

10 May 2024

Via email: [councils@dia.govt.nz](mailto:councils@dia.govt.nz)

## **SUBMISSION TO THE SECRETARY FOR LOCAL GOVERNMENT ON RULES SETTING LOCAL GOVERNMENT PERFORMANCE MEASURES**

Thank you for the opportunity to present this submission on the Rules Setting Local Government Performance Measures.

The Queenstown Lakes District Council (**QLDC**) recognises the need to update references to the 2005 Drinking Water Standards for New Zealand in the Rules Setting Local Government Performance Measures.

QLDC supports an update to the reference but recommends that Performance Measure 1 (safety of drinking water) is updated to measure and report against compliance with the relevant Drinking Water Quality Assurance Rules 2022. This is because the quality assurance rules are a reflective and fuller measure of whether drinking water standards are being met, and the monitoring and reporting is already in place.

QLDC would not like to be heard at any hearings that result from this consultation process.

Thank you again for the opportunity to comment.

Yours sincerely,



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**Property & Infrastructure General Manager**

# SUBMISSION TO THE SECRETARY FOR LOCAL GOVERNMENT ON RULES SETTING LOCAL GOVERNMENT PERFORMANCE MEASURES

## 1.0 QLDC context for local government performance measures in relation to drinking water quality

- 1.1 The Queenstown-Lakes District has an average daily population of 70,205 (visitors and residents) and a peak daily population of 99,220. By 2053, the population is forecast to increase to 150,082 and 217,462 respectively.<sup>1</sup> Over the last five years, the district has grown 4.4% per annum, and over the last ten years it has grown 5.9% per annum.
- 1.2 To meet the water needs of the resident and visitor population, QLDC manages eleven registered community supply water schemes. These water schemes are monitored regularly in accordance with the Water Quality Assurance Rules 2022. Water quality is monitored for pH, turbidity, free available chlorine, UV transmittance, total coliforms and Escherichia coli (**e-coli**), among many other things. This is to ensure that the water treatment process and distribution system meets compliance requirements and the Maximum Acceptable Values in the Water Services (Drinking Water Standards for New Zealand) Regulations 2022 (**the Drinking Water Standards**).
- 1.3 QLDC measures and publicly reports against the Drinking Water Quality Assurance Rules 2022 (**the Quality Assurance Rules**).

## 2.0 Performance should be measured against compliance with the Drinking Water Quality Assurance Rules 2022

- 2.1 QLDC supports updating the performance measure for safety of drinking water in the Non-Financial Performance Measures Rules 2013. However, it is recommended that the appropriate performance measure is compliance with the Quality Assurance Rules. The Quality Assurance Rules reflect current best practice and councils already measure and report performance against them.
- 2.2 Drinking water suppliers ensure they are complying with the Drinking Water Standards by meeting the requirements imposed on them by the Quality Assurance Rules. The Quality Assurance Rules were developed by Taumata Arowai in accordance with section 49 of the Water Services Act 2021. Compliance with the Quality Assurance Rules ensures that water does not exceed the Maximum Acceptable Values for key determinands in table 1 of the Drinking Water Standards, including e-coli and protozoa. However, the Quality Assurance Rules give a better reflection of drinking water quality compliance status. They are a reflective and fuller measure of whether the Drinking Water Standards are being met, and the monitoring and reporting is already in place.
- 2.3 The changes introduced by the Drinking Water Standards and Quality Assurance Rules reflect an underlying change in approach to ensuring drinking water quality. The proposed update of the reference to Maximum Acceptable Values for two determinands (e-coli and pathological protozoa) does not take into account this change in approach and the treatment and processes required under the Quality Assurance Rules. Measurement of performance for drinking water quality should reflect current practice and measure against compliance with the relevant Quality Assurance Rules which are reported on for each water scheme monthly and annually.
- 2.4 Further, it will be difficult to measure against the values outlined in the table in the Standard because there is currently no requirement to sample for total pathogenic protozoa. It is a requirement to have a protozoa barrier, but not to regularly sample for this anywhere within the water scheme.

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<sup>1</sup> <https://www.qldc.govt.nz/community/population-and-demand>

**Recommendation:**

QLDC recommends that Performance Measure 1 (safety of drinking water) should be updated to measure and report against compliance with the relevant Drinking Water Quality Assurance Rules 2022.