

WESTLAND
District Council | Te Kahui o Poutini



Submission to the Department of Internal Affairs on the proposed amendments to the Non- financial Performance Measures Rules 2013 for Water Supply

1. Introduction

Thank you for the opportunity to share our feedback on the proposed changes to the Mandatory Non-financial measures for Water Supply.

Westland District Council (WDC) is a statutory entity based on the West Coast of the South Island of New Zealand.

Our vision statement is: *By investing in our people, caring for the environment, and enabling investment, growth and development we will enrich our district and the people that reside here.*

The Westland District is approximately 450 km in length and one of the most sparsely populated parts of New Zealand, with an area of 1,186,272 hectares and a population of 8,640 people (2018 Census, Stats NZ). Approximately 33% of the population (2,960) lives in Hokitika. The remaining 66% live in small villages and rural areas such as Ross, Franz Josef and Haast. The district has a focus on the outdoors and outdoor recreation (87% of the land area is DOC land), which is a tourism drawcard, alongside dairy farming, mining and other enterprises.

Council's relevant water treatment assets and treatment processes are as follows:

Assets

Asset component	Quantity
Treatment plants	9
Pump stations	2 Raw water; 1 booster
Reservoirs	45
Drinking water abstraction points	7 stream/river/creek intakes; 5 wells (bores); 2 other intakes (spring, lake etc.)

Water Supply Treatment

A range of Water Supply treatment processes have been implemented across the nine Water Supply schemes. These include:

- Chlorination
- Membrane filters
- Rapid sand filtration
- UV disinfection and/or
- Multimedia and cartridge filtration.

2. Submission

Proposed amendments to the Water Supply Mandatory Measures

The current sub part 1, performance measure 1 of the Mandatory Non-financial measure for Water Supply is not supported by current legislation. Reporting on separate measures to the public in the Annual Report and to Taumata Arowai is time-consuming and unrealistic for a small Council with limited staff resources.

We agree that Performance Measure 1 should be amended to reference the equivalent standards in the Water Services (Drinking Water Standards for New Zealand) Regulations 2022.

The current proposed change to Part (b) of Performance Measure 1 does not reflect what Councils are required to report to Taumata Arowai for protozoal compliance criteria. The proposed wording "Determinand – total pathogenic protozoa" implies that the samples must be taken to achieve compliance with the Mandatory Non-financial

performance measure. Whereas previously Councils had to prove compliance with the protozoal compliance criteria as set by the Water Regulator, which do not require proof of sampling. Any additional protozoal sampling would be onerous and expensive, and difficult to achieve.

As per the current wording, it would be more realistic for the protozoal measurement criteria in part (b) to be 'compliance with the protozoal compliance criteria'. This will reflect the reporting requirements to Taumata Arowai Water Services Regulator which will provide the public with relevant information while at the same time reducing the burden to report on separate performance measures across different documents.

General comments

The Taumata Arowai regulations such as Drinking Water Quality Assurance Rules and Network Environmental Performance Measures, cover the current Non-Financial Mandatory Measures and somewhat more. It is onerous and cost ineffective for Councils to report on both sets of measures, and as such, the Water Regulator regulations should be the one point of truth which Councils can direct queries to.

We support the submission from Taituarā regarding the usefulness of rules in their entirety. The points made are accurate and reflect this Council's experience in attempting to report on these performance measures. We agree that the measures do not achieve their intended purpose and are overdue for a substantive review.

3. Recommendation

Recommendation:

1. Amend the wording of Water Supply Performance Measure 1, part (b) to reference Sections 4.7.11, 4.7.2, 4.7.3, and 4.10.2 of the Drinking Water Quality Assurance Rules 2022.
2. Undertake a substantive review of the full suite of Non-Financial Mandatory Measures.

Ngā mihi nui,



Scott Baxendale, Group Manager District Assets