

Response ID ANON-USC2-RY49-N

Submitted to Have your say on proposed changes to drinking water Acceptable Solutions
Submitted on 2025-06-12 15:31:58

Tell us about yourself

1 What is your name?

First name:

Arno

Last name:

Benadie

2 What is your email address?

Email:

arno.benadie@rangitikei.govt.nz

3 Where do you live?

Manawatū – Whanganui

4 Are you providing feedback as an individual or on behalf of an organisation?

On behalf of an organisation or group

Information about your organisation

5 If you're providing feedback on behalf of an organisation, please enter the organisation's name and your position/title within the organisation

Organisation :

Rangitikei District Council

Position/Title :

Deputy Chief Executive / Group Manager Assets, Infrastructure and Projects

Which of these options best describes you in the context of this consultation?

6 Which of these options best describes you in the context of this consultation?

Other

If other, please specify:

Mixed-use rural water supply (Council is a registered drinking water supplier for other supplies)

Publishing submissions and Official Information Act 1982 requests

8 Do you give us permission to proactively publish your submission?

Yes, you may publish this submission including my personal details (name, organisation, email address).

9 Do you approve including your personal details in response to any related future Official Information Act requests received by Taumata Arowai?

Yes, you can include my personal details in response to Official Information Act requests.

Making all the Acceptable Solutions based on supply type rather than some being based on source water type

10 Do you agree that the proposal for two new acceptable solutions will make it easier for water suppliers to identify what Acceptable Solution to comply with?

I don't know

Please provide any further comment in the box below: :

Rangitikei District Council does not have a view on this as its interest is confined to the Acceptable Solution for mixed-use rural water supplies. Currently there are three of these supplies in the Rangitikei District – Erewhon, Hunterville and Omatane.

Allowing end-point treatment where the UV disinfection systems are not validated in some circumstances

11 Do you agree with the proposal to allow end-point UV disinfection systems that are not validated where 25 people or fewer are supplied and it is not a supply for a community purpose or public building?

Yes

Please provide any further comment in the box below: :

Council considers this is a helpful acknowledgement of the much lower risk for farmers connected to mixed-use rural supplies.

12 Do you agree with the proposed situations where validated end-point UV disinfection systems will still be required?

No

Please provide any further comment in the box below: :

For Rangitikei, this would apply only in the Omatane scheme, because it provides drinking water to the Omatane Hall, where there could be more than 25 people attending a meeting. This will be a significant cost for the Hall management committee; they may consider it is preferable to install a rainwater tank (so becoming a self-supplying building). If that isn't a cost-effective solution, the Hall may need to be closed unless it is placed on a permanent boil notice.

We suggest that 'community purpose' distinguishes between frequent (i.e. at least once every month) and infrequent use (i.e. less than once a month), with the latter being permitted to use an unvalidated end-point treatment system.

13 Do you agree with the proposal to remove some end-point treatment system requirements that are in the current Acceptable Solutions?

Yes

Please provide any further comment in the box below: :

Council supports these changes, but would want to see the guidance information to be certain of the effect.

14 Do you agree that the legacy clause is still required?

Yes

Please provide any further comment in the box below: :

Although not relevant to Council's situation, we support this proposal.

Suppliers to provide information to consumers

15 Do you agree with the proposed requirements for suppliers to provide information to property owners and consumers on source water monitoring, annual testing and treatment advice, and (where necessary) what end-point treatment devices to install, maintain and test?

Yes

Please provide any further comment in the box below: :

Council agrees it is important for consumers to understand how to minimise risk to their drinking water, but it would rely on the Authority to provide that information.

Page 11 of the Discussion document implies it is the consumer to install, maintain and test end-point treatment devices. However, the Authority's Policy statement published on 5 February 2025 states that 'the supplier is responsible for the installation, testing and maintenance of end-point systems' clarifying that 'owners and operators of mixed-use rural supplies are drinking water suppliers under the Water Services Act'. That policy statement provides a flow-chart on how suppliers can meet their end-point treatment responsibilities. If this remains the Authority's position, Council suggests that it is included within the Acceptable Solutions document(s).

We note that MUR.13 of the draft regulation seems to repeat this ambiguity with the opening phrase 'If the drinking water supplier requires the owner of the premises to install, maintain and test an end-point treatment device...'

Aligning the Acceptable Solution for Self-supplied Buildings with the Rules requirements

16 Do you agree with the proposed increase to 10 buildings to be supplied from a single treatment system on the same property or in common ownership?

Yes

Please provide any further comment in the box below: :

While this does not relate to mixed-use rural supplies, Council hopes the Authority has given careful consideration to the needs of marae.

17 Do you agree with the proposed requirements that must be met for the increase to 10 buildings to be permitted including an increase in inspections of storage tanks to every 3 months?

Yes

Please provide any further comment in the box below: :

While this does not relate to mixed-use rural supplies, Council hopes the Authority has given careful consideration to the needs of marae.

Changing the requirements for pre-requisite and ongoing monitoring

18 Do you agree with the proposed changes to the pre-requisite monitoring?

Yes

Please provide any further comment in the box below: :

Council agrees with the reduced frequency of mandatory testing.

Specific performance criteria to address turbidity

19 Do you agree with the turbidity performance requirement?

No

Please provide any further comment in the box below: :

Council considers that meeting this low level of turbidity is likely to be a problem for both the Hunterville and Omatane supplies which rely on surface source water. That may mean it is not feasible to install end-point treatment for farmers on those two schemes. A centralised treatment plant would not be a feasible alternative. We note that the Authority is intending to provide guidance on managing turbidity issues and hope that this will be available before the end of this year.

20 Do you agree with the UV transmittance performance requirement?

I don't know

Please provide any further comment in the box below: :

Council has yet to undertake sampling of the source water for all its three mixed-use rural supplies so does not know the effect of these requirements on the feasibility of end-point treatment.

Proposed changes to monitoring requirements

21 Do you agree with the proposed changes to the monitoring requirements?

Yes

Please provide any further comment in the box below: :

Council agrees with the proposed reduction in monitoring requirements. However, it will still be an additional cost to those schemes which continue to provide drinking water to consumers.

22 Do you agree with the proposed post-treatment monitoring requirements for self-supplied buildings?

I don't know

Please provide any further comment in the box below: :

Council does not have a view on this, as the proposed changes do not apply to any of its mixed-use rural supplies.

Requirements when base population limits are exceeded

23 Do you agree with the proposed requirements when there is an exceedance of base population limits?

I don't know

Please provide any further comment in the box below: :

Council does not have a view on this, as the proposed changes do not apply to any of its mixed-use rural supplies.

Allowing for downstream supplies in the Acceptable Solution for Mixed-use Rural supplies

24 Do you agree with the proposal that end-point treatment is not required in a downstream supply which provides centralised treatment?

Yes

Please provide any further comment in the box below: :

Council supports this change. It means that the Hunterville town supply (which is supplied by the Hunterville rural supply and separately treated before being reticulated to consumers) can be considered as a separate supply from the rural scheme.

Competency

25 Do you agree with the proposal to include competency requirements?

Yes

Please provide any further comment in the box below: :

In principle, Council supports this proposal so that there is a good understanding of Acceptable Solutions, but we need more detail on what the Authority considers is appropriate training or experience to be sure it is realistic and affordable. We hope that these requirements are made available to businesses who wish to be considered for installing and maintaining end-point treatment.

Seeking feedback on other technical topics

26 Provide your comments below

Please provide any further comment in the box below: :

(No specific comments)

Seeking feedback on general matters

27 Te Mana o te Wai

Do you consider that the proposed changes will help to give effect to Te Mana o te Wai?:

Indirectly, perhaps. The required sampling and analysis of source water may point to water quality issues which need addressing in terms of the overall health of the water.

28 Guidance needs

What additional support is needed to help suppliers and property owners understand their responsibilities? :

The Discussion document notes several pieces of forthcoming guidance – the removing of some requirements for end-point treatments (page 10), circumstances warranting additional sampling of source water (page 12), on performance criteria especially on turbidity (page 13) and where more frequent monitoring is warranted (page 13). These are all important, and best conveyed as written fact sheets to the supplier (for subsequent distribution) and through webinars (subsequently posted on the Authority's website).

While we appreciate that the Authority cannot recommend any particular end-point treatment, guidance on the optimum characteristics would be helpful.

What topics would you like to see covered in guidance? :

(See above comment)

What format(s) would you like guidance to be provided in, e.g. written, webinars? :

(See above comment)

What channels should we use to get information to the people who need it?:

(See above comment)

29 Implementation concerns

Are there any barriers to adopting these changes and how can they be addressed?:

Council hopes that the time to register mixed-use rural supplies and implement the Acceptable Solution will be no less than those proposed in clause 309 the Local Government (Water Services) Bill – November 2028 (registration) and November 2030 (implementation). This would give time for Council to

consider available options and to implement them, potentially in consultation with the intended joint water services CCO being formed with other councils.

30 How Acceptable Solutions are presented

Is it better to have one Acceptable Solution that covers all three scenarios or is it better to keep them as separate documents?:

Council considers it preferable to have the proposed Acceptable Solutions presented as separate documents – or at least distinct sections within the same document. We support the Authority's intention to be agnostic on the source water type – as it is for mixed-use rural water supplies which can rely on surface water or a bore or a spring.

31 Challenges for your supply

Would the proposed approach to the changes create any challenges for your organisation? If so, what are they likely to be?:

The first challenge is understanding whether the quality of the source water for each of Rangitikei's mixed-use rural supplies is adequate for end-point treatment, to be achieved by a sampling and analysis by an IANZ accredited laboratory. We understand that the Authority would work with Council to determine the best way to get a sufficient quality. However, Council would also need to open discussions with any scheme with insufficient water quality about removing the drinking-water component, as Ōtorohanga District Council is currently doing with Arohena scheme.

For a scheme where the quality of the source water is suitable, Council will need to engage with consumers/owner of the properties to determine their view on having end-point treatment installed. This will be a cost to the scheme.

One final issue is the best way forward for the Omatane Hall, commented on above, particularly if the Authority does not accept the proposal to distinguish between frequent and infrequent use of buildings used for community purposes.

32 General comments

Do you have any general comments you'd like to make about the proposed changes?:

Council supports the Authority's intention to simplify and reduce the cost of implementing and maintaining Acceptable Solutions while minimising the risk to drinking water. However, it may still prove too expensive, meaning that Council will need to consider closing the drinking-water component of one or more of its mixed-use rural supplies.