Water Services Authority
Taumata Arowai

Consultation on Drinking Water Quality Assurance Rules (Large Supplies)

Rules Review 2025 - Discussion Document

Contents

Introduction

Every day, drinking water suppliers play a critical role supporting the health and wellbeing of people across New Zealand by providing them with safe, reliable drinking water.

As the Water Services Authority we're committed to a future where everyone in New Zealand has safe water when they turn on the tap – and to taking a pragmatic, risk-based approach to get there.

Over the past 18 months, we've been working to make it simpler for drinking water suppliers to understand and follow requirements.

This time last year we published updated Drinking Water Quality Assurance Rules (the Rules) for supplies that serve 500 people or fewer. In September 2025 we published a set of improved Acceptable Solutions for rural and smaller suppliers.

These improvements have aimed to save suppliers time and effort – while ensuring they provide safe water for people to drink.

Proposing changes to reporting period and the Rules for large supplies

As a next step, we're seeking feedback on two Rules-related topics:

1. a proposed change to the reporting period for *all* rules – shifting from calendar year reporting to providing reporting by financial year starting from 1 July 2027
2. proposed changes to the Rules for supplies that serve 501 or more people, which focus on making these Rules clearer and easier to follow.

Supplier feedback received across our first four years as regulator and input from technical experts has informed this proposal.

We welcome your feedback on one or both topics.

Following consultation feedback and subsequent reissuing of the Rules in a clearer format, we are not intending to undertake a full review of the Rules for some time. The changes proposed are intended to set the Rules in place for a period of at least 10 years unless issues are identified that would require an update.

The aim of proposed changes to Rules for supplies that serve 501 or more people

- Make legal responsibilities clearer so that suppliers can be confident of the requirements they need to meet (e.g. by separating the Rules suppliers must follow from supporting guidance).
- Match treatment levels to the level of source water risk, based on the 'class' of source water you collect to treat. We've adjusted source water monitoring rules and proposed bacteria and virus treatment requirements for each source water class, building on the approach used to determine the protozoa treatment requirements in place now. This takes a more holistic approach to safe drinking water and recognises that higher quality source water that is protected from contamination can be more straightforward and efficient to treat.
- Establish clear, consistent approaches to give suppliers certainty about what's expected and make it more straightforward to meet requirements (e.g. by replacing the general requirement to create a cyanobacteria/cyanotoxin response plan with specific cyanobacteria/cyanotoxin monitoring rules).
- Remove treatment rules for treatment processes that are not being used.

- Standardise and simplify rules about chemicals used to treat water to make clearer what suppliers need to do (e.g. by ensuring suppliers have evidence that chemicals added to the supply are safe and streamlining monitoring).
- Make the requirement to add chlorine for residual disinfection purposes into a specific common rule (under the treatment rules module) to be consistent with the Water Services Act 2021 (the Act). The Rules would specify operational treatment requirements when adding chlorine for residual disinfection purposes and separate out the requirement for chlorine contact time.
- Make the Rules easier to understand and use by reformatting in line with new government best practice guidance, simplifying the wording and consolidating information where appropriate (e.g. by removing footnotes and tables of requirements from the Rules).
- Make Rules reporting easier for suppliers (e.g. by removing the need to report on some rules which don't have a direct impact on public health and changing monitoring reporting frequency for continuous monitoring).
- Require suppliers to promptly identify loss of pressure in distribution zones, by proposing a requirement to continually monitor pressure and meet specified pressure limits.
- Require the use of suitably qualified and experienced persons when making significant assessments under the Rules (e.g. when determining applicable source water classes).

How to make a submission

Your feedback during consultation is critical. It will inform decisions on the Rules reporting periods and the Rules for large supplies.

You are welcome to answer any consultation questions you like. Where possible, please include evidence to support your views (e.g. references to facts and figures or relevant examples).

We encourage you to provide feedback via the online survey.

We strongly encourage you to provide your feedback using the online survey as this will help save us significant time compiling and analysing feedback and allows for more accurate analysis of that feedback.

- Complete the online survey.
    - Note: if you start responding to this consultation online and want to return to it later, select the 'save and come back later' option at the bottom of the page to save your progress.

However, you can send us your responses to the consultation questions in the discussion document:

- by email at korero@taumataarowai.govt.nz.
- by post to Level 2, 10 Brandon Street, PO Box 628, Wellington 6140, New Zealand.

Please include your name, or the name of your organisation, and contact details in your submission. If you have questions about the submission process, please contact us at: korero@taumataarowai.govt.nz.

Timeframes

The consultation is open from Monday 10 November 2025 to Friday 19 December 2025. Please send us your submission on the proposals and questions raised in this document by 5.00pm on 19 December 2025.

Following the consultation period, we will analyse the feedback and finalise the Rules.

We plan to publish updated Rules on our website by April 2026.

Supporting information

In this document:

- **Appendix 1** provides a complete list of the consultation questions you will find highlighted in boxes throughout this document.
- **Appendix 2** provides a worked example of continuous monitoring non-compliance reporting.
- **Appendix 3** explains how we will use any information you provide as part of this consultation.

Consultation site

Visit the consultation site for more information and to submit your feedback.

Supporting documents:

Proposed new Rules

For technical detail, you can read the full text of the proposed new Rules.

Rules change tables

To assist your analysis and feedback on the proposed Rule changes, and potential implications for your supplies, we have produced change tables that show the current requirements, proposed changes (including rule type changes), why we are proposing changes, and a summary of costs. Change tables are available for:

- interpretation terms
- source water classes (including representative sampling and sanitary bore head requirements)
- general rules
- source water monitoring rules
- bacteria and virus treatment rules
- protozoa treatment rules
- chemical monitoring rules
- cyanotoxin monitoring rules
- distribution rules.

Rule summary list

You can also read a rule summary list, which is a codified list of reporting rule IDs for the current Rules and proposed Rules. This document provides a summary of any proposed changes to reporting requirements (e.g. a change in reporting period).

Current Rules

The current Rules are also available on our website.

We strongly recommend that you read the discussion document, proposed Rules, change tables, and rule summary list to help you to complete the online survey.

Principles applied across all Rules

We have used a set of principles to propose updates to all Rules for supplies that serve 501 or more people.

Principle	How we have done this
Respond to supplier feedback to make the Rules clearer.	• To respond to supplier questions, we currently have clarifications on the current Rules on our website. We've integrated these clarifications into this change proposal, so all the information suppliers need will be in one place. • So that suppliers can be certain they are meeting requirements, we have separated the Rules (things suppliers must do) from guidance (advice on how to meet requirements). To help make following the Rules easier, we also plan to progressively develop a library of practical 'how-to' resources throughout 2026.
Consolidate information and simplify formatting and wording to make Rules easier to understand and use.	• Updated the wording of rules to make them easier to understand. • Integrated footnotes and tables into related rules, so all the information suppliers need to understand what to do is included in a rule. • Updated rule numbering to make it clear to suppliers what parts of the Rules apply and what they need to report on. • The proposed numbering now directly refers to the specific sets of rules within modules. For example, for *Membrane (microfiltration/ultrafiltration) filtration rules [up to 4-Log],* the proposed new rule numbering is T3.PZ.M1 – T3.PZ.M4, where: T3 = Level 3 treatment rules PZ = Protozoa treatment rules M1-4 = Four separate Membrane filtration rules. • A significant benefit of the proposed new rule numbering is it will be easier to implement future rule changes because it will only require an update to the numbering in the specific rules module where the change is made.

You can provide feedback on formatting (e.g. proposed changes to rule numbering) through questions in the online survey.

Change in annual reporting timeframes

We are proposing to change the current Rules reporting year, currently January to December (calendar year), to July to June (financial year).

Over the past few years, councils have consistently raised concerns with us over the misalignment of reporting cycles between councils' annual reporting requirements and the Rules reporting requirements. Based on feedback from councils, we anticipate that aligning the Rules reporting requirements will likely produce efficiencies by reducing time and costs and reduce the reporting burden for councils.

If Rules reporting remains based on a calendar year, we anticipate the revised Rules being in effect from 1 January 2027. If a decision is made to move reporting to a financial year, updated Rules reporting would apply from 1 July 2027 to align with the financial year reporting cycle.

It is important to note that this proposed change would affect Level 1, Level 2 and Level 3 water suppliers.

We would like your feedback on the following questions:

- Do you agree with the proposal to change the current Rules reporting year, currently January to December (calendar year), to July to June (financial year)?
- Do you agree that if a change to financial year reporting is introduced, revised Rules reporting year should apply from 1 July 2027?
- Are there any implementation issues or impacts associated with changing to a financial year that you would like to provide feedback on?

Cost implications

We have considered the cost impacts of the proposed changes to the Rules. The proposed Rules changes aim to minimise compliance costs where possible, while ensuring suppliers provide good quality drinking water.

For most of the proposed Rules changes we don't expect any additional compliance costs for suppliers. You will need to consider the cost implications of specific rule changes depending on their applicability and significance for your supplies.

There are some unavoidable 'back-office' costs in the proposed changes to the Rules which will require updated or new recording and reporting systems.

You can provide feedback on the cost implications of specific rule changes, as well as the overall cost implications for your supply, through questions in the online survey.

Below is a summary of the anticipated cost implications of the proposed Rules changes:

Source water classes and rules

- The proposed new source water class (Class A) may provide considerable savings depending on your supply configuration as bacteria, virus and protozoa treatment won't be required.
- A few supplies would no longer be able to use representative sampling for their class of source water, and this will lead to a small increase in their costs.

- The proposed requirements for source water assessments from suitably qualified and experienced persons may result in some cost increases for some suppliers, though most suppliers already use external providers for these assessments.
- There will be small one-off costs for some supplies with groundwater sources who need to install continuous monitoring infrastructure.
- We anticipate there will be reduced costs for suppliers monitoring source water for indications of cyanobacteria because of the simplified approach.
- There may be some cost savings from the proposed source water monitoring rules as they are simpler than current requirements.

Protozoa rules

- The protozoa rules align with proposed changes to source water classes. We anticipate these changes won't have a cost impact on suppliers, but we want your feedback on these changes.

Bacterial and virus rules

- As Class A source water will not require bacteria and virus treatment, there may be considerable cost savings for suppliers depending on supply configuration.

Chemical rules

- The proposed chemical rules may increase costs for some suppliers as they will be required to monitor monthly all chemicals used for water treatment and chemicals that may form in the treatment process.
- There may be small costs for some suppliers to demonstrate that chemicals dosed in the supply are safe for use.

Cyanotoxin rules

- 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.

Distribution rules

- The addition of a new pressure monitoring rule will have cost implications for suppliers who have not installed the pressure monitoring in their networks. We understand that many suppliers are already monitoring pressure in their distribution zones.

Costs related to changes to reporting rules

We have had a preliminary discussion with two data service providers on the potential costs of the proposed Rules changes. They have provided us with estimates of the costs involved. The costs could vary from a few thousand to tens of thousands depending on the number of supplies each supplier operates and the approach the supplier takes to reporting.

There will be an increase in reporting requirements as suppliers will need to supply data from continuous monitoring of non-compliance. We consider this reporting rule change (rule G.RR.4) will result in the most significant cost increase for suppliers.

If you have a data service provider, they will be able to provide information on likely one-off and ongoing costs based on the:

- number of supplies a supplier is responsible for
- proposed revised Rules.

Your responses to our questions in the online survey will inform our assessment of costs.

Rule type changes

Reduced reporting requirements in some areas

To simplify and reduce reporting requirements where appropriate, we have made some changes to rule types for proposed new rules. For example, where we do not require information to be routinely supplied to us by suppliers, we have changed the proposed rule type to non-reporting from an existing monitoring or assurance rule type. Suppliers are still expected to comply with the requirements of the rule and evidence of compliance would need to be demonstrated if required.

Please refer to the corresponding Rules change table and the rule summary list for details of each proposed change to rule types. Where we propose a change to the rule type and reporting and compliance periods, we have made the text red in the change tables to signify the change.

While we are not asking specific questions for each proposed change to rule type, you can provide feedback on proposed changes through questions in the online survey.

Continuous monitoring rules – reporting period

We are proposing to simplify reporting by requiring that all monitoring rules that require continuous monitoring must be reported on monthly, within 20 working days of the end of each month.

This responds to feedback we have received from some suppliers that reporting more frequently would reduce the burden of annual reporting by spreading analysis and reporting throughout the year. This will also assist us with understanding compliance with the Rules.

We are seeking your feedback on the proposed reporting period change via a specific question in the online survey (proposed rule G.RR.4).

Continuous monitoring non-compliance reporting

We do not currently collect the data we need to accurately assess whether treatment barriers are operating effectively and whether a supply is non-compliant with the Rules.

We propose changes to continuous monitoring reporting to improve our understanding of the safety of drinking water and non-compliance with the Rules.

The proposed rule G.RR.4 sets out changes to reporting requirements around continuous monitoring. Currently the Rules require suppliers to report all continuous monitoring data. However, we only ask suppliers to tell us the number of non-compliant periods they had when monitoring continuously (i.e. how many days in a month the supply was not compliant). We propose changing this rule so that suppliers will only need to report to us results of non-compliant monitoring.

This change will involve specifying the timeframes for each day that each treatment process for the supply was non-compliant and what the minimum and maximum ranges were of the non-compliant values. Suppliers will still need to report to us on whether they complied with each monitoring rule. Suppliers will not need to provide us with data for times when the supply processes were compliant with the Rules.

The proposed change will help us in the following ways.

- Provides the data we need to assess whether treatment barriers are operating effectively and whether the supply is non-compliant with the Rules. For example, if a supply is reporting against UV and chlorination rules and has a treatment failure, knowing exactly when the failure happened allows us to determine whether at least one barrier was operating effectively or if both failed. This is particularly relevant for protozoa where a source requiring 3-log protozoa treatment may have two 3-log treatment processes in place and one fails but the supply continues to be compliant.
- Aligns the data we collect with similar reporting requirements for the results of E. coli monitoring or monitoring for lead in distribution system. For example, continuous monitoring data for turbidity provides evidence that a protozoa barrier is working effectively and when results exceed a turbidity limit the extent of that exceedance provides information about the level of risk.
- Enables both us and the supplier to carry out an accurate assessment of the length and frequency of non-compliance.
- Allows for more accurate reporting against the Rules in our Drinking Water Regulation Reports, such as whether treatment barriers are operating effectively. Currently, we analyse performance against the Rules rather than compliance, due to limitations in the way that data is reported.

Please see **Appendix 2** for a worked example of continuous monitoring non-compliance reporting.

We are seeking your feedback on the proposed reporting change via a specific question in the online survey (proposed rule G.RR.4).

Interpretation terms

To make the Rules easier to understand and follow, we've proposed defining terms at the beginning of the Rules. We are also proposing to remove specific definitions in the current Rules that we have assessed as not needing to be defined in the Rules, e.g. are already defined in the Act. These changes are in line with government best practice. Please refer to the interpretations section change table for the specific proposed changes and reasons for the changes.

You can provide feedback on the proposed changes through a question in the online survey.

Proposed changes to Level 3 Rules

This section covers proposed rule changes where we want your feedback. The rationale for the proposed changes is included with accompanying questions. The proposed rule changes, rationale and questions are also included in the individual Rules change tables.

It is important to note that this section does not cover all the proposed rule changes. Only those changes where we are requesting specific feedback are included. We strongly recommend that you read the proposed revised Rules, Rules change tables and rule summary list documents to understand all the proposed changes.

It is important that suppliers consider all the proposed changes relevant to their supplies and give feedback where necessary. There are general questions at the end of the online survey where you can include feedback on any proposed rule changes not covered by specific questions.

Level 3 Source water classes

The existing Level 3 Rules use source water classes to determine treatment requirements for protozoa, and to determine source water monitoring for some determinands and parameters. We propose expanding the source water class approach to make explicit the source water monitoring rules and bacteria and virus treatment rules that apply to each source water class.

This change is intended to make it easier for suppliers to identify what source water monitoring they need to do and what treatment barriers they need to have in place based on the type of source water they are using.

Four source water classes are proposed (including two interim classes).

We would like your feedback on the following question.

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

Class A and Class A (Interim) source water

The proposed Class A source water is for groundwater abstracted from a depth of greater than 30 metres that is highly unlikely to be contaminated with bacteria, viruses or protozoa. Suppliers will not be required to have treatment barriers in place for these contaminants, although chlorine will need to be added at the treatment plant to provide residual disinfection.

Class A (Interim) is source water that is likely to be Class A, but the supplier has not yet undertaken the monitoring to demonstrate that the source water meets the necessary criteria for Class A. The timeframe of 24 months to establish Class A comes from existing requirements for Interim Class 1 status.

Representative sampling may be used to determine Class A and Class A (Interim) source water (see proposed rule 7 and rule S3.AB.2).

Why is Class A source water required?

There is very clear evidence that groundwater abstracted from greater than 30 metres is highly unlikely to be contaminated with protozoa or bacteria. The evidence is less clear about the presence of viruses in groundwater abstracted from greater than 30 metres. Research we have recently commissioned indicates the viral risk is negligible.

The proposed Class A source water provides a new option for suppliers that want to demonstrate that their source water is not contaminated with protozoa, bacteria or viruses. This will allow them to avoid the cost of installing UV disinfection or chlorine contact time infrastructure that is required when chlorine is used to control bacteria and viruses. Chlorine is still required to be added to these supplies to ensure that water distributed in a network contains residual chlorine.

Under the previous Ministry of Health Standards, Drinking Water Standards for New Zealand 2005 (R2018) and the current Rules, chlorine contact time is required. The chlorine contact time required for bacterial control is significantly less than that required for virus control. The contact time requirement in the existing Rules is set at a level to control viruses and is included in the bacteria treatment rules because there are no separate virus rules. The convention of including a virus rule within bacterial rules is common in other jurisdictions.

We are therefore proposing where there is a very low risk of enteric virus contamination in groundwater sources, suppliers will be able to have their source water classified as Class A and not be required to provide a virus treatment process.

Assessment of virus risk

Rather than specifying a viral indicator limit and monitoring frequency in the Rules, we propose requiring suppliers to demonstrate via an enteric viral indicator monitoring programme that a health-outcome target of 1 enteric viral infection/10,000 people/year can be achieved and maintained for the supply.

This proposed microbial health-outcome target is based on the United States Environmental Protection Agency (USEPA) target of 1 infection/10,000 people/year which is considered internationally to be an acceptable annual risk for microbial infections attributable to drinking water.

Due the importance of this monitoring programme, we propose requiring an independent suitably qualified and experienced person to prepare the monitoring programme.

The reasons for this proposed approach are set out below.

- Internationally there is insufficient scientific consensus on the best indicator of viral contamination in source waters. There are several possible viral indicators that can potentially be used, each with different advantages and disadvantages. We propose allowing the supplier, in consultation with experts, to determine the most appropriate viral indicator for their circumstances to demonstrate that the health-outcome target can be achieved.
- The specific characteristics of each supply (including the number of people exposed and chlorine contact time that can be achieved in water mains) can affect the calculation of a health-outcome target. These factors also affect the determination of the sampling frequency necessary to demonstrate that a health-outcome target is being achieved.

We would like your feedback on the following questions.

- Do you agree with the proposal that Class A source water will not require primary treatment for bacteria, viruses or protozoa (though they will still need to add chlorine to provide a residual)?
- Do you agree with the proposed requirement for an enteric viral monitoring programme to demonstrate a health-outcome target for viral risk can be met?
- Do you agree with the proposed health-outcome target of one enteric viral infection/10,000 people/year?

- Do you agree with the proposed requirement that an independent suitably qualified and experienced person must prepare a written report demonstrating that the health-outcome target can be achieved and maintained for the supply?
- Do you agree with the proposed criteria included in Class A (Interim) to establish Class A source water?
- Do you agree with the 24-month timeframe for establishing Class A source water?

Class B and Class B (Interim) source water

The proposed Class B and Class B (Interim) source water classes are based on the current Rules' Class 1 and Interim Class 1. Class B is for source waters where the risk of virus contamination has not been established and therefore the source water cannot be classified as Class A. These source waters will not require a protozoa treatment barrier but will require a bacteria and virus treatment barrier. Chlorine will still be required to be added at the treatment plant for residual disinfection purposes.

Class B (Interim) is for source water that is likely to be classified as Class B but the supplier has not yet undertaken the monitoring to demonstrate that the source water meets the criteria necessary for Class B.

Representative sampling may be used to determine Class B and Class B (Interim) source water (see proposed rule 7 and rule S3.AB.2).

We would like your feedback on the following questions.

- Do you agree with the proposed criteria for demonstrating Class B source water?
- Do you agree with the proposed criteria included in Class B (Interim) for establishing Class B source water?
- Do you agree with the 24-month timeframe for establishing Class B source water?

Source water contamination assessments

We are also proposing for Class A, Class A (Interim), Class B and Class B (Interim) source water that the supplier must undertake an assessment immediately if any monitoring result (including from source water rules monitoring) indicates potential contamination or that the groundwater has been compromised.

We would like your feedback on the following question.

- Do you agree with the proposed assessments for Class A, Class A (Interim), Class B and Class B (Interim) source water if any monitoring result indicates potential contamination or the groundwater source has been compromised?

Class C source water

The proposed Class C covers source waters that have a low level of protozoa contamination risk. Class C is based on the current Rules but has been expanded to include groundwater abstracted from

greater than 30 metres (if it is not classified as Class A or Class B source water), roof collected water, and spring water that is not under the influence of surface water.

Class C also includes Class D source water that has been reclassified as Class C where an assessment has demonstrated a low level of protozoa contamination risk. This assessment needs to be repeated at least every five years to account for potential changes in catchment risks and requires a written report from a suitably qualified and experienced person.

Class C requires supplies to have a protozoa treatment barrier (3-log treatment) and a bacteria and virus treatment barrier. Chlorine will need to be added at the treatment plant for residual disinfection purposes.

We would like your feedback on the following questions.

- Do you agree with the criteria for Class C source water?
- Do you agree that an assessment to reclassify a Class D source water to Class C should only be undertaken by a suitably qualified and experienced person?

Class D source water

The proposed Class D source water is similar to the current Class 3 status. Class D is the default class for surface waters and spring or shallow groundwater (<10m) that is considered higher risk. This source water class requires a protozoa treatment barrier (4-log treatment) and a bacteria and virus treatment barrier. Chlorine will need to be added at the treatment plant for residual disinfection purposes.

We would like your feedback on the following question.

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

General rules module

Reporting rules

G.RR.4

This proposed rule separates continuous monitoring reporting requirements from grab sample monitoring reporting. Grab sample monitoring reporting is covered in a separate reporting rule (G.RR.5).

Reporting frequency

We are proposing simplifying reporting by requiring that all monitoring rules that require continuous monitoring must be reported on monthly, within 20 working days of the end of each month.

We have received feedback from suppliers that they would like to report more frequently so that annual compliance reporting is less onerous, and they can spread the compliance reporting throughout the year.

Reporting requirements

Currently we ask suppliers to tell us the number of non-compliant periods they had when monitoring continuously. We propose changing this rule so that suppliers will need to provide the results of non-compliance. This will involve specifying the timeframes for each day the supply was non-compliant and what the minimum and maximum ranges were of the value. Suppliers will still need to report to us on whether they complied with each monitoring rule. We are proposing this change to improve our understanding of the safety of drinking water, including whether a supply has sufficient barriers in place and the effectiveness of those barriers.

Our assessment is that this change can apply to the following rules, though only some of these rules will be applicable to each water supply depending on the compliance options they use.

Rules affected by changes to continuous monitoring requirements						
S3.AB.6	S3.CD.1	T3.BV.C4	T3.BV.F2	T3.BV.Z2	T3.BV.U4	T3.BV.U5
T3.BV.U6	T3.PZ.D3	T3.PZ.F3	T3.PZ.F6	T3.PZ.F9	T3.PZ.X3	T3.PZ.M2
T3.PZ.Z2	T3.PZ.U4	T3.PZ.U5	T3.PZ.U6	T3.CH.6	D3.PM.2	D3.RD.3 (optional)

Please refer to **Appendix 2** for a worked example of continuous monitoring non-compliance reporting.

We would like your feedback on the following questions.

- Do you agree (for all applicable rules) with the change to make all continuous monitoring rules reported on a monthly basis?
- Do you agree with non-compliance reporting for non-compliance with continuous monitoring rules?
- Are there any cost implications for you from this proposed change?
- If there are costs - will these be internally or from purchasing services?

G.RR.5

This proposed rule covers the requirements for grab sample monitoring reporting.

The rule sets out the reporting timeframes for rules that require grab samples for either one month or one year compliance periods. Suppliers must report results within 20 days of the end of the month or within 40 days of the end of the year, depending on the compliance period. Suppliers may report the results earlier if they choose.

We would like your feedback on the following questions.

- Do you agree with including a rule that sets out the requirements specific to grab sampling for monitoring rules?
- Do you agree with changing some reporting that is currently annual into monthly reporting?

Continuous monitoring rules

G.CM.3

This proposed rule covers supplementary testing options when continuous monitoring equipment fails. It only applies to Level 3 source water and distribution rules. A supplier will be able to take one grab sample for up to 24 hours of lost continuous monitoring data, for a maximum of 48 hours.

We would like your feedback on the following question.

- Do you agree with the 24-hour grab sample time proposed to account for the missing source water or distribution zone continuous monitoring data with a limit of up to 48 hours?

G.CM.4

This proposed rule increases the time period that grab sampling can be used to verify compliance with Level 3 treatment rules (from 30 minutes to 60 minutes) when continuously monitored data cannot be recorded.

This responds to feedback we have received from some suppliers that 30 minutes is not enough time to get continuous monitoring equipment running after it fails.

We would like your feedback on the following question.

- Do you agree with the 60-minute grab sample time proposed to account for missing treatment continuous monitoring data?

Level 3 Source water monitoring rules module

Source water common rules

S3.CR.1

This proposed rule requires suppliers to determine source water classes based on the class criteria set out in rule 8. The source water class determines what protozoa, bacteria and virus rules the supplier needs to comply with.

This rule also introduces a new requirement that the source water class of each source must be determined by a suitably qualified and experienced person. This assessment could be undertaken as part of the supply source water risk management plan.

We would like your feedback on the following questions.

- Do you agree that an assessment to classify a source water class should only be undertaken by a suitably qualified and experienced person?
- Would there be any cost implications for your organisation?

Class A and Class B source water rules

S3.AB.1

This proposed rule introduces a new requirement that a written assessment to demonstrate a sanitary bore head must be undertaken every five years by a suitably qualified and experienced person.

This proposed rule would require suppliers to report each year on whether the sanitary bore head meets requirements. However, the assessment only needs to be completed every five years.

We would like your feedback on the following questions.

- Do you agree that an assessment to demonstrate a sanitary bore head should only be undertaken by a suitably qualified and experienced person?
- Would there be any cost implications for your organisation?

S3.AB.2

This proposed rule sets out when representative sampling can be used if the sampling meets the requirements for representative sampling set out in rule 7. Representative sampling is currently permitted for all groundwater sources under the Rules but would only be permitted for Class A, Class A (Interim), Class B and Class B (Interim) source water under the proposed changes.

Evidence indicates that representative sampling is not appropriate for groundwater abstracted from <30 metres. We are aware of some suppliers making decisions regarding the use of representative sampling without satisfactory evidence or adequate written documentation to demonstrate that bore water is representative of water from a different bore. We propose tightening the representative sampling criteria.

We also propose removing the existing limit of six bores (footnotes 29 and 30) as specific source water characteristics may allow representative sampling to include more than six bores.

We would like your feedback on the following questions.

- Do you agree with only allowing representative sampling for Class A, Class A (Interim), Class B and Class B (Interim) source water?
- Do you agree with the proposal to remove the six bore limit for representative sampling?

S3.AB.4

To establish Class A or Class A (Interim) source water, suppliers must demonstrate that the source water does not contain enteric viruses at a concentration that would result in an exceedance of the health-outcome target.

This proposed rule would require the supplier to continue to monitor the groundwater source at a frequency determined by the enteric viral monitoring programme. The supplier can choose which viral indicator to use as determined by their monitoring programme.

We would like your feedback on the following question.

- Do you agree with the frequency for testing for a viral indicator being determined by the supplier's enteric viral monitoring programme?

S3.AB.5

This proposed rule would require monthly monitoring of Class A, Class A (Interim), Class B and Class B (Interim) source water for iron, manganese and nitrate, the same as current Rules requirements. However, we are proposing to remove the requirement to monitor for colour as it is unlikely to be associated with Class A, Class A (Interim,) Class B, and Class B (Interim) source water.

We would like your feedback on the following question.

- Do you agree with the removal of the requirement to monitor for colour for Class A, Class A (Interim), Class B and Class B (Interim) source water?

S3.AB.6

This proposed rule will require all Class A, Class A (Interim), Class B and Class B (Interim) source water to be monitored continuously for conductivity, pH and turbidity as this is considered best practice. The majority of suppliers should already have continuous monitoring equipment installed and it is our understanding that any remaining suppliers are planning to install continuous monitoring equipment by the end of 2027.

It is important to note that continuous monitoring for pH and turbidity can be post treatment if the supply does not have filtration or pH adjustment treatment processes prior to the proposed sampling location. Conductivity monitoring would need to be installed pre-treatment.

In the current Rules, footnote 39 allows water abstracted from more than one source and combined at the treatment plant to be monitored for conductivity, pH and turbidity. We intend to continue to allow this but will include this information in guidance for Level 3 Rules.

We would like your feedback on the following questions.

- Do you agree with requiring continuous monitoring for conductivity, pH and turbidity for Class A, Class A (Interim), Class B and Class B (Interim) source waters?
- Would there be any cost implications for your organisation?

S3.AB.7 and S3.CD.4

These proposed rules add the following determinands to the existing determinands that must be monitored at least annually in all source water.

- **Boron**

  Boron occurs naturally in some groundwater sources and groundwaters in geologically volcanic areas can contain boron at high concentrations. There is an existing MAV for boron.

- **Fluoride**

  Fluoride can occur naturally in source waters and elevated levels of fluoride can be present in some groundwater in geologically volcanic areas. There is an existing MAV for fluoride.

- **Hardness**

  It is important that water suppliers know the level of hardness in their source waters to allow management of hardness levels appropriate for the supply.

We propose removing the following determinands that must be monitored at least annually.

- **Barium**

  Barium is not considered a determinand of concern in New Zealand source waters.

- **Calcium and magnesium**

  Calcium and magnesium have no identified MAVs. While calcium and magnesium are contributors to hardness, it is proposed that hardness will be required to be measured separately.

We would like your feedback on the following questions.

- Do you agree with the proposed addition of boron, fluoride and hardness?
- Do you agree with the proposed removal of barium, calcium and magnesium?

S3.AB.9

This proposed rule would only require testing for radiological determinands for Class A, Class A (Interim), Class B and Class B (Interim) source water (rather than for all groundwater sources under the current Rules).

Radiological determinands have not been identified in source waters in New Zealand and it is considered highly unlikely that they will in the future. For this reason, we have changed this reporting rule to non-reporting. Any MAV exceedances would still be required to be reported to the Authority.

We would like your feedback on the following question.

- Do you agree that testing for radiological determinands should only be required for Class A, Class A (Interim), Class B and Class B (Interim) source waters?

Class C and Class D source water rules

S3.CD.6

Currently, suppliers must categorise all water sources as either low-risk, medium-risk or high-risk for the presence of cyanobacteria.

The proposed change would require suppliers to assess whether cyanobacteria are likely to be present in Class C and Class D water sources. This assessment must be undertaken every five years by a suitably qualified and experienced person.

This change is proposed because an assessment of cyanobacteria risk is more extensive and is therefore more appropriately included in the supply source water risk management plan.

We would like your feedback on the following questions.

- Do you agree with the change to an assessment of the likelihood of the presence of cyanobacteria in source water and moving the assessment of cyanobacteria risk to the source water risk management plan?
- Do you agree that the likelihood assessment should only be undertaken by a suitably qualified and experienced person?

S3.CD.7 and S3.CD.8

These proposed rules prescribe actions that are required for source waters where there is a medium or high likelihood of planktonic or benthic cyanobacteria. They replace the requirement to prepare a cyanobacteria/cyanotoxin response plan but include simplified actions that should have been included in a supplier's response plan. Cyanobacteria and cyanotoxins will still need to be considered in the source water risk management plan and drinking water safety plan for the supply. Including the requirement for a response plan in the Rules arguably duplicates other legislative requirements.

The intention of these proposed rules changes is to require suppliers to identify if cyanobacteria are likely in the source water and, if so, require testing of treated water for cyanotoxins, removing the current complex requirements for source water testing.

If suppliers use a cyanotoxin removal treatment process as part of their drinking water treatment, we are proposing that they will not have to undertake source water cyanobacteria biovolume monitoring. However, they will have to monitor for the presence of cyanotoxins in post-treatment water to meet the cyanotoxin monitoring rules requirements.

We would like your feedback on the following questions.

- Do you agree with the change from requiring suppliers to prepare a cyanobacteria/ cyanotoxin response plan to prescribing monitoring?
- Do you agree with the requirements to monitor cyanobacteria biovolume when source waters have a medium or high likelihood of planktonic or benthic cyanobacteria being present?
- Do you agree that suppliers do not need to undertake monitoring of source water for planktonic or benthic cyanobacteria if they have a cyanotoxin removal process as part of their treatment?

S3.CD.9

This proposed rule prescribes a source water cyanobacteria biovolume threshold at which monitoring for cyanotoxins post-treatment is required. The cyanobacteria biovolume threshold was selected after consultation with cyanobacteria/cyanotoxin experts and consideration of thresholds in other jurisdictions.

We would like your feedback on the following question.

- Do you agree with the cyanobacteria biovolume threshold prescribed for initiating cyanotoxin monitoring in treated water?

S3.5 (existing rule) - remove

We consider that the existing requirement to undertake additional monitoring of source waters either during or immediately after an event which could adversely affect source water quality is better included in guidance and the supply source water risk management plan.

We would like your feedback on the following question.

- Do you agree with the proposed removal of additional event-based monitoring of Class C and D source waters from the Rules?

Footnotes 33, 36 and 40 (existing footnotes) - remove

We propose removing these footnotes and instead provide guidance on the collection of samples.

We would like your feedback on the following question.

- Do you agree with the proposed removal of footnotes on the collection of samples from the Rules?

Level 3 Treatment rules module

Bacteria and virus treatment rules

Combined bacteria and virus rules

In 2008, the Ministry of Health included a section heading for viral compliance requirements in the Drinking Water Standards for New Zealand 2005 (R2008), signalling its intention to prepare requirements for suppliers to provide virus barriers at water treatment plants. Ultimately these requirements were not included in the Ministry of Health Standards or in the current Rules.

We have assessed whether separate virus rules are required in the Rules and propose extending the existing bacteria rules to include virus treatment process requirements. This does not require the addition of any new treatment processes as the current bacterial treatment processes are considered effective to adequately control viruses in drinking water.

T3.BV.C2

This proposed rule sets out the options that suppliers have for bacteria and virus treatment processes.

We propose removing chlorine dioxide as a treatment option as we are only aware of one supply that currently uses this process. It is our understanding that the supplier is intending to discontinue use of chlorine dioxide.

We also propose removing the requirement for Self-supplied buildings that provide water to more than a single building to use chlorine. This change aligns with recent changes to Level 2 Rules. Self-supplied buildings will still be required to have treatment processes for microbiological contaminants.

We would like your feedback on the following questions.

- Do you agree with removing chlorine dioxide as an option for bacteria and virus treatment?
- Do you agree with removing the requirement for Self-supplied buildings providing water to more than one building to use chlorine?

Protozoa treatment rules

T3.PZ.C3

This proposed rule sets out the protozoa treatment processes and the associated log credits that can be achieved. We are proposing to remove some of the existing protozoa treatment process options. The rationale for removal of the treatment options is outlined below.

- ***Remove*** *Coagulation, flocculation and sedimentation process without filtration [0.5-log]*

  We are not aware of any suppliers using this process without filtration so propose removing this option.

- ***Remove*** *Coagulation, flocculation and direct filtration [3.0-3.5-log]*

  We propose removing the option for suppliers to achieve 3.0 log and 3.5 log credits for the current coagulation, flocculation and direct filtration process. It is our understanding that all suppliers using direct filtration also use UV disinfection to achieve the required log credits. We do not consider removing these rules will have any adverse impacts on suppliers.

We also propose removing the reference to flocculation as a direct filtration process does not usually have a flocculation step after the addition of a coagulant.

We would retain a coagulation and direct filtration option to achieve 2.5-log credits.

- ***Remove*** *Second stage filtration [0.5-log]*

  We are not aware of any suppliers using second stage filtration to achieve log credits so propose removing this option.

- ***Remove*** *Slow sand filtration [2.5-log]*

  We are not aware of any suppliers using slow sand filtration to achieve log-credits so propose removing this option.

We would like your feedback on the following questions.

- Do you agree with removing the coagulation, flocculation and sedimentation process without filtration process option?
- Do you agree with removing the current coagulation, flocculation and direct filtration process option for achieving 3 log and 3.5 log credits?
- Do you agree with removing the reference to flocculation in the current coagulation, flocculation and direct filtration process?
- Are you using coagulation and direct filtration to achieve 3 log or 3.5 log credits?
- Do you agree with removing the second stage filtration process option?
- Do you agree with removing the slow sand filtration process option?
- Will removing these options create any challenges for your organisation?

T3.PZ.C5

This proposed rule sets out the requirements regarding the recycling of treatment process water.

The rule clarifies that untreated waste streams cannot be recycled to the head of the plant without treatment and that water diverted as filter to waste can be either recycled or stored and used directly for backwash. Previously the rule indicated that filter to waste water had to be discarded though this was not the intention.

The rule also gives more flexibility to suppliers who cannot meet existing recycling requirements because of their plant design, by allowing more options for flow equalisation of recycled water flow rate.

We would like your feedback on the following question.

- Do you agree with the proposed changes for managing recycled water at treatment plants?

T3.PZ.C6

This proposed rule applies to all filtration processes and requires that water leaving a filter when it is in operation must have lower turbidity than water entering a filter. We are aware of situations where filters that are in use have not been working effectively.

We would like your feedback on the following question.

- Do you agree with the inclusion of this rule about the turbidity of filtered water?

T3.PZ.X4

We propose removing the option for filtration cartridges that must be certified to use a standard recognised by the Authority as being equivalent (AS/NZS 4348:1995 in conjunction with AS/NZS 3497:1998 (updated 2001)).

We would like your feedback on the following question.

- Do you agree with the removal of the option to use AS/NZS 4348:1995 in conjunction with AS/NZS 3497:1998 (updated 2001)?

Chemical monitoring rules

T3.CH.1

This proposed rule is intended to ensure suppliers know the quality of the chemicals they are dosing into their treatment processes by demonstrating that the chemicals are safe to use. The rule specifies documentation that the supplier must obtain to prove that the chemicals are safe to use in drinking water.

We would like your feedback on the following questions.

- Do you agree with requirements for suppliers to demonstrate that chemicals dosed into drinking water are safe for use?
- Will meeting the requirements of this proposed rule create challenges for your organisation?

T3.CH.2

Currently, suppliers must carry out testing in the first 12 months of sampling to determine whether specified chemicals used in treatment have standard or elevated values. This testing is carried out to determine a supplier's monitoring regime.

The proposed rule:

- consolidates an existing rule and related material into a single rule
- removes the requirement to carry out testing for 12 months to determine typical or elevated values of chemicals
- requires suppliers to create a schedule of all chemicals used for treatment and specify which of those chemicals has a MAV.

We would like your feedback on the following question.

- Do you agree with this proposed rule requiring preparation of a schedule of chemicals used in treatment?

T3.CH.3

This proposed rule would require suppliers to monitor monthly all the chemicals they use in the treatment process that have a MAV, and any chemicals that may be formed in the treatment process (except for chlorine and fluoride).

We propose requiring ongoing monthly monitoring as the concentration of a treatment chemical can change depending on the quality of the source water or changes in the treatment process. Annual monitoring is not considered a sufficient frequency to identify these potential changes.

We would like your feedback on the following question.

- Do you agree with the increase in monitoring frequency to monthly for chemicals that were previously determined to have standard values?

T3.96 (existing rule) - remove

We propose removing this rule as event-based monitoring should be part of a response to an event and set out in the supply's drinking water safety plan. Events that could adversely affect the supply need to be managed by the supplier and any additional monitoring needs to be determined at the time and in relation to the specific event.

We would like your feedback on the following question.

- Do you agree that the requirement for event-based monitoring should be removed from the Rules and managed by the supplier on a case-by-case basis?

Cyanotoxin monitoring rules

T3.CY.1

This proposed rule specifies when cyanotoxin monitoring must be undertaken in water leaving a treatment plant. 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
- they have a cyanotoxin removal process as part of their treatment.

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.

We would like your feedback on the following question.

- Do you agree with this proposed rule on when cyanotoxin monitoring must be undertaken in treated water?

T3.CY.2

This proposed rule bases the sampling frequency of cyanotoxins on the level of cyanotoxins identified 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.

We would like your feedback on the following question.

- Do you agree with this proposed change to the sampling frequency of cyanotoxins?

Level 3 Distribution rules module

Pressure monitoring rules

D3.PM.1

This proposed rule requires continuous pressure monitoring in distribution zones (excluding trickle feed supplies). It is our understanding that many suppliers are currently monitoring pressure in distribution zones. This is considered good practice as a drop in pressure is an indicator of potential ingress of contamination. Evidence exists that low pressure events can lead to contamination of water supplies which may cause significant illness outbreaks.

We propose that a supplier must monitor at a site representative of normal distribution zone pressure and at a site representative of the lowest pressure.

We would like your feedback on the following questions.

- Do you agree with the proposal to require continuous monitoring of pressure in distribution zones?
- Do you agree with the requirements of the proposed rule?
- Do you currently have pressure monitoring in place in any of your distribution zones?
- Are there any cost implications for you of this proposed change?

D3.PM.2

This proposed rule sets out the pressure limits that suppliers would have to achieve in their distribution zones. The pressure limits have previously been used in New Zealand through the Ministry of Health's Public Health Grading of Drinking Water Supplies and the Fire Service Code of Practice. The limits are also consistent with pressure limits used internationally.

We would like your feedback on the following question.

- Do you agree with the proposed pressure limits in distribution zones?

Residual disinfection/disinfection byproducts and plumbosolvent metals rules

D3.RD.1

This proposed rule has been rewritten to clarify the requirements for monitoring Free Available Chlorine (FAC) in a distribution zone.

We propose retaining the option for suppliers to carry out both grab sampling and continuous monitoring for FAC in distribution zones. However, there is an argument that continuous monitoring should be a requirement in all distribution zones as it can give a real time indication of issues.

We would like your feedback on the following questions.

- Do you agree with the proposed rule on monitoring Free Available Chlorine (FAC) in a distribution zone?
- Do you agree with meeting compliance requirements by using either continuous or grab sampling options?
- Do you agree that continuous monitoring of FAC should be required for all distribution zones?

Seeking feedback on other matters

To ensure the proposed changes to the Rules are fit for purpose, we also invite additional feedback on the following matters.

- **Rule type changes**

  Do you have any comments on the proposed rule type changes or changes to reporting frequency?

- **Interpretation changes**

  Do you agree with the proposed changes to the definitions in the interpretation rules?

- **Costs for your organisation**

  Do you agree with our assessment of the cost implications of the proposed Rules changes?

  Do you have any comments on the cost implications of the proposed Rules changes?

- **Formatting changes**

  Do the proposed changes make it easier to follow the Rules?

  Do you agree with the revised Rules numbering system?

  Do you have any comments on the proposed formatting changes?

- **General comments**

  Do you have any comments on any other proposed rule changes?

  Do you have any general comments you would like to make about the proposed changes?

Next steps

Following this consultation, the Authority will revise and reissue the Rules taking into account feedback received.

We have included a list of all the questions we ask through our consultation site in Appendix 1 of this document to help you prepare submissions. However, we ask that, if possible, you use the online consultation site to make your submission as that makes it easier for us to analyse the submissions received

Please provide your feedback on these proposed changes by 5pm, Friday 19 December 2025.

Appendix 1: Consultation questions

This discussion paper includes questions that you may like to respond to in your submission. The full list of questions is provided below. The Rules change tables also contain the consultation questions.

The following questions will be asked through our consultation site. We ask that you provide responses via the consultation site as this greatly assists our analysis of submissions and allows us to process submissions more efficiently. The questions below are provided to facilitate preparation of your answers before entering them into the consultation site.

Change in annual reporting timeframes

- Do you agree with the proposal to change the current Rules reporting year, currently January to December (calendar year), to July to June (financial year)?
- Do you agree that if a change to financial year reporting is introduced, revised Rules reporting year should apply from 1 July 2027?
- Are there any implementation issues or impacts associated with changing to a financial year that you would like to provide feedback on?

Level 3 Source water classes

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

Class A and Class A (Interim) source water

- Do you agree with the proposal that Class A source water will not require primary treatment for bacteria, viruses or protozoa (though they will still need to add chlorine to provide a residual)?
- Do you agree with the proposed requirement for an enteric viral monitoring programme to demonstrate a health-outcome target for viral risk can be met?
- Do you agree with the proposed health-outcome target of one enteric viral infection/10,000 people/year?
- Do you agree with the proposed requirement that an independent suitably qualified and experienced person must prepare a written report demonstrating that the health-outcome target can be achieved and maintained for the supply?
- Do you agree with the proposed criteria included in Class A (Interim) to establish Class A source water?
- Do you agree with the 24-month timeframe for establishing Class A source water?

Class B and Class B (Interim) source water

- Do you agree with the proposed criteria for demonstrating Class B source water?
- Do you agree with the proposed criteria included in Class B (Interim) for establishing Class B source water?
- Do you agree with the 24-month timeframe for establishing Class B source water?

Source water contamination assessments

- Do you agree with the proposed assessments for Class A, Class A (Interim), Class B and Class B (Interim) source water if any monitoring result indicates potential contamination or the groundwater source has been compromised?

Class C source water

- Do you agree with the criteria for Class C source water?
- Do you agree that an assessment to reclassify a Class D source water to Class C should only be undertaken by a suitably qualified and experienced person?

Class D source water

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

General rules module

G.RR.4

- Do you agree (for all applicable rules) with the change to make all continuous monitoring rules reported on a monthly basis?
- Do you agree with non-compliance reporting for non-compliance with continuous monitoring rules?
- Are there any cost implications for you from this proposed change?
- If there are costs - will these be internally or from purchasing services?

G.RR.5

- Do you agree with including a rule that sets out the requirements specific to grab sampling for monitoring rules?
- Do you agree with changing some reporting that is currently annual into monthly reporting?

G.CM.3

- Do you agree with the 24-hour grab sample time proposed to account for the missing source water or distribution zone continuous monitoring data with a limit of up to 48 hours?

G.CM.4

- Do you agree with the 60-minute grab sample time proposed to account for missing treatment continuous monitoring data?

Level 3 Source water monitoring rules module

S3.CR.1

- Do you agree that an assessment to classify a source water class should only be undertaken by a suitably qualified and experienced person?
- Would there be any cost implications for your organisation?

S3.AB.1

- Do you agree that an assessment to demonstrate a sanitary bore head should only be undertaken by a suitably qualified and experienced person?
- Would there be any cost implications for your organisation?

S3.AB.2

- Do you agree with only allowing representative sampling for Class A, Class A (Interim), Class B and Class B (Interim) source water?
- Do you agree with the proposal to remove the six bore limit for representative sampling?

S3.AB.4

- Do you agree with the frequency for testing for a viral indicator being determined by the supplier's enteric viral monitoring programme?

S3.AB.5

- Do you agree with the removal of the requirement to monitor for colour for Class A, Class A (Interim), Class B and Class B (Interim) source water?

S3.AB.6

- Do you agree with requiring continuous monitoring for conductivity, pH and turbidity for Class A, Class A (Interim), Class B and Class B (Interim) source waters?
- Would there be any cost implications for your organisation?

S3.AB.7 and S3.CD.4

- Do you agree with the proposed addition of boron, fluoride and hardness?
- Do you agree with the proposed removal of barium, calcium and magnesium?

S3.AB.9

- Do you agree that testing for radiological determinands should only be required for Class A, Class A (Interim), Class B and Class B (Interim) source waters?

S3.CD.6

- Do you agree with the change to an assessment of the likelihood of the presence of cyanobacteria in source water and moving the assessment of cyanobacteria risk to the source water risk management plan?
- Do you agree that the likelihood assessment should only be undertaken by a suitably qualified and experienced person?

S3.CD.7 and S3.CD.8

- Do you agree with the change from requiring suppliers to prepare a cyanobacteria/cyanotoxin response plan to prescribing monitoring?
- Do you agree with the requirements to monitor cyanobacteria biovolume when source waters have a medium or high likelihood of planktonic or benthic cyanobacteria being present?
- Do you agree that suppliers do not need to undertake monitoring of source water for planktonic or benthic cyanobacteria if they have a cyanotoxin removal process as part of their treatment?

S3.CD.9

- Do you agree with the cyanobacteria biovolume threshold prescribed for initiating the commencement of cyanotoxin monitoring in treated water?

S3.5 (existing rule) - Remove

- Do you agree with the proposed removal of additional event-based monitoring of Class C and D source waters from the Rules?

Footnotes 33, 36 and 40 (existing footnotes) - Remove

- Do you agree with the proposed removal of footnotes on the collection of samples from the Rules?

Level 3 Treatment rules module

T3.BV.C2

- Do you agree with removing chlorine dioxide as an option for bacteria and virus treatment?
- Do you agree with removing the requirement for Self-supplied buildings providing water to more than one building to use chlorine?

T3.PZ.C3

- Do you agree with removing the coagulation, flocculation and sedimentation process without filtration process option?
- Do you agree with removing the current coagulation, flocculation and direct filtration process option for achieving 3 log and 3.5 log credits?
- Do you agree with removing the reference to flocculation in the current coagulation, flocculation and direct filtration process?
- Are you using coagulation and direct filtration to achieve 3 log or 3.5 log credits?
- Do you agree with removing the second stage filtration process option?
- Do you agree with removing the slow sand filtration process option?
- Will removing these options create any challenges for your organisation?

T3.PZ.C5

- Do you agree with the proposed changes for managing recycled water at treatment plants?

T3.PZ.C6

- Do you agree with the inclusion of this rule about the turbidity of filtered water?

T3.PZ.X4

- Do you agree with the removal of the option to use AS/NZS 4348:1995 in conjunction with AS/NZS 3497:1998 (updated 2001)?

Chemical monitoring rules

T3.CH.1

- Do you agree with requirements for suppliers to demonstrate that chemicals dosed into drinking water are safe for use?
- Will meeting the requirements of this proposed rule create challenges for your organisation?

T3.CH.2

- Do you agree with this proposed rule requiring preparation of a schedule of chemicals used in treatment?

T3.CH.3

- Do you agree with the increase in monitoring frequency to monthly for chemicals that were previously determined to have standard values?

T3.96 (existing rule) - remove

- Do you agree that the requirement for event-based monitoring should be removed from the Rules and managed by the supplier on a case-by-case basis?

Cyanotoxin monitoring rules

T3.CY.1

- Do you agree with this proposed rule on when cyanotoxin monitoring must be undertaken in treated water?

T3.CY.2

- Do you agree with this proposed change to the sampling frequency of cyanotoxins?

Level 3 Distribution rules module

D3.PM.1

- Do you agree with the proposal to require continuous monitoring of pressure in distribution zones?
- Do you agree with the requirements of the proposed rule?
- Do you currently have pressure monitoring in place in any of your distribution zones?
- Are there any cost implications for you of this proposed change?

D3.PM.2

- Do you agree with the proposed pressure limits in distribution zones?

D3.RD.1

- Do you agree with the proposed rule on monitoring Free Available Chlorine (FAC) in a distribution zone?
- Do you agree with meeting compliance requirements by using either continuous or grab sampling options?
- Do you agree that continuous monitoring of FAC should be required for all distribution zones?

Seeking feedback on other matters

Rule type changes:

- Do you have any comments on the proposed rule type changes or changes to reporting frequency?

Interpretation changes:

- Do you agree with the proposed changes to the definitions in the interpretation rules?

Costs for your organisation:

- Do you agree with our assessment of the cost implications of the proposed Rules changes?

- Do you have any comments on the cost implications of the proposed Rules changes?

Formatting changes:

- Do the proposed changes make it easier to follow the Rules?
- Do you agree with the revised Rules numbering system?
- Do you have any comments on the proposed formatting changes?

General comments:

- Do you have any comments on any other proposed rule changes?
- Do you have any general comments you would like to make about the proposed changes?

Appendix 2: Continuous monitoring non-compliance reporting example

The proposed rule T3.BV.C4(a) relates to continuous monitoring of drinking water leaving a treatment plant and specifies that Free Available Chlorine Equivalent (FACE) must be no less than 0.2 mg/L.

Supply A was non-compliant with this rule for three days and the supplier provides the following rule compliance report.

Rule ID	Supply Component ID	Complies with Rule	Non-Compliant Periods	Notes
T3.BV.C4.a	TP999	FALSE	3	Example continuous monitoring rule report with exceptions

To report on the date, duration and extent of non-compliance the supplier provides the following exception report.

For each non-compliant day, the supplier specifies the start and end time that FACE was less than 0.2mg/L as well as the minimum and maximum value recorded.

Rule ID	Supply Component ID	Start Date	Start Time	End Date	End Time	Minimum Value	Maximum Value	Parameter Determinand
T3.BV.C4.a	TP999	1/01/2027	1200	1/01/2027	1300	0	0	FACE
T3.BV.C4.a	TP999	6/01/2027	0200	6/01/2027	0400	0.1	0.19	FACE
T3.BV.C4.a	TP999	15/01/2027	1600	15/01/2027	1800	0.05	0.19	FACE

Appendix 3: Use of information

The information provided in submissions will be used to inform the Rules. The Authority may contact submitters directly if clarification of any matters in submissions or other feedback is needed.

Publication of submissions

Following consultation and analysis of feedback, the Rules will be revised and reissued. The Authority may publish copies of submissions, and a summary of submissions, on its website. Submissions may also be subject to requests under the Official Information Act 1982.

Please clearly indicate if you have any objection to the publication or release of your submission or any information within it, the parts of your submission you consider should be withheld, and the reasons for withholding. If you notify us of an objection, the Authority will take your views into account and will consult with you to the extent the Authority considers necessary before publishing your submission or responding to any relevant request for official information.

Personal information

The Privacy Act 2020 establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including the Authority. Any personal information you include in your submission will only be used for the purposes set out in this 'Use of information' section, for contacting you about your submission, or to advise you of the outcome of the consultation including any next steps.

The Authority may also use personal information you include in your submission for other reasons permitted under the Privacy Act (e.g. with your consent, for a directly related purpose, or where the law permits or requires it). Please clearly indicate in your submission if you do not wish for your name, or any other personal information, to be included in any published copy of your submission or included in any summary of submissions.

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