes.

Q4 - Do you agree with expanding source water classes to apply to monitoring, bacteria and virus rules as well as protozoa?

- The three Councils support clearer linkages between source water class and monitoring and treatment requirements. This provides greater regulatory clarity and more efficient compliance planning.

Q5 - Do you agree that Class A source water should not require primary treatment for bacteria, viruses, or protozoa (while still requiring residual chlorine)?

- The three Councils support this risk-based approach. When robust monitoring supports a consistent Class A classification, reduced treatment requirements are reasonable and proportionate.

Q6 - Do you support the requirement for an enteric viral monitoring programme and the proposed health-outcome target (1 infection/10,000 people/year)?

- The three Councils agree with the principle but seeks clear national guidance on approved indicator methods and acceptable sampling approaches, to avoid inconsistency across suppliers.

Q7 - Should the Class A (Interim) criteria and 24-month timeframe apply?

- Yes. The interim timeframe is appropriate.

Q8 - Do you agree with the criteria for Class B source water and the Class B (Interim) requirements, including the 24-month timeframe?

- The three Councils supports this, noting the criteria align with existing practices. Clarity around reassessment triggers is beneficial.

Q9 - Do you agree that assessments for Classes A, A (Interim), B, and B (Interim) must occur immediately following any indication of contamination?

- Yes. Immediate reassessment is appropriate and supports proactive water safety management. Noting however that "immediately" should be clearly defined and supported by practical guidance.

Q10 - Do you agree with the criteria for Class C and the requirement that reassessments be undertaken by suitably qualified and experienced persons (SQEPs)?

- The three Councils agree with the criteria and supports the SQEP requirement to ensure nationally consistent, defensible assessments.

Q11 - Do you agree with the criteria for Class D source water?

- Agree. Class D criteria accurately represent higher-risk surface and shallow groundwater sources.

Q12 - Do you support limiting representative sampling to Classes A and B (including interim classes) and removing the six-bore limit?

- The three Councils supports limiting representative sampling to lower-risk aquifers. Removal of the six-bore limit is appropriate if supported by evidence and a SQEP assessment.

Q13 - Should the frequency of viral indicator testing be set by the supplier's monitoring programme?

- The three Councils agree, provided Taumata Arowai publishes clear guidance on setting sampling frequency to support consistent national practice.

Q14 - Do you support removing the requirement to monitor colour for Classes A and B?

- Yes. Colour is typically not a relevant parameter for deep groundwater sources, and its removal reduces unnecessary testing costs.

Q15 - Do you agree with requiring continuous monitoring of conductivity, pH, and turbidity for Classes A and B?

- The three Councils supports this, noting most affected sites already have continuous analyzers installed or planned. However, there will be some cost associated as some sites currently do not have conductivity monitors. Any guidance around acceptable post-treatment monitoring locations would be beneficial.

Q16 - Do you support adding boron, fluoride, and hardness to annual determinand monitoring?

- Yes. These parameters offer useful insight into groundwater chemistry, and the three Councils support their inclusion.

Q17 - Do you support removing barium, calcium, and magnesium from annual monitoring?

- Yes. The three Councils agree these determinands have limited value when hardness is already measured.

Q18 - Do you agree that radiological determinands should only be required for Classes A and B?

- Yes. This approach reflects national evidence about radiological risk and avoids unnecessary testing for higher-risk surface waters. Radiological risks are mainly associated with deep, older groundwater.

  Naturally occurring radionuclides (like uranium, radium, and radon) are typically found in deep, long-residence aquifers, which fit within Class A and B. Shallower or surface-water-influenced sources (Class C and D) generally don't spend enough time in contact with radiogenic minerals to accumulate these elements.

Q19 - Do you support shifting cyanobacteria requirements from "response plans" to prescribed monitoring actions?

- The three Councils supports this simplification. Clear rules are preferable to variable individual response plans. It would be valuable to obtain practical guidance & examples from TA to support the transition & avoid gaps between the old/ new requirements.

Q20 - Do you agree with required cyanobacteria biovolume monitoring for medium/high-risk sources?

- Yes. This is a pragmatic, risk-based requirement aligned with accepted water quality management practice. Biovolume provides a more accurate measure of risk than cell counts alone. It supports early warning and fits well with a risk-based monitoring framework, especially when backed by clear, practical guidance.

Q21 - Should monitoring be waived for suppliers using cyanotoxin removal treatment, provided post-treatment monitoring occurs?

- The three Councils supports the intent of reducing unnecessary monitoring; however, we do not support completely waiving source-water cyanobacteria monitoring for suppliers who use cyanotoxin-removal treatment. For the three Councils, upstream monitoring remains essential for several operational and risk-management reasons:

1. **Treatment at the three Councils' plants is not continuously dosed.**
   Our cyanotoxin treatment barriers (e.g., PAC) are not always operated. We rely on early detection to activate dosing in response to real, emerging risk. Without source monitoring, we would lose the ability to anticipate events and optimise treatment before cyanotoxins reach the plant.
2. **Source monitoring provides critical early warning.**
   Waiting for post-treatment monitoring alone means the first indication of a bloom may occur after cyanobacteria have already challenged the plant. This removes the ability to adjust operations proactively and may increase the likelihood of:
   - treatment performance stress
   - unintended breakthrough
   - increased chemical consumption
   - short-notice operational escalation
3. **Dam and raw-water behaviour cannot be reliably inferred from post-treatment monitoring.**
   Source waters such as dams can change rapidly due to weather patterns, stratification, catchment inputs, or ecological dynamics. Post-treatment results alone do not provide sufficient visibility of upstream conditions to support confident and consistent operational decisions.
4. **Risk is not eliminated simply because a treatment barrier exists.**
   The Rules emphasise multi-barrier approaches. Even with validated cyanotoxin removal treatment, real-time awareness of source conditions remains a cornerstone of good drinking-water risk management.
5. **Operational flexibility depends on knowing the bloom trajectory.**
   Without raw-water monitoring:
   - Operators cannot plan dosing
   - The plant may be forced into reactive rather than preventative operation
   - Resource use becomes inefficient (e.g., late PAC escalation is less effective and more costly)

For these reasons, the three Councils recommends that:

- Post-treatment monitoring alone should not replace source monitoring.
- Suppliers with intermittent or condition-based dosing must retain some level of upstream cyanobacteria/biovolume monitoring to ensure dosing decisions are timely, effective, and proportionate.

The three Councils Position:
Monitoring should not be fully waived simply because cyanotoxin-removal treatment exists. Post-treatment monitoring should complement — not replace — an appropriate level of source-water monitoring, particularly for suppliers who operate treatment barriers conditionally rather than continuously.

Q22 - Do you agree with the biovolume threshold for initiating cyanotoxin monitoring?

- The three Councils agree, noting thresholds are grounded in national expert advice.

Q23 - Do you support removing event-based monitoring requirements from the Rules?

- Yes, provided this requirement is clearly addressed in guidance and the Drinking Water Safety Plan framework.

Q24 - Do you agree with the removal of sampling footnotes from the Rules?

- Disagree. These footnotes provide important clarity on how and when to sample. Without them there is a risk of inconsistent interpretation and application across suppliers.

Q25 - Do you support reporting for continuous-monitoring rules on a monthly basis?

- The three Councils supports the change. Monthly reporting will reduce the burden of compiling large annual datasets and improve operational oversight.

Q26 - Do you support the proposed non-compliance reporting requirements for continuous monitoring?

- The three Councils agree in principle. However, clarity will be needed on data formats and transfer methods to avoid unnecessary system development costs.

Q27 - Are there cost implications?

- Minor system configuration costs are expected, but the three Councils considers them manageable.

Q28 - Do you support the inclusion of a grab-sample reporting rule (G.RR.5)?

- Yes. This improves clarity and separates grab-sample and continuous-monitoring reporting expectations.

Q29 - Do you support allowing up to 24 hours of supplementary grab samples for source/distribution monitoring equipment failure (max 48 hrs.)?

- Yes. The three Councils support this pragmatic approach. Allowing up to 24 hours of supplementary grab samples (and up to 48 hours maximum) when monitoring equipment fails. This gives suppliers a practical fallback option and helps keep monitoring going during short-term faults, as long as the expectations are clear and easy to follow.

Q30 - Do you support allowing up to 60 minutes for treatment process supplementary grab sampling?

- Yes. This better reflects real-world equipment restart times.

Closing Statement

The three Councils appreciate the opportunity to comment on the proposed DWQA Rules. We are broadly supportive of the direction of travel – particularly the move toward clearer source-water classifications, improved alignment of reporting periods, and more explicit expectations for monitoring and incident management. These changes will, in our view, strengthen national consistency and better support risk-based decision-making.

At the same time, the three Councils emphasises the importance of practical implementation. Several of the proposed requirements – especially those relating to enteric viral monitoring, radiological determinands, cyanobacteria, and continuous online monitoring – sit at the intersection of complex science, specialist laboratory capability, and day-to-day operational realities. To avoid unintended compliance burden and ensure that the Rules genuinely improve outcomes, suppliers will need clear, workable guidance and realistic expectations around transition timeframes, resourcing, and digital reporting.

From an operational perspective, our staff have highlighted two areas where further clarification or flexibility would be particularly valuable:

1. **Sampler error, false positives, and adverse conditions**
    - During consultation, we asked whether there would be any consideration for relief from extensive follow-up testing where results are clearly attributable to sampler error, laboratory artefact ("false positives"), or extreme short-term environmental conditions rather than genuine deterioration in source-water quality. The response received focussed on the importance of avoiding sampler error but did not fully address how such events will be interpreted from a compliance perspective. We encourage Taumata Arowai to consider providing explicit guidance and discretion for dealing with these situations so that resources can be directed toward managing real risk, rather than repeating large testing campaigns driven by artefactual results.

2. **Practical challenges of expanding online monitoring in the distribution system**
    - The three Councils supports, in principle, the increased use of continuous monitoring – including for free available chlorine (FAC) and pressure in the reticulation network – as an important tool for protecting consumers. However, our experience is that even relatively simple metering infrastructure can be challenging to deploy, calibrate, and maintain at scale. Extending this to a comprehensive network of online pressure and

FAC monitors will require careful planning, specialist support, and potentially external contractors/consultants to ensure data quality and system reliability. We ask that this be recognised in the way expectations, timeframes, and compliance responses are framed.

Overall, the three Councils are confident that the proposed Rules can be made achievable and effective, provided that Taumata Arowai continues to engage closely with suppliers on detailed guidance, transitional arrangements, and digital reporting standards. We welcome the opportunity to remain involved in this work and are happy to share further operational experience as implementation progresses.

Ngā mihi nui,

Monique Davidson Chief Executive Horowhenua District Council	Waid Crockett Chief Executive Palmerston North City Council	Carol Gordon Chief Executive Rangitikei District Council

NB: Additional supporting Appendices

Appendix A

The three Councils Guidance and Clarification Requests for Implementation of the proposed new Level 3 Rules

Purpose

To support nationally consistent and practical implementation of the proposed Level 3 Rules, the three Councils requests further guidance from Taumata Arowai in several operational and technical areas. These items reflect uncertainties identified during the review of the Proposed new Rules, Discussion Document, DWQAR summary list mapping to new proposed Rules 2025, Draft Guidance - How the Rules Work, and Tables 01a, 01b, 02 to 08.

1. **Monitoring Methods, Determinands, and Reporting Limits**

   Other than high rationale, accreditation, QA requirements and general sampling rules not covered in the Proposed Rules and Discussion Document, we request clarification on the below bullet points, to ensure consistency across suppliers and laboratories:

   - Accepted analytical methods for each determinand (e.g., ICP-MS, ion chromatography, culture-based, PCR, alpha/beta screening),
   - Minimum reporting limits required for compliance monitoring,
   - Standard units, rounding conventions, and uncertainty-reporting expectations,
   - Quality assurance requirements, including field blanks, duplicates, and holding times,
   - Accepted microbiological indicators, surrogate organisms, minimum sample volumes, and
   - Criteria for determining "equivalent" methods when using alternative accredited techniques.

2. **Viral Monitoring Programme & Health Outcome Target (Q6, Q13)**

   The Rules introduce the requirement for a viral monitoring programme, requirement for an SQEP-prepared report, and target of 1 infection/10,000 people/year but doesn't provide detail on methods, frequency, approved indicators, sample volumes, or worked examples, and no explanation of how compliance is calculated. Given the introduction of enteric viral monitoring, the three Councils requests guidance on the below listed bullet-points:

   - Approved indicator organisms (e.g., FRNA and somatic coliphages, PMMoV, or direct enteric virus panels),
   - Whether surrogate indicators, direct detection, or combined approaches will be accepted,
   - Expected sample volumes, concentration methods, and laboratory processing requirements,

- Guidance on setting monitoring frequency for different source classes, including small supplies,
- Expectations for demonstrating viral removal performance in treatment plants,
- A worked example of how compliance with the target of 1 infection per 10,000 people per year should be assessed (e.g., population-based model vs. QMRA vs. monitoring outcome),
- Clarification of how the health-outcome target is intended to interact with source water class, treatment validation, and routine monitoring, and additionally
- In terms of how we should handle high turbidity (NTU) post-C.t, The three Councils seeks clarification on the intent of the proposed high turbidity post-C.t rule and the hazards it is intended to manage. Turbidity can influence the effectiveness of different treatment barriers, and acceptable turbidity levels may vary depending on the primary treatment process used. Clarification on how turbidity and C.t requirements should be applied where different treatment barriers are in place (for example, UV disinfection) would support consistent and proportionate interpretation of the rules.

3. Radiological Determinands (Q18)

The Rules specify 10-year monitoring, gross alpha, gross beta, potassium-40, but do not clarify when isotopic analysis is required, sampling locations (raw vs treated for blends), and risk-based triggers. The three Councils would appreciate clarification on the below listed bullet points:

- Required determinands for screening and follow-up testing (gross alpha/beta, uranium, radium-226/228, radon-222 where appropriate),
- Screening thresholds and triggers for isotopic analysis,
- Appropriate sampling points (raw, post-treatment, or distribution for blended sources),
- Frequency expectations for Classes A and B, and how to apply risk-based frequencies for other source types, and
- Trigger conditions for radiological testing outside Classes A and B (e.g., uranium-bearing geology, bore upgrades, land-use changes).

4. **Representative Sampling Across Multiple Bores (Q12)**

The Rules include high-level criteria (Rule 7) and SQEP reassessment every 5 years, but they do not provide hydrological evidence expectations, stability criteria, or clear reassessment triggers. To support consistent implementation, the three Councils would appreciate criteria for determining when representative sampling is appropriate, including:

- Hydrogeological connectivity evidence requirements,
- Comparability of bore construction (screen intervals, casing, depth),
- Demonstration of determinand stability across a bore field,

- Evidence thresholds for reduced sampling frequency or reduced bore coverage, and
- Reassessment triggers when source conditions change (e.g., new bores, redevelopment, maintenance).

5. **Reassessment Requirements and SQEP Scope (Q9-10)**

   The Rules state that reassessment is required "immediately" and the SQEP must classify source water, but they do not define what "immediately" means, what SQEP competencies are required, and timeframes for investigations. The three Councils would appreciate clarification on the below listed bullet points:

   - Defined triggers for reassessment, including exceedances, contamination indications, abstraction changes, weather or land-use events, and bore works,
   - Recommended timeframes for initial investigation (e.g., 24–72 hrs) and full reassessment,
   - Expected competencies and qualifications for SQEPs across hydrogeology, microbiology, and radiochemistry, and
   - Standard deliverables for reassessment reports, such as sampling plans, risk characterisation, and mitigation recommendations.

6. **Sampling Locations and Continuous Monitoring Expectations (Q15, Q23-26)**

   The Rules include determinands, required frequencies, failure protocols, continuous monitoring settings but, they do not give operational guidance, such as - precision/accuracy, calibration standards, alarm thresholds, operator response expectations, rules for non-standard plant configurations. The three Councils would appreciate any clarification on the below listed bullet points:

   - Required sampling locations for source, post-treatment, and distribution systems under different supply configurations,
   - Expectations for continuous monitoring of turbidity, pH, chlorine residual, conductivity, and UVT, including:
     - minimum sensor accuracy and precision,
     - calibration schedules and documentation expectations,
     - minimum data-capture requirements,
     - alarm thresholds and recommended operator response times,
     - When continuous monitoring may supplement or replace manual sampling, and
     - Flexibility in monitoring location selection where plant layout poses constraints.

7. **Cyanobacteria: Transition from Response Plans to Prescribed Monitoring (Q19-22)**

   The Rules now prescribe monitoring actions, biovolume thresholds, treated-water checks but, they do not clarify how to transition from current response plans, seasonal expectations, visual inspection roles, and criteria for waiving monitoring with validated

treatment. The three Councils would appreciate any clarification on the below listed bullet points:

- A clear crosswalk showing how existing event-based triggers map to the new prescribed monitoring actions,
- Defined seasonal expectations for cyanobacteria monitoring (e.g., October–April),
- Guidance on frequency during high-risk seasonal periods for medium/high-risk sources,
- Clarification of the role of visual inspections alongside biovolume sampling,
- Criteria for determining when a supplier may waive monitoring due to validated cyanotoxin removal treatment, including:
  - evidence thresholds,
  - accepted treatment types (PAC, GAC, coagulation/DAF), and
  - post-treatment verification requirements.
- Guidance on confirming the end of a bloom or risk event and returning to routine monitoring.

8. Transitional Arrangements & Interactions with Drinking Water Safety Plans (Q23)

The Rules do not explain what belongs in DWSPs following removal of event-based triggers. The three Councils would appreciate any clarification on the below listed bullet points:

- Which elements of prior event-based monitoring (e.g., rainfall triggers, environmental thresholds, operational alerts) should now sit within the DWSP,
- Whether TA expects suppliers to maintain environmental and predictive triggers as best practice, even if no longer prescribed,
- How DWSP updates related to these changes will be evaluated or audited, and
- Guidance on documenting transitions between routine and elevated monitoring during seasonal or environmental changes.

9. Supplementary Grab Sampling Windows (Q29-30)

The Rules specify 24-hr per sample, max 48 hrs loss (source/distribution), 60 min (treatment), but they do not detail applicability across determinands, per-incident vs per-determinand interpretation, and required documentation. The three Councils would appreciate any clarification on the below listed bullet points:

- Whether the 48-hour maximum applies per incident or per determinand,
- Applicability across all determinands or only those usually monitored continuously,
- How supplementary sampling applies during treatment restart or elevated risk conditions, and
- Documentation expectations when applying the supplementary sampling allowance.

10. Continuous Monitoring QA/QC Expectations (Q15, Q25-26)

The Rules specify calibration/verification, recording frequencies, substitution with grab samples, but no guidance on uptime thresholds, alarm management, drift tolerance, corrective actions. The three Councils would appreciate any clarification on the below listed bullet points:

- Calibration and verification requirements (frequency, acceptable drift),
- Minimum uptime/data-capture requirements for compliance,
- Expectations for alarm management, operator response, and corrective actions,
- Integration of continuous monitoring data into monthly reporting, and
- Documentation of sensor failures, maintenance, and data adjustments.

11. Short – Term Incident Management and Compliance Pathways

The Rules introduce new reporting expectations, more granular non-compliance tracking, but they do not explain interpretation of "short-term" vs "long-term", enforcement thresholds, and communication expectations. The three Councils seeks greater clarity on how short-term operational or water-quality incidents will be interpreted under the new Rules, including:

- Definitions of short-term vs long-term non-compliance,
- When exceedances trigger formal enforcement versus advisory engagement,
- Interaction between monitoring non-compliance and DWSP risk management,
- Communication expectations for consumers during various incident types, and
- Documentation and investigation requirements following incidents.

12. Data Reporting Standards and Format Requirements (Q25-28)

The Rules require digital reporting, continuous monitoring non-compliance reporting, but no schemas or metadata detail yet. The Discussion Document explicitly says new schemas will be developed later. To support digital reporting, the three Councils requests:

- Standard schemas for data submission (CSV, XML, JSON),
- Required metadata (sampling location, method, operator, calibration status, uncertainty),
- Validation and error-handling rules for automated uploads, and
- Frequency, aggregation, and storage requirements for continuous monitoring data.

13. Non-Compliance Actions and Follow-Up Requirements (Q26)

The Rules do not specify mandatory corrective actions, required documentation, and risk-class-based communication thresholds. The three Councils would appreciate clarification on the below listed bullet points:

- Expected immediate actions and notification timeframes,
- Interim risk management steps for suppliers,
- Documentation and follow-up investigation requirements

- Templates for non-compliance reports, including corrective action tracking, and
- Consumer communication expectations for different risk classes.

Appendix B – Gap Analysis Matrix

Section 1 – Source Water Monitoring (S3)

1.1 Monitoring Determinands and Methods

The three Councils Clarification / Guidance Request:
Provide detailed guidance on determinands required for S3 monitoring, including recommended methods, test sensitivity, minimum reporting limits, and laboratory accreditation expectations. Clarify how suppliers should choose determinands relevant to local catchment risks.

Where TA Addresses It:
High-level determinand categories appear in Proposed Rules (S3) and limited commentary in the Discussion Document. No Operational Guidance exists in Draft Guidance. Tables 03 and 01a repeat rule structure but provide no method guidance.

Gap Remaining:
No determinand lists, no method specification, no test sensitivity expectations, and no clear instructions for how suppliers should establish fit-for-purpose monitoring programmes.

Justification for Guidance:
Without determinand-level guidance, suppliers will interpret requirements inconsistently, resulting in variable data quality and potential under-monitoring of important contaminants.

Implications if Unresolved:
Incorrect or incomplete source monitoring may lead to misclassification of water, missed contamination events, and incorrect risk management at treatment plants.

1.2 Determining Representative Sampling Locations

The three Councils Clarification / Guidance Request:
Provide criteria for defining “representative” sampling points across multiple bores or surface water intakes, including hydrological assessment requirements, bore screen depth considerations, source connectivity, and stability over time.

Where TA Addresses It:
References to representative sampling appear in Proposed Rules S3 and minimal explanation in Discussion Document. Table 03 provides rule structure but no technical detail.

Gap Remaining:
TA does not provide any hydrological or operational guidance on how suppliers should justify representative sampling, nor what evidence is required to support a representative sampling plan.

Justification for Guidance:
Without nationally consistent criteria, suppliers may over- or under-sample bores,

weakening the reliability of S3 assessments and affecting classification and treatment requirements.

Implications if Unresolved:
Potential misclassification of source water, inefficient sampling (excess or insufficient), increased compliance risk, and inconsistent application of Rules across New Zealand.

1.3 Source Water Monitoring Frequencies – Interpretation and Flexibility

The three Councils Clarification / Guidance Request:
Clarify whether frequencies are minimums, how seasonal patterns should be incorporated, and when suppliers may increase/decrease frequencies based on risk.

Where TA Addresses It:
Frequencies are listed in Proposed Rules only; no interpretation guidance. Discussion Document acknowledges risk-based approaches but does not operationalise them. Tables of Changes (03) confirm frequencies but do not clarify flexibility.

Gap Remaining:
No guidance on how suppliers should adapt monitoring based on seasonal cyanobacteria risk, groundwater level fluctuations, or contamination seasonality.

Justification for Guidance:
Suppliers need certainty on when it is acceptable to modify frequencies without breaching compliance.

Implications if Unresolved:
Over-monitoring (cost burden) or under-monitoring (safety risk), and inconsistent interpretation between suppliers and regulators.

Section 2 – Source Water Classes and Reassessment

2.1 Criteria for Class A vs Class B vs Class C Determination

The three Councils Clarification / Guidance Request:
Seek detailed criteria for determining Class A and B groundwater, including aquifer characteristics, sanitary borehead performance, expected contaminant pathways, and supporting evidence required.

Where TA Addresses It:
Proposed Rules and Tables 01b outline classification categories and high-level definitions. Discussion Document provides rationale but no practical guidance. No guidance in Draft Guidance.

Gap Remaining:
No hydrological, geological, or risk-based criteria are provided to support classification; no examples or case studies.

Justification for Guidance:
To prevent inconsistent classifications and ensure equitable application nationwide.

Implications if Unresolved:
Variability in assessments, disputes over classification, increased regulatory workload, and possible misalignment between true risk and rule application.

2.2 Evidence Requirements for SQEP Reassessment

The three Councils Clarification / Guidance Request:
Guidance on what constitutes appropriate evidence for SQEP-led reassessments: monitoring duration, number of samples, parameters, seasonal coverage, and acceptable uncertainty.

Where TA Addresses It:
The Proposed Rules state reassessments must be conducted and specify triggers but provide no detail. No operational guidance in Discussion Document, Draft Guidance or tables.

Gap Remaining:
Criteria for reassessment quality, expectations for data coverage, and methods for uncertainty analysis are missing.

Justification for Guidance:
SQEPs require clarity to ensure consistent assessments and defensible conclusions.

Implications if Unresolved:
Inconsistent reassessment quality; risk of suppliers over- or under-treating water due to misclassification; regulatory disputes likely.

2.3 Interpretation of "Immediately" for Reassessment Upon Significant Change

The three Councils Clarification / Guidance Request:
Define operational meaning for "immediately" when source conditions change—e.g., contamination spike, bore field interference, land use changes.

Where TA Addresses It:
Term appears in the Proposed Rules but has no elaboration in guidance documents or Tables of Changes.

Gap Remaining:
Ambiguity over response timeframes and operational expectations.

Justification for Guidance:
Without clarification, suppliers may interpret the requirement differently, leading to inconsistent compliance.

Implications if Unresolved:
Regulatory uncertainty, potential enforcement inconsistencies, and delayed response to evolving risks.

Section 3 – Cyanobacteria & Cyanotoxin

3.1 Operational Monitoring Requirements after Removal of Response Plans

The three Councils Clarification / Guidance Request:
Guidance on how suppliers should design cyanobacteria monitoring programmes in the absence of mandated response plans—visual inspections, biovolume sampling, triggers, and seasonal expectations.

Where TA Addresses It:
The Proposed Rules remove the requirement for Response Plans. The Discussion Document and Table 07 outline monitoring frequencies but not operational design. No content in Draft Guidance.

Gap Remaining:
No instructions exist for suppliers to design or justify monitoring approaches, especially in lakes, reservoirs, or variable catchments.

Justification for Guidance:
The removal of Response Plans creates a vacuum; suppliers need direction on practical monitoring expectations.

Implications if Unresolved:
Inconsistent monitoring programme design, possible gaps in early bloom detection, and increased public health risk.

3.2 Clarifying Biovolume Calculation, Sampling Methods & interpretation

The three Councils Clarification / Guidance Request:
Request guidance on biovolume calculation methods, sampling depth, frequency, and required taxonomic resolution.

Where TA Addresses It:
Biovolume thresholds (e.g., 0.25 mm^3/L) appear in the Proposed Rules. No technical guidance appears in Discussion Document, Draft Guidance, or Table 07.

Gap Remaining:
No methodology for determining biovolume, no standardisation of sampling, no QA/QC, and no example profiles for stratified lakes.

Justification for Guidance:
Ensures consistent interpretation and avoids laboratory-to-laboratory variability.

Implications if Unresolved:
Potential for false positives/negatives, inconsistent treatment responses, or unnecessary operational changes.

3.3 Monitoring Expectations for Cyanotoxin Removal Treatment Plants

The three Councils Clarification / Guidance Request:
Guidance is required on operational monitoring when activated carbon, oxidation, or advanced treatments are used for cyanotoxin removal—dosing, performance verification, and monitoring points.

Where TA Addresses It:
The Proposed Rules require monthly monitoring when cyanotoxin removal treatment is used. Table 07 provides frequency escalation but no operational expectations.

Gap Remaining:
No process design, no monitoring point requirements, no operational thresholds, and no expectations for effectiveness verification.

Justification for Guidance:
Operators require actionable steps to avoid exceedances and incorrect dosing.

Implications if Unresolved:
Risk of ineffective toxin removal or over-dosing chemical treatments.

3.4 Transitional Arrangements After Removing Response Plans

The three Councils Clarification / Guidance Request:
Request guidance on how existing cyanobacteria response plans should be transitioned, including whether elements like bloom history analysis or site-specific risk assessments should still be retained.

Where TA Addresses It:
TA acknowledges removal of response plans in the Proposed Rules and Discussion Document but offers no transitional guidance.

Gap Remaining:
Suppliers have no clarity on what legacy plan elements remain valuable operationally and what is obsolete.

Justification for Guidance:
Ensures continuity of best practice during regulatory transition.

Implications if Unresolved:
Potential confusion and inconsistent operational readiness during bloom events.

Section 4 – Enteric Viral Monitoring Programme

4.1 Methods, Indicators and Laboratory Requirements

The three Councils Clarification / Guidance Request:
Provide clear guidance on acceptable enteric virus indicators, methods (PCR targets or surrogates), sample volumes, laboratory QA/QC expectations, reporting limits, and how virus detection should be interpreted for risk assessment.

Where TA Addresses It:
The Proposed Rules require an Enteric Viral Monitoring Programme and a SQEP-prepared assessment. The Discussion Document sets the health outcome target (1 infection per 10,000 people per year) but gives no technical detail. The Draft Guidance contains none. No method-level detail is provided in Tables 01–08.

Gap Remaining:
No approved list of indicators (e.g., adenovirus, norovirus GI/GII), no minimum sample sizes, no prescribed analytical methods, no guidance on interpreting positive results.

Justification for Guidance:
Suppliers need clarity to design valid monitoring programmes that can reliably inform risk and treatment decisions. Virus monitoring is highly technical and high consequence.

Implications if Unresolved:
Inconsistent or unreliable assessments across suppliers; unclear regulatory expectations; impaired ability to meet health outcome targets.

4.2 Frequency Determination and Sampling Design

The three Councils Clarification / Guidance Request:
Guidance on how suppliers should determine appropriate frequency of viral sampling, including seasonal considerations, source class, historical data, and operational risks.

Where TA Addresses It:
The Proposed Rules state that frequency must be "sufficient" but do not define sufficiency. No detail in the Discussion Document, Draft Guidelines, or Tables.

Gap Remaining:
No frameworks or minimums exist for determining sampling frequency.

Justification for Guidance:
Virus occurrence is sporadic, requiring thoughtful sampling strategy; suppliers need a defensible approach.

Implications if Unresolved:
Suppliers may undersample or oversample; inconsistent compliance and widely variable data reliability.

4.3 Integration of Viral Results into Source Water Classification and DWSP

The three Councils Clarification / Guidance Request:
Clarify how viral monitoring results should influence source water class (S3) and Drinking Water Safety Plans, including escalation triggers and reclassification thresholds.

Where TA Addresses It:
Rules reference viral monitoring as part of S3, but no integration guidance is provided in the Discussion Document, Draft Guidelines, or Tables.

Gap Remaining:
No technical link is defined between viral results and classification decisions.

Justification for Guidance:
Risk-informed decision-making requires transparent integration of viral data.

Implications if Unresolved:
Misalignment between real viral risk and formal source water class; inconsistent application of treatment barriers.

Section 5 – Chemical Monitoring (T3 Chemical)

5.1 Determinands for Monitoring and Decision-Making Framework

The three Councils Clarification / Guidance Request:
Provide a clear list of treatment-formed chemicals, impurities in reagents, and relevant determinands (e.g., chlorate, bromate, DBPs) alongside guidance on how suppliers assess which chemicals require monitoring.

Where TA Addresses It:
The Proposed Rules require suppliers to maintain a schedule of chemicals and identify which have MAVs. Table 06 outlines monthly monitoring frequency. The Discussion Document and Draft Guidance provide no determinand-specific guidance.

Gap Remaining:
The Rules do not specify which determinands must be included or give criteria for inclusion/exclusion.

Justification for Guidance:
Ensures suppliers consistently identify and monitor substances most relevant to their treatment processes.

Implications if Unresolved:
Under-monitoring of important chemical contaminants or over-monitoring of irrelevant ones, leading to cost inefficiencies and potential health risks.

5.2 Operational Guidance for Chemical Dosing and Monitoring Points

The three Councils Clarification / Guidance Request:
Guidance on where monitoring should occur (post-treatment, post-contact tank), particularly for coagulants, oxidants, and pH adjustment systems. Clarify requirements for monitoring contact time where chlorine contact tanks are present.

Where TA Addresses It:
The Proposed Rules identify required monitoring frequency but do not specify where samples should be taken operationally. Table 06 repeats rule structure but provides no practical direction. No guidance in the Discussion Document or Draft Guidance.

Gap Remaining:
No operational instructions exist on sampling location, tank hydraulics, or ensuring representative samples.

Justification for Guidance:
Correct sampling location is essential for compliance and accurate assessment of treatment performance.

Implications if Unresolved:
Misleading sample results, compliance errors, potential public health risk due to undetected chemical variability.

5.3 Identification and Monitoring of Treatment-By-Products

The three Councils Clarification / Guidance Request:
Guidance to identify by-products formed during treatment processes (e.g., THMs, HAAs, chlorite/chlorate, bromate), how to assess their formation potential, and when monitoring is required.

Where TA Addresses It:
The Proposed Rules require monitoring of "chemicals that may be formed in the treatment process," but neither Rules nor Tables specify how suppliers identify them.

Gap Remaining:
No framework for determining what by-products are likely, nor what triggers monitoring.

Justification for Guidance:
Supports proactive risk management and ensures compliance with MAVs.

Implications if Unresolved:
Inconsistent monitoring of DBPs across New Zealand and possible regulatory misalignment.

Section 6 – Bacteria & Virus Treatment (T3 BV)

6.1 Continuous Monitoring Requirements for Disinfection

The three Councils Clarification / Guidance Request:
Provide clarity on accuracy, precision, calibration, verification, and drift tolerances for continuous monitoring (e.g., FAC, chlorine dioxide, ozone, UV dose). Include expectations for alarm thresholds and operator response times.

Where TA Addresses It:
The Proposed Rules require continuous monitoring but do not specify performance standards. Discussion Document and Draft Guidance do not advise. Tables (04) consolidate rules but contain no technical criteria.

Gap Remaining:
No defined QA/QC for continuous monitoring systems.

Justification for Guidance:
Ensures continuous data are reliable and comparable between suppliers.

Implications if Unresolved:
Risk of misinterpreting continuous data, false compliance or non-compliance, and potential under-disinfection.

6.2 Interpretation of Disinfection C.t Requirements

The three Councils Clarification / Guidance Request:
Provide detailed guidance on calculating C.t values, acceptable methods, dealing with variable flows and temperatures, and what constitutes a validated contact tank.

Where TA Addresses It:
The Proposed Rules include C.t requirements but without explanation. Tables provide no methodology. No examples in the Discussion Document or Draft Guidance.

Gap Remaining:
No practical instruction for how to calculate or validate C.t.

Justification for Guidance:
Suppliers need reliable and consistent interpretation of C.t to ensure effective pathogen inactivation.

Implications if Unresolved:
Potential loss of disinfection efficacy; excessive conservatism in design; regulatory disputes.

6.3 Expectations for Managing Continuous Monitoring Failure or Sensor Drift

The three Councils Clarification / Guidance Request:
Clarify acceptable downtime thresholds, alternative monitoring methods, escalation requirements, and documentation expectations during instrumentation failure.

Where TA Addresses It:
The Proposed Rules mention supplementary grab sampling allowances but do not define expectations for documented failure procedures. No detail in the Discussion Document, Draft Guidance, or Tables.

Gap Remaining:
No guidance on continuity planning, redundancy expectations, or acceptable verification schedules.

Justification for Guidance:
Reduces compliance ambiguity during operational difficulties.

Implications if Unresolved:
Risk of unreported or undetected inadequacies in disinfection performance.

6.4 Linking Bacterial/Viral Results to Treatment Performance Assessment

The three Councils Clarification / Guidance Request:
Clarify when bacterial exceedances or viral detections should trigger treatment performance reviews, intensified monitoring, or revalidation.

Where TA Addresses It:
The Proposed Rules require monitoring but no link to corrective action decision-making. No clarity in the Discussion Document, Draft Guidance, or Tables.

Gap Remaining:
No action thresholds or guidance for operational response.

Justification for Guidance:
Ensures consistent risk management across the sector.

Section 7 – Protozoa Treatment (T3 PZ)

7.1 Criteria for Selecting Appropriate Protozoa Treatment Processes

The three Councils Clarification / Guidance Request:
Guidance is needed on how suppliers choose the most appropriate protozoa treatment barrier(s) (e.g., coagulation + filtration, membrane, UV), considering source water class, variability, raw water turbidity, and operational capability.

Where TA Addresses It:
The Proposed Rules specify required log credits for each source class and list acceptable processes. Table 05 consolidates processes and removes some unused options. The Discussion Document provides rationale but no operational detail. No guidance in Draft Guidance.

Gap Remaining:
No decision-making framework, no consideration of source water variability, no direction on treatment suitability under different operating conditions.

Justification for Guidance:
Ensures suppliers design protozoa barriers appropriate to their source water risk profile and operational environment.

Implications if Unresolved:
Potential misalignment between treatment chosen and actual protozoa risk; risk of inadequate protection or overinvestment.

7.2 Validation, Calibration, and Performance Monitoring Requirements

The three Councils Clarification / Guidance Request:
Specify how suppliers should validate and verify the performance of protozoa treatment processes, including turbidity limits, monitoring frequencies, and acceptable ranges for performance indicators.

Where TA Addresses It:
The Proposed Rules note that water leaving a filter must have lower turbidity than water entering (Table 05). No detail on validation procedures, jar testing, filter profiling, or UV validation. No information in the Discussion Document or Draft Guidance.

Gap Remaining:
Key operational expectations (e.g., turbidity targets, flux limits, transmembrane pressure thresholds, UV validation protocols) are missing.

Justification for Guidance:
Protozoa treatment efficacy depends on consistent performance of treatment processes.

Implications if Unresolved:
Ongoing risk of protozoa breakthrough, system underperformance, and challenges during regulatory audits.

7.3 Cumulative Log Credit Calculation Clarity

The three Councils Clarification / Guidance Request:
Provide examples and worked scenarios showing how cumulative log credits may be added when combining filtration and disinfection steps.

Where TA Addresses It:
The Proposed Rules outline the principles for combining log credits. Table 05 explains removal of certain filtration combinations. No worked examples appear in documents or Tables.

Gap Remaining:
Suppliers are left to interpret how to combine log credits in multi-barrier systems.

Justification for Guidance:
Ensures transparent and consistent application.

Implications if Unresolved:
Risk of miscalculation, incorrect barrier selection, and potential compliance issues.

Section 8 – Continuous Monitoring Expectations

8.1 Definition of Accuracy, Precision and Reliability Requirements

The three Councils Clarification / Guidance Request:
Guidance on performance requirements for continuous monitoring (accuracy, resolution, calibration intervals, verification methods) for parameters such as turbidity, pH, chlorine, UV dose, flow, and pressure.

Where TA Addresses It:
The Proposed Rules mandate continuous monitoring for various determinands but do not specify performance standards. No detail in the Discussion Document or Draft Guidance. Tables 04, 05, 06, 08 confirm continuous monitoring but do not define expectations.

Gap Remaining:
No standardised QA/QC framework exists to ensure data integrity.

Justification for Guidance:
Reliable and accurate continuous monitoring is essential for compliance and effective operation.

Implications if Unresolved:
Inconsistent data quality, potential misinterpretation, and regulatory confusion.

8.2 Expectations for Alarm Settings and Operator Response Times

The three Councils Clarification / Guidance Request:
Guidance on acceptable alarm thresholds, notification requirements, operator response times, and documentation expectations during abnormal events.

Where TA Addresses It:
Not addressed in Rules, Discussion Document, Draft Guidance, or Tables.

Gap Remaining:
No operational benchmarks for managing excursions.

Justification for Guidance:
Suppliers must understand what constitutes a reasonable response.

Implications if Unresolved:
Delayed corrective actions; ambiguous compliance interpretation.

8.3 Handling and Reporting Instrument Downtime

The three Councils Clarification / Guidance Request:
Clarify expectations for documenting downtime, acceptable substitute data (if any), and how extended outages should be reported or managed.

Where TA Addresses It:
The Proposed Rules specify 24-hour or 60-minute windows for supplementary grab sampling but do not define documentation or analysis expectations during downtime.

Gap Remaining:
Suppliers lack direction on when downtime creates non-compliance.

Justification for Guidance:
Ensures consistent and fair reporting practices.

Implications if Unresolved:
Disparate interpretations of instrument failure periods and potential for enforcement inconsistencies.

Section 9 – Supplementary Grab sampling

9.1 Clarity on When Supplementary Grab Samples Apply

The three Councils Clarification / Guidance Request:
Provide specific criteria on when supplementary grab samples may be used (instrument failure, calibration, maintenance, drift, data corruption) and how frequently they should be collected.

Where TA Addresses It:
The Proposed Rules define the time allowance for supplementary sampling but not the scenarios. No detail in the Discussion Document, Draft Guidance, or Tables.

Gap Remaining:
No clear scenarios or decision rules exist for applying supplementary sampling.

Justification for Guidance:
Suppliers need consistency to ensure compliance is correctly interpreted.

Implications if Unresolved:
Risk of inconsistent compliance determinations across suppliers and regulators.

9.2 Documentation and Reporting Requirements During Supplementary Sampling

The three Councils Clarification / Guidance Request:
Clarify what records must be kept when supplementary sampling is used—instrument fault logs, SCADA evidence, calibration records, justification for sample timing, and chain-of-custody.

Where TA Addresses It:
Not in the Proposed Rules, Discussion Document, Draft Guidance, or Tables.

Gap Remaining:
Suppliers lack clarity about documentation expectations for audit or regulatory review.

Justification for Guidance:
Transparent evidence trail reduces compliance uncertainty.

Implications if Unresolved:
Disputes during compliance checks; inconsistent application of evidence standards.

9.3 Guidance on Applying Supplementary Sampling Across Determinand Types

The three Councils Clarification / Guidance Request:
Clarify whether supplementary sampling rules apply equally to bacterial, viral, protozoal, chemical, cyanotoxin, and operational parameters.

Where TA Addresses It:
The Proposed Rules describe window lengths but not determinand applicability; no clarification appears in the Discussion Document, Draft Guidance, or Tables.

Gap Remaining:
Ambiguity regarding applicability to different monitoring rules.

Justification for Guidance:
Ensures suppliers understand which rules allow supplementary sampling.

Implications if Unresolved:
Suppliers may misapply supplementary sampling, risking non-compliance.

SECTION 10 – Distribution System Rules (D3)

10.1 Selection and Justification of Representative Monitoring Locations

The three Councils Clarification / Guidance Request:
Provide guidance on how suppliers should select sites representative of "normal pressure" and "lowest pressure" within each distribution zone, including hydraulic modelling expectations, seasonal variability, and operational constraints.

Where TA Addresses It:
The Proposed Rules require continuous pressure monitoring at representative locations. The Discussion Document provides brief rationale. Table 08 repeats rule structure but does not provide any site selection criteria.

Gap Remaining:
No methodology for determining representative points, no examples of acceptable evidence, and no direction on how to adjust sites after network changes.

Justification for Guidance:
Ensures consistency across suppliers and prevents under-monitoring or incorrect siting.

Implications if Unresolved:
Non-representative monitoring could fail to detect low pressure events, increasing contamination risks.

10.2 Monitoring Requirements During Low Pressure or Transient Events

The three Councils Clarification / Guidance Request:
Clarify operational expectations during pressure loss or transients, including grab sampling requirements, disinfection verification, public communication triggers, and documentation of event boundaries.

Where TA Addresses It:
The Proposed Rules outline minimum pressure levels but not operational response. No content in the Discussion Document, Draft Guidance, or Table 08.

Gap Remaining:
No risk-based operational framework for responding to pressure incidents.

Justification for Guidance:
Pressure loss is a known risk factor for contamination; clear expectations are needed for safety and compliance.

Implications if Unresolved:
Inconsistent responses, delays in corrective action, and potential for increased public health risk.

10.3 Guidance on Dead-End or Low-Flow Areas

The three Councils Clarification / Guidance Request:
Clarify monitoring expectations for dead-ends, low-flow zones, and areas with historical residual decay or elevated risk.

Where TA Addresses It:
Not addressed anywhere in the Proposed Rules, Discussion Document, Draft Guidance, or Table 08.

Gap Remaining:
No operational advice on managing locations with elevated risk of stagnation or disinfectant decay.

Justification for Guidance:
Supports proactive water quality management, particularly in older or complex networks.

Implications if Unresolved:
Risk of undetected bacterial regrowth or DBP formation; inconsistent compliance expectations.

10.4 Expectations for Backflow Prevention Programme Implementation

The three Councils Clarification / Guidance Request:
Clarify acceptable methods for identifying high-risk backflow sites, frequency of verification, and evidence required to demonstrate adequate protection.

Where TA Addresses It:
The Proposed Rules require a programme and 5-yearly surveys. Table 08 restates these requirements without operational detail. No elaboration in the Discussion Document or Draft Guidance.

Gap Remaining:
Criteria for high-risk identification and verification are missing.

Justification for Guidance:
Ensures backflow risks are managed consistently and effectively.

Implications if Unresolved:
Variability in backflow survey quality; potential for overlooked high-risk sites.

SECTION 11 – DATA, METADATA & REPORTING REQUIREMENTS

11.1 Data Standards and Metadata Requirements for Monitoring Results

The three Councils Clarification / Guidance Request:
Develop clear metadata requirements for all monitoring data, including sampling location information, method codes, detection limits, instrument ID, calibration history, environmental notes, and any corrections applied.

Where TA Addresses It:
The Proposed Rules state monitoring must be reported but do not specify metadata. Discussion Document notes digital reporting needs but provides no schema. Draft Guidance does not cover metadata. Tables do not address this.

Gap Remaining:
Suppliers lack direction on the minimum information needed to make monitoring data traceable and auditable.

Justification for Guidance:
Ensures data is meaningful, comparable, and usable for compliance and risk management.

Implications if Unresolved:
Regulatory uncertainty, inconsistent reporting, and reduced data reliability.

11.2 Clarifying Reporting Requirements for Continuous Monitoring Non-Compliance

The three Councils Clarification / Guidance Request:
Provide detail on how continuous monitoring exceedances must be reported, including duration, timestamp resolution, extent of deviation, trending, and documentation of corrective action.

Where TA Addresses It:
Table 06 introduces additional reporting for continuous monitoring but provides only high-level descriptions. No detail is included in The Proposed Rules, Discussion Document, or Draft Guidance.

Gap Remaining:
Unclear expectations create risk of inconsistent reporting and varying regulatory responses.

Justification for Guidance:
Supports consistent interpretation of continuous monitoring data across suppliers.

Implications if Unresolved:
Non-uniform reporting; compliance uncertainty; administrative burden for suppliers and regulator.

11.3 Digital Reporting Schema and File Format Requirements

The three Councils Clarification / Guidance Request:
Request guidance on file formats, schemas, data validation rules, and data transfer expectations for reporting to Taumata Arowai.

Where TA Addresses It:
The Discussion Document notes that "new digital systems will be developed" but provides no technical detail. No schema exists in Rules, Draft Guidance, or Tables.

Gap Remaining:
Suppliers lack design criteria for internal data systems and workflows.

Justification for Guidance:
Digital reporting systems require early alignment to avoid expensive retrofits.

Implications if Unresolved:
Substantial cost increases for suppliers; potential delays in achieving compliance.

11.4 Integration of Monitoring Data into DWSPs and Risk Assessments

The three Councils Clarification / Guidance Request:
Clarify how monitoring results—especially exceedances, trends, and episodic events—should contribute to DWSP updates, risk reassessments, and treatment optimisation.

Where TA Addresses It:
The Proposed Rules and the Discussion Document emphasise risk-based supply management but do not define how monitoring data should feed into DWSP processes.

Gap Remaining:
No operational framework for linking monitoring insights to risk management actions.

Justification for Guidance:
Supports consistent and proactive water safety management.

Implications if Unresolved:
Missed opportunities for early risk mitigation; inconsistent DWSP updates.

Closing Statement

This gap analysis demonstrates that while the Proposed Rules, Discussion Document, Draft Guidance, and Tables of Changes (01a–08) provide structural and regulatory clarity, they do not yet supply the operational guidance required to implement the Proposed Rules consistently across New Zealand.

For the Proposed Rules to be practical, auditable, and proportionate, suppliers require clear national guidance that covers:

- methods
- determinand

- monitoring design
- operational expectations
- data and reporting standards
- interpretation guidance
- examples and case studies

The three Councils therefore respectfully recommends that Taumata Arowai develop detailed guidance to support the implementation of the Level 3 Rules, ensuring consistency, clarity, and improved drinking water safety outcomes across all suppliers.


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