

Proposed changes to Level 3 Cyanotoxin Monitoring Rules

Where we propose a change to the rule type and reporting periods, we have made the text red to signify the change.

Existing Rule number	Existing requirement	Existing parameter	Proposed rule Number	Proposed requirement	Proposed parameter	Explanation	Question	Cost implications
T3.97	If cyanotoxins are identified in treated water, cyanotoxin testing must be undertaken in accordance with the supply cyanobacteria/cyanotoxin response plan or at least twice weekly (whichever is more frequent) until cyanotoxins are not present.	Monitoring CP: 1 Month RP: 1 Year	T3.CY.1	When cyanobacteria are identified in Class C or Class D source water at levels that exceed the limits set out in rule S3.CD.9, or if a treatment process is being used to remove cyanotoxins from source water, water leaving the treatment plant must be monitored monthly for the following cyanotoxins: (a) anatoxins: (b) cylindrospermopsins: (c) microcystins/nodularins (d) saxitoxins.	Monitoring CP: 1 Month RP: 1 Month	Currently, if cyanotoxins are identified in treated water, a supplier must carry out cyanotoxin testing in accordance with their cyanobacteria/ cyanotoxin response plan or at least twice weekly (whichever is more frequent). We propose removing the requirement to prepare a cyanobacteria/ cyanotoxin response plan from source water rules (see S3.CD.7). This proposed rule would require suppliers to monitor cyanotoxins monthly in treated water if: • cyanobacteria are identified in Class C or Class D source water (at a biovolume exceeding 0.25 mm³/L), or • they have a cyanotoxin removal process as part of their treatment.	Do you agree with this proposed rule on when cyanotoxin monitoring must be undertaken in treated water?	We anticipate that there will be reduced monitoring costs where cyanotoxins are identified in treated water.
T3.97	As above.	As above	T3.CY.2	If monitoring test results from T3.CY.1 exceeds 25% of the MAV for any of anatoxins, cylindrospermopsins, microcystins/nodularins and saxitoxins, water leaving the treatment plant must be monitored at the following frequencies: (a) every two weeks if any of the above cyanotoxins are between 25% and 50% of the respective MAV: (b) weekly if any of the above cyanotoxins are between 51% and 70% of the respective MAV: (c) twice weekly if any of the above cyanotoxins are between 71% and 85% of the respective MAV:	Monitoring CP: 1 Month RP: 1 Month	This proposed rule would base the sampling frequency of cyanotoxins on the level of cyanotoxins in treated water (as a percentage of their respective MAVs). This rule is intended to ensure that cyanotoxin sampling is proportionate to the level of cyanotoxins in treated water and cyanotoxins do not exceed their MAVS in treated water.	Do you agree with this proposed change to the sampling frequency of cyanotoxins?	We anticipate that there will be reduced monitoring costs where cyanotoxins are identified in treated water. There may be some cost increases for suppliers to monitor treated water for cyanotoxins if they are using a cyanotoxin treatment process.

				(d) daily if any of the above cyanotoxins are between 86% and 100% of the respective MAV.				
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