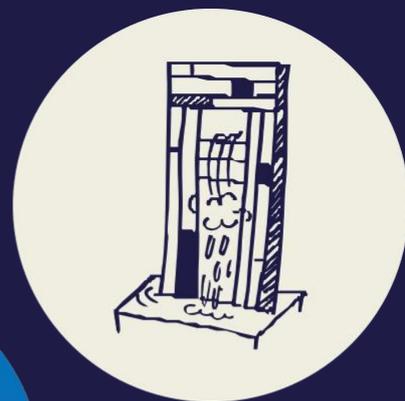


HAMILTON CITY COUNCIL STAFF SUBMISSION

Taumata Arowai Drinking Water Consultation Documents:

- Drinking Water Standards
- Drinking Water Quality Assurance Rules
- Drinking Water Aesthetic Values
- Drinking Water Network Environmental Performance



28 March 2022



Hamilton
City Council
Te kaunihera o Kirikiriroa

Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- A city that's easy to live in
- A city where our people thrive
- A central city where our people love to be
- A fun city with lots to do
- A green city

The topic of this submission is aligned to the priority 'A green city'.

Water is essential to improving the wellbeing of Hamiltonians. Water brings life to our people for food, for housing, for jobs, for recreation. It is essential for our wellbeing.

Council Approval and Reference

This submission by Hamilton City Council staff was approved by Hamilton City Council's Chief Executive on 28 March 2022.

Hamilton City Council Reference D-4128462 - Submission # 683

Key Messages

1. Hamilton City Council staff thank Taumata Arowai for the opportunity to make a submission to proposed drinking water standards, quality assurance rules, aesthetic values and performance monitoring.
2. This submission by staff provides feedback on the following proposed technical documents being consulted on by Taumata Arowai:
 - Drinking Water Standards.
 - Drinking Water Quality Assurance Rules.
 - Drinking Water Aesthetic Values.
 - Drinking Water Network Environmental Performance.
3. Hamilton City Council staff are very supportive of the development of Drinking Water Standards and Aesthetic Values, Water Quality Assurance Rules, Acceptable Solutions and Performance Measures to guide the way drinking water is supplied safely to New Zealanders.
4. Hamilton City Council staff consider that these documents move suppliers and operators in the direction of more regulatory clarity and transparency and will assist in meeting the objectives of Three Waters Reform.
5. **Hamilton City Council staff have assessed where further clarity, methodologies and guidance is required and strongly recommends that full attention is given to delivering this to meet expectations, deliverables, and identify and resolve further issues.** This will maximise implementation success. Recommended amendments will also assist having appropriate regulations in place.
6. The importance of definitions cannot be underestimated. **Taumata Arowai must ensure that definitions are consistent in all drinking water related regulations and along with the Water Services Act.** This includes Point of Supply, types and sizes of drinking water supplies.
7. There is concern for implementation costs and resourcing. This includes activities such as sampling, testing and data collection and reporting. **Cost transparency is recommended in order to understand the resourcing required for compliance.**
8. Hamilton City Council takes obligations for workplace safety seriously. **Staff seek that any direction to carry out sampling in extreme events be removed from regulations.**
9. Hamilton City Council staff are pleased to see that some suppliers will be brought under the umbrella of regulations, and that there is provision for adjustment of assurance rules and ability to provide feedback on implementation of rules.
10. Provision of environmental performance measures for three waters are a positive step forward for the water sector and should achieve greater transparency about the performance of networks and impacts on the environment and public health. However, there is some confusion about the scope that is not directly related to 'performance'. **It is recommended that the scope of environmental performance measures is reviewed to ensure that the intent of the Water Services Act 2021 is met.**
11. Staff support the intent of Taumata Arowai to look at alignment with other reporting. **Staff consider that alignment of performance measure reporting with other reporting requirements is critical for efficiency and recommend that this is prioritised.**

12. Water suppliers are in a period of unprecedented change; managing the recovery from COVID, responding to the requirements of significant regulatory change, and increasing customer expectations, all in an environment where there are significant resourcing constraints. **There are significant concerns about the ability to comply with the proposed timelines for reporting and a delay is recommended.**
13. With the establishment of the National Transition Unit, water suppliers will soon be asked to support and participate in the transition of water supply activities from councils to the proposed Water Service Entities and manage the impact of change that will directly affect every member of their teams. To recognise significant change in the industry due to Water Reform, the current pandemic environment and to realise many other benefits, staff recommend a delay. **Timelines for reporting should be adjusted to align with the transition of water suppliers to the new water services entities which are to be completed in July 2024.**
14. **Mandatory participation in Water New Zealand National Performance Review (“NPR”) would identify reporting issues, new data collection systems, and provide readiness prior to establishment of new water entities.** Due diligence on the value of each data point and level of confidence is also necessary. Obtaining confidence in Water New Zealand NPR measures should be prioritised over expanded reporting.
15. Alignment with Te Mana o te Wai is embraced. **The objectives of Te Mana o te Wai will be enhanced with regional iwi and hapu level cultural health frameworks and co-design performance measures and indicators.** This will also assist with gauging positive partnerships.
16. **Consultation and collaboration with the community, and strategic partners is important, and measures should be developed to report on engagement and support of the four wellbeing's.**
17. Hamilton City Council staff would be pleased to have further engagement on the next round of consultation, which staff understand will be targeted consultation.

Introduction and General Comments

18. Hamilton City Council provides water, wastewater and stormwater services to New Zealand’s fourth largest city, with a population of over 176,500 (Stats NZ). Hamilton’s drinking water treatment plant and distribution system has maintained a very high level of compliance under the Health (Drinking Water Amendment) Act 2007 and the Drinking Water Standards for New Zealand 2005 (Revised 2018). A bore supply is also provided to service a small number of visitors to a rural park (Taitua Arboretum). The wastewater and stormwater network system ultimately discharges to the Waikato River, the ancestor of Waikato Tainui.
19. In general, staff support the development and use of regulatory tools in the form of Drinking Water Standards and Aesthetic Values, Water Quality Assurance Rules, Acceptable Solutions and Performance Measures to guide the way drinking water is supplied safely to New Zealanders.
20. Staff agree that the proposed regulatory documents will provide more clarity around minimum standards associated with the provision of safe drinking water.
21. Separating the Drinking Water Standards and Aesthetic values and inclusion of assurance and monitoring requirements is supported. This helps to highlight the importance of operational monitoring and risk management and supports the Six Principals of Drinking Water Safety.
22. Staff support the intent of monitoring the environmental performance of three waters networks.
23. Hamilton City Council’s three waters activities need to be aligned with the Waikato River Settlement Act 2010 and Te Ture Whaimana o te Awa o Waikato (The Vision & Strategy). These seek to both protect and restore the river and the relationship of iwi with the river. Performance measures will play a key part in demonstrating progress towards restoration and protection of the Waikato River.
24. Staff have significant concerns about how performance data will be provided at a time where the industry is undergoing significant change and has recommended that reporting timeframes are delayed.

25. Staff also note that the Ministry is still in the process of determining reporting efficiencies and consider this of fundamental importance to realising the benefits that three waters reform seeks.
26. It is also essential, during a period of significant change within the water sector, that careful consideration is given to aligning some proposed reporting changes to the programme of transition activities of water suppliers into the new water entities.
27. Staff note that the estimated costs of compliance to meet new proposed standards, rules and performance monitoring have not been provided. This may be an issue for many councils that are currently under-resourced.
28. Hamilton City Council takes a considerable interest in matters regarding Three Waters and has made numerous submissions in this space in recent years – refer **Appendix 1**. All submissions made by Hamilton City Council can be accessed **here**.
29. Hamilton City Staff note that after feedback has been provided to Taumata Arowai, that they will be carrying out targeted consultation. We invite Taumata Arowai to include Hamilton City Council in that targeted consultation.

Proposed Drinking Water Standards

30. The following feedback is given in response to questions asked by Taumata Arowai.

Review Process

31. Hamilton City Council staff agree with the process to review the maximum acceptable values (“MAVs”) for drinking water standards. Staff support the alignment of MAVs with guideline values set by the World Health Organisation and review and refinements by New Zealand experts and technical reference groups.

Proposed Maximum Acceptable Values (MAV)

32. Staff agree that proposed MAVs will support the objective of ensuring that drinking water suppliers provide safe drinking water to consumers. MAVs provide clear guidance to water suppliers on the quality requirements for the provision of safe drinking water to consumers.
33. Staff are encouraged to see consideration of short-term exposure MAV’s (e.g., 1080) in the proposed drinking water standards. Currently, chemical MAVs are based on risk over a lifetime (70 years) of exposure. In some cases, exposure to contaminants can be short in duration and not continued over a lifetime. This means that long term MAV standards are being used to manage short duration exposure events which may result in an overly conservative management approach.
34. Where appropriate, staff support the continued investigation and development of short-term MAVs, in addition to existing long-term MAVs, to ensure both chronic and acute potential health impacts are managed effectively.

Additional Feedback on Drinking Water Standards

35. The Drinking Water Standards and summary document says that all consumers on a supply should receive water that meet the standards from treatment to the tap, and at all points in a water system after treatment, however ‘water system’ is not defined in the Standards. Section 13 of the Water Services Act 2021 defines ‘point of supply’. Staff recommend a clear definition that aligns with the Water Services Act.

Drinking Water Quality Assurance Rules

36. The following feedback is given in response to questions asked by Taumata Arowai.

Providing Safe Drinking Water to Consumers

- 37. Hamilton City Council staff agree that the proposed Drinking Water quality assurance rules (“rules”), in conjunction with Water Safety and Source Water Risk Management Planning, Drinking Water Standards and Aesthetic values, support the objective of ensuring that drinking water suppliers provide safe drinking water to consumers.
- 38. Staff support those rules that apply to a broader range of drinking water supplies and supports the adjustment of rules (as required) to respond to operational experience, developments and understanding in water services activities. Staff strongly support the intent to have a mechanism to provide feedback on implementation of rules.

Water Supply Categories

- 39. Hamilton City Council staff consider the water supply categories based on populations (including transient populations and on-demand networked supplies) and type of supply (i.e., trickle feed, water carriers etc.) provides a pragmatic, tiered approach to ensuring safe drinking water based on supply scale and risk. However, categories could be further simplified by replacing ‘complexity’ with the intended population base.
- 40. Of concern is the level of interpretation required for determining application of rules to the categories. Staff interpret Section 2 (Application of Rule Modules) as meaning that each registered supply still has its own supply category and associated compliance rules. However, it can also be interpreted that, regardless of category or type, a supply registered to a large supplier needs to meet the Level 3 rules because the population as a whole is >500 people. Staff seek further documented clarification, potentially supported by examples and diagrams.
- 41. There is no direction in the consultation document on when an acceptable solution would need to be applied, especially for small water supplies. It is recommended that further clarification is provided by Taumata Arowai around the application of the rules vs Acceptable Solutions, particularly where there is overlap. The proposed rules appear subjective and is unclear as to what would trigger the use of an “acceptable solution” and, for example, where the Building Act applies.
- 42. Further to this, there is also no direction on the interface between these rules and the Building Act regulatory measures. It would be helpful if this was articulated in the rules.
- 43. Compliance assessments based on compliance periods is supported. This will better inform consumers on the performance of their drinking water supply.

Planned Event Temporary Drinking Water Supply

- 44. Staff consider it appropriate that rules associated with a Planned Event Temporary Drinking Water Supply are included in the quality Assurance Rules to ensure greater awareness of requirements.

Drinking Water Quality Assurance Rules ‘Structure’

- 45. Rule modules provide better clarity on compliance requirements and the rules are easier to read and follow, therefore the structure is supported. However, it is recommended that complexity is linked to population base.

Allocation of Modules

- 46. Staff generally support all allocations of modules to the different categories, however, seek further clarification on the definition of Very Small or Small drinking supplies, Self-Supplied Buildings, and Community Drinking Water Stations.

47. Allocations to Very Small and Small supplies is generally supported but staff recommend further guidance on how these rules work with the acceptable solutions (e.g., a bore supply serving <50 people could apply the Very Small Drinking water supply rules or the Acceptable solution for Spring and Bore Supplies). While staff in general support module application to self-supplied buildings, there is some concern that if rules are too stringent, this will disincentivise water sensitive design and impact on water sustainability. There may also be an increase in requests for asset vestment. Staff recommend further clarification around what constitutes a “Self-supplied Building Drinking Water Supply.”
48. Staff are also concerned that this allocation could apply to industrial and commercial precincts, hospitals and retirement villages which would place additional pressure on large water suppliers to provide information and guidance or increase vestment of assets.
49. Strong support is given to the allocation of modules to Water Carrier Services. This is a very positive outcome for water carrier services as it protects their customers and provides for protection of the registered water supply they are drawing from.
50. General support is also given to the allocation of modules - Community Drinking Water Stations and Water Carrier Supplies. Staff recommend that a description should be provided for “network supply” to provide further clarity around what constitutes a “Community drinking water station.” This could be achieved through the broadening of the definition for this module.
51. Hamilton City Council, for example, provides two sites that are used by members of the community who prefer non-fluoridated water to fill containers. However, neither of these supplies would meet the current definition of Community Drinking Water Station as one is connected to the Hamilton City network supply (with an on-site Reverse Osmosis and chlorine dosing plant), whereas Taitua Arboretum UV treated bore also supplies a single dwelling and site buildings through a small distribution system.

Trickle Feed Water Supplies Rule F1

52. Staff agree that Trickle Feed Water Supplies must comply with Rule F1 in addition to modules G + S2 + T2 + D2. This ensures public supply would be protected from backflow.
53. In some instances, the Building Act 2004 will require a building consent for tanks and that this will add a level of complication for water suppliers to oversee rule compliance.
54. In addition to this, where there is a secondary network supplier, there will be a requirement for additional monitoring equipment at the interface of the secondary supply point to monitor quality.

Additional Feedback

55. Under the definition of Trickle Feed Water Supplies, the point of supply appears to imply the tank inlet rather than the toby. This is in conflict with the Water Services Act 2021 which defines the point of supply being toby. This may present issues with private property access and responsibilities under Council Bylaws. Staff seek clarification on these definitions and their application.
56. Staff recommend that further guidance be provided by Taumata Arowai around whether it is the intention for Network operators to take ownership of the supply from tank to toby. If this is the intention, then Hamilton City Council staff encourage Taumata Arowai to reconsider as this would have significant implications on matters such as requiring additional easements, private access and costs associated with asset ownership.
57. It is also recommended that the current definition of “Self-supplied Building Drinking Water Supplies” be expanded to include the definition characteristics of “Water Supply” as per Section 9 (1)(a) and (b) of the Water Services Act 2021 i.e., “A Self-supplied Building Drinking Water Supply” is a building that has infrastructure and processes to abstract, store, treat, transmit drinking water for supply to consumers” or something similar.

Compliance Rule Modules

58. Hamilton City Council staff generally support the proposed Compliance Rule modules, however, provide specific comments for the following:
59. **General Rules:** Some of the Assurance rules could be considered subjective and guidance is sought on what expectations and deliverables will be required to demonstrate compliance with these rules.
60. Reporting timeframes in Rule G1 seem appropriate though requiring within 10 days of month end could place additional pressure on resourcing.
61. Staff have concerns relating to the sample transportation rules specified in G4. While the intent of the rule is appreciated, staff acknowledge that delays in transportation, particularly in remote rural areas, is of concern, particularly the requirement for samples to reach the laboratory within 24 hours. This appears arbitrary as it does not seem to consider the time it takes before the laboratory begins analysis. Staff recommend that the rule should refer to the maximum time following sampling that analysis should be undertaken.
62. Hamilton City Council staff seek clarification regarding the requirement for samples to be transported at or below 6°C, noting that this could include freezing temperatures which is not appropriate for some analyses. Hamilton City Council's current sampling practice is to ensure the temperature of a sample is lower on arrival at the laboratory than the temperature when the sample was taken.
63. Further clarity is also sought on whether it is the transport environment (e.g., a chilly bin chamber) that needs to be below 6°C, or the temperature of the sample itself. Demonstrating that transportation temperature remains below 6°C for the purposes of compliance monitoring will be challenging, especially given the significant number of individual samples involved and uncertainty around whether sample temperatures are required for each individual sample. This rule may require investment in additional data logging and reporting systems.
64. The allowance of missing data referred to in Rule G9 and G10 is supported. However, it is unclear on what notification or reporting requirements would be required should there be a gap in data of over a minute but less than 15 minutes.
65. Hamilton City Council staff therefore recommend that Rules G9 and G10 be combined and reworded to eliminate any contradictions that could be perceived in the interpretation of these rules i.e., for all continuous monitoring equipment, the separation between data records must be no more than 1 minute. Where generation of continuous monitoring data is interrupted, gaps must be no more than 15 consecutive minutes or for a total time of 72 minutes in one compliance period, for compliance to be achieved.
66. Taumata Arowai could consider whether G9 and G10 might be better allocated as monitoring rules, reported along with treatment monitoring data, rather than Assurance rules.
67. **Source Water Rules:** Hamilton City Council staff generally support the proposed Source Water rule modules including providing requirements on monitoring specific parameters and the simplification of protozoa categorisation, however, provide specific comments for the following:
68. Hamilton City Council staff have concerns about the heavy reliance on visual inspections and consumer complaints to manage significant risk associated with cyanotoxins (Rules S1.3 and S1.4) and query if even Very Small Supplies should undertake a cyanobacteria risk assessment.
69. Staff support the necessity to visually inspect the water but consider that additional expertise may be required to identify blooms, especially in larger surface water sources where cyanobacteria may be distributed throughout the water column rather than in benthic mats. Accessibility issues may also make visual inspections to 50m difficult.
70. Climate change brings many unknown risk factors that could directly impact the quality of any water source with possible future contaminants currently unknown to water suppliers. Staff recommend that Taumata Arowai consider developing a database which collects data around water quality trends.

71. The introduction of Class 1-4 for source water protozoa log credit determination, including the default to 4 log credits for surface water is supported. This approach simplifies the process of source water protozoa log credit categorization for large suppliers. However, staff query if the requirements for Interim Class 1 when *E.coli* is detected, manages risk appropriately. Clarity should be provided as to whether a supply is able to stay as Interim Class 1 indefinitely without installing a protozoa barrier if *E.coli* is repeatedly detected and the 3-year monitoring period restarts.
72. Hamilton City Council staff generally support and understand the intent of monitoring the source water during and immediately after a severe and/or extreme weather event (Rule S3.4). However, there is concern that this specific type of additional monitoring requirement could expose operators to an unsafe working environment, particularly if the water source is large in scale such as rivers that have the potential to rapidly rise and flood during a severe or extreme weather event. It is recommended that Taumata Arowai reconsider this additional monitoring requirement and remove the monitoring requirements during the event itself. Staff consider that monitoring risks associated with varying environmental conditions, including extreme weather events, might best be managed by the supplier through monitoring and response planning processes and assigned as an Assurance Rule rather than a Monitoring Rule.
73. Guidance on cyanobacteria response triggers may be beneficial as scientific advice received by Hamilton City Council on the use of biovolume and cell count triggers differed from triggers in the Ministry of Health Guidelines.
74. Hamilton City Council staff note the requirement to undertake radiological monitoring of surface water sources. While the requirement is only 5 yearly, the cost of testing is high. If radiological contaminants are considered a risk in surface water, then the ability to stagger testing where water is drawn from the same source by different suppliers would be beneficial.
75. Hamilton City Council staff are supportive of continuous monitoring of the source water parameters listed in the S3 rules, table 15 but seeks clarification on the expectations relating to this data as a compliance monitoring rule.
76. **Treatment Rules:** Hamilton City Council staff generally support the proposed treatment rules modules, however, provide specific comments for the following:
77. Hamilton City Council staff recommend that Taumata Arowai provide a definition as to what “intermittently elevated turbidity” is in Treatment Rule T1.1. Source Waters Rule S1 is silent to any level of turbidity in S1 rules though turbidity monitoring may be expected to be addressed in the Source Water Risk Management Plan.
78. Staff support the change to the use of Typical Value Approach for chemical monitoring. We believe this a more simplified and improved approach than using Priority determinands.
79. Hamilton City Council staff seek clarification from Taumata Arowai as to why both continuous monitoring and weekly grab samples are required when fluoride is added to the water at the treatment plant. Grab samples should either be the primary compliance monitoring method or alternatively if continuous monitoring is undertaken and used to demonstrate compliance, grab samples should only be a process control measure to assist the water supplier in verifying the accuracy of online instrumentation.
80. Staff are supportive of the need for comprehensive risk-based cyanobacteria management in source water, however we are concerned with the statement relating to cyanotoxin monitoring in section 10.9.4 and rule T3.93. In both cases, it refers to a requirement to monitor the treated water for cyanotoxins whenever cyanobacteria are found to be present in a water source. The intention of this requirement is to manage the risk of cyanotoxins being present in treated water. While we support a risk-based approach, we believe that this is an overly conservative response to the presence of cyanobacteria in a source water.

81. The Waikato River at Hamilton generally always has a level of cyanobacteria present. Hamilton City Council have developed triggers with assistance from cyanobacteria experts at NIWA, to initiate cyanotoxin monitoring based on cyanobacterial cell numbers and biovolumes to identify when there is an elevated risk associated with a particular cyanobacteria being present in the source water. We would suggest that water suppliers are given the flexibility to have a risk-based approach as part of source water risk management planning, as to when cyanotoxin testing of treated water is triggered. Staff also note that currently there are limited laboratories accredited for cyanotoxin analysis and testing can be costly, so where possible unnecessary analysis should be avoided.
82. Hamilton City Council staff generally support the proposed Distribution System rule modules, however, provide specific comments for the following:
83. The Drinking Water Quality Assurance Rules summary document states that 'Residual disinfection is compulsory unless an exemption is approved by Taumata Arowai, or a relevant acceptable solution is implemented that enables a drinking water supply to operate without residual disinfection'. Staff note that for Treatment Rule T1 and Distribution Rule D1, there are no chlorine requirements specified.
84. The sampling frequency proposed for *E.coli* and total coliforms in table 8 Distribution System Monitoring Determinands, associated with Distribution Rule D1.1, does not seem to impose a duty of care or reflect the risk and ability to respond in a timely manner if there is an issue with the supply. We note that sampling is a lag indicator of any issue, however we would suggest that further risk mitigation should be considered to assist with identifying any increased risk of a potential issue with a water supply.
85. We note that in table 13 – D2 Distribution System Monitoring Determinands/Parameters includes limits for each determinand. Hamilton City Council staff seek clarification as to whether inclusion of limits in this table is necessary when there are the Drinking Water Standards and Aesthetic Values limits that should be referenced. To remain consistent with the rest of the Drinking Waters Quality Assurance Rules document, we suggest that an additional rule is added to require FAC results to be >0.2mg/L.
86. D3 Rules – Hamilton City Council staff are supportive of the rules, but note the assurance rules are quite subjective, with the potential for variation in the quality of the required plans and implementation timeframes. For rules with significant impacts, staged transition may be beneficial to ensure that regional alignment might be considered by water suppliers rather than individual suppliers investing in programmes that may require overhaul when the new entities come in.
87. The importance of backflow management in the protection of treated drinking water is acknowledged and staff support the general intent of the proposed rule as part of Distribution System Rules D3. However, some of the new provisions may take time and funding to implement. It is suggested that a phased transition period would be appropriate to enable water suppliers to meet all requirements.
88. Hamilton City Council staff note that guidance on the impacts of internal point of use and zone devices and air gaps within the building on the risk profile at the point of supply would be useful to water suppliers to help ensure consistency and manage customer expectations.
89. The inclusion of Rule D3.6 is supported as Hamilton City Council have prohibited the use of fire hydrants for purposes other than firefighting and network maintenance activities since 2013 and note that consistency at a national level will help further improve compliance.

90. Hamilton City Council staff seek clarification on 'operation of the drinking water supply' as fire hydrant flow testing is required under Building regulations but is not strictly a water supplier activity as such. Note that Hamilton City Council have also processed several special permits for extraordinary requests to use hydrants where tankered water is not practical e.g., fuel tank installations where hydrostatic pressure needs to be carefully managed, so tanks do not implode during backfilling and pressure testing a large new wastewater main before commissioning. Consideration should be given as to whether such exemptions should still be permitted or not.
91. Hamilton City Council staff also seek guidance around the need to understand the impacts of illegal water takes on compliance with D3.6, noting that infringements are not a tool available under many Bylaws and prosecution may be required to take action against offenders.
92. Hamilton City Council staff are supportive of Section 10.10.2 - Facilities operation, maintenance and Disinfection Rules but note that preparation of the water storage plan and associated operational impacts will require some time to implement so it may be challenging to have these in place at the beginning of the period the rules come into effect.

Drinking Water Aesthetic Values

93. Hamilton City Council staff acknowledge its duty of care and the importance of providing aesthetically acceptable water to customers as part of a broad risk management approach under section 24 of the Water Services Act 2021.
94. However, there is a lot of subjectiveness in determining whether the aesthetic properties of drinking water are or are not considered acceptable to most consumers. While the provision of Aesthetic guideline values to assist water suppliers in providing aesthetically acceptable water is supported, staff remain concerned that the public may perceive their water as unsafe if they know aesthetic values are not in range. See comments below on revisions to aesthetic acceptable ranges for temperature, chlorine, taste, and odour.
95. Clarity is also sought on whether Aesthetic Values will be subject to annual reporting specified within the Water Services Act 2021 and if so, will there be guidelines released on expectations of monitoring frequency and actions should these targets not be achieved
96. Staff provide the following feedback on the questions asked by Taumata Arowai.

Proposed Range for Determinands – Taste and Odour

97. Further guidance on expectations of treated water for taste and odour and what this will look like in practice for most customers is needed. Staff recommend Taumata Arowai provide this guidance.

Proposed Range for Determinands – Chlorine

98. The current guideline for chlorine does not specify if this level is referring to FAC (free available chlorine) or TAC (total available chlorine). Staff recommend Taumata Arowai clarify this.
99. The substantial reduction in the acceptable ranges for chlorine levels within the aesthetic value guidelines, may have significant financial implications for a water supplier, like Hamilton City Council.
100. Hamilton City Council have a current target FAC residual at the extremities of the water network above 0.20mg/L. To achieve this, the FAC leaving Council's water treatment plant is 0.80 - 1.0 mg/L. For Council to comply with Distribution rule D3.20, a FAC of at least 0.2 mg/l must be maintained at all locations, at all times. Implications of the proposed aesthetic value range for chlorine being 0.3-0.6mg/L are that chlorine dosing and monitoring infrastructure would need to be retrofitted throughout Hamilton's network to achieve both compliance and aesthetic quality objectives.

- 101.** This results in additional maintenance and operations resourcing, water quality monitoring, security measures and health and safety precautions (Hazardous substances compliance), all of which would take time to plan and identify funding to undertake. Staff request there is consideration of providing flexibility for water suppliers within the aesthetic acceptable ranges for Chlorine, or the enforcement approach taken by Taumata Arowai, to accommodate FAC outside the proposed reduced aesthetic acceptable range for chlorine.

Proposed Range for Determinands – Temperature

- 102.** This is a difficult characteristic to manage as temperature is significantly impacted by environmental conditions often outside the control of the water supplier. Staff acknowledge that the limit does say ‘preferably not above 15°C’, however that is subjective and could leave water suppliers exposed if unable to meet that level.
- 103.** The future impact of climate change is likely to result in observed increases in water temperature. Staff do not believe that it is appropriate to have a fixed guideline for temperature that many water supplies in Aotearoa would struggle to comply with.
- 104.** Staff suggest a revised approach that establishes a guideline limit relative to either the measured temperature of the source water or the water leaving the treatment plant (e.g., +/- X°C of the temperature of the source water or water leaving the plant). This approach will still identify any risks to aesthetic quality that could result of long detention times or low reservoir turn over in warmer weather that water suppliers are able to influence through operational changes.

Drinking Water Network Environmental Performance

General Comments

- 105.** In general, staff are supportive of the proposed environmental performance reporting. The provision of environmental performance measures are a positive step forward for the water sector and should achieve greater transparency about the performance of networks and impacts on the environment and public health.
- 106.** However, staff have significant concerns about the ability to comply with the proposed timelines for reporting. Water suppliers are in a period of unprecedented change, managing the recovery and ongoing impacts from COVID, responding to the requirements of significant regulatory change, and increasing customer expectations. This is all in an environment where there are significant resourcing constraints. With the establishment of the National Transition Unit, water suppliers will also soon be asked to support and participate in the transition of water supply activities from councils to the proposed Water Service Entities and manage the impact of change that will directly affect every member of their teams.
- 107.** Given this expected workload and significant level of change for water suppliers over the next 2 years, an assessment on the capability of water suppliers to meet the proposed expanded environmental reporting requirements in the short term, must be considered.
- 108.** Of note, staff carried out a high-level assessment of 42 proposed performance measures required for phase 1 (data collection from July 2022). Of those measures, 14 data points are not currently collected. Some performance measures would necessitate a ‘system change’ which could have further implications on other processes and resources. There is a measure that is not currently prioritised for data collection due to resourcing issues. And there are at least 4 performance measures that do not have the clarity needed to understand what is being sought. This clearly demonstrates that time frames are not appropriate and need to be extended.

109. There also needs to be high confidence in the quality of the data to allow performance trends analysis over time. It is recommended a higher priority for Taumata Arowai is to examine the quality of 'currently available National Performance Review data' and determine how this can be improved (rather than expanding the scope of measures in Phase 1). See paragraph 115 for further discussion.
110. If national trending and benchmarking is to be reported on, data must be backed by agreed methodology and clear terminology. This will take time to develop and is needed before investment in systems to monitor and manage data are undertaken. Staff recommend that this is prioritised over expanded data collation in the short term. See paragraph 112, 113, 114, 121 and 122 for further discussion.
111. Historically, performance measure reporting has been done at an organisational level. It is not clear to staff what the future intention is for data reporting i.e., will the data be analysed and reported on an organisational, supply, catchment, regional, or entity level? Clarity on this will assist in determining data collection and reporting methodologies and determine value in extending the reporting of these measures prior to the establishment of new entities in July 2024.

National Transition Unit and Data Implications

112. The National Transition Unit, in conjunction with local establishment entities, are also likely to be establishing new efficient data capture and reporting systems that will operate under the new entities. If the expectation to expand on the current level of reporting (including increased data confidence) undertaken as part of the Water New Zealand National Performance Review (NPR) is progressed, this could result in councils needing to invest resources and funding to develop new data capture and reporting processes, which may then become redundant once transition to the new entities occurs.
113. Staff recommend that phase 2 and 3 expanded reporting requirements (e.g., data collection and reporting over and above what is currently collected as part of the Water NZ NPR) are delayed until after the transition of water suppliers to the new water services entities has been completed in July 2024.
114. Benefits to this delay are: (1) Time and resources are not spent creating new data capture and reporting systems that could then become redundant with transition to new entities in less than 2 years (2) Focus of water suppliers can be on BAU (recovery from COVID) and on meeting new increased compliance requirements as well as supporting their people through unprecedented change, (3) Workload on water suppliers can be managed, (4) Alignment with expected Economic regulator reporting requirements, and (5) ensure any phasing aligns to other reporting imposed on water suppliers by other organisations.

Water New Zealand National Performance Review

115. As an initial step towards greater transparency with environmental reporting, Hamilton City Council staff would support participation in the Water NZ NPR becoming mandatory. This initial step would have the following benefits: (1) identify gaps in system capabilities to monitor and report on performance measures, (2) allow for methodologies to be tested and issues remedied, (3) ensure all water suppliers had baseline reporting in place (and then expanded reporting could be initiated by the new Waters Service Entities when new systems and processes, purpose built to meet reporting requirements are fully operational), and (4) allow further alignment with reporting that will be needed as a result of the establishment of an economic regulator.
116. The following feedback is given in response to questions asked by Taumata Arowai.

Scope of Environmental Performance

- 117.** Hamilton City Council staff are neutral on the scope but comment that the scope is very wide and appears to go beyond what was intended as a response to the Havelock North event, freshwater reform and section 3 of the Water Services Act 'Purpose of the Act'. It is noted that there has been a shift of focus from public health and safety and protection of source water e.g., carbon emissions. There is also some risk that the definition of environment may change with RMA (Resource Management Act) reform.
- 118.** Subject to understanding what the 'Network Performance Report' will report on, staff support inclusion of the entire network (from source to discharge) in principle but has some concerns about any reporting on source water as this falls under the regulatory responsibility of Regional Councils and consider that this possibly falls outside the scope of what a 'network' performance evaluation should cover. Staff note that the consultation document Insight 1 includes public health, but there does not appear to be a specific performance measure for this. Clarity is needed to understand how other reporting relates to these performance measures and if drinking water safety should be included in this scope, or if it is covered by the Drinking Water Standards reporting.
- 119.** Staff seek further clarity on how the measures will be reported. Potential end users are the regulator, the water supplier, the Council, the water entity, other organisations and the customer. Staff consider it will be important to understand how measures will be reported that will be meaningful for each end user, and how source water quality is considered.
- 120.** Staff strongly support the preparation and publishing of an overview of commentary in relationship to existing environmental and infrastructure reporting in New Zealand. This will also assist in determining whether future Water Service entities will need to have a relationship with Councils for reporting, especially where there is an overlap e.g., carbon emission reporting. Reporting must be integrated into a holistic 'overview of the three waters services' and must be transparent and consistent.
- 121.** Despite consultation document references to alignment of reporting, staff remain concerned that reporting may become inefficient and resource intensive. Staff recommend the following due diligence: (1) the degree of alignment and if the data is necessary to demonstrate performance of a network, (2) whether data collected is used for decision making, and (3) the level of confidence in methods used to collect data and whether this is being consistently applied across Aotearoa.
- 122.** It is important to only require information that will provide value and does not increase administrative inefficiencies. Staff recommend that a review is carried out after 2 years to identify and resolve inefficiencies, review data needed, review methods used, and determine costs and resources. Staff recommend Councils and water entities are provided with an opportunity to engage in that process.
- 123.** A good outcome of such a review may be the quick progression to a 'unified web-based reporting system' across all relevant oversight domains e.g., economic regulator, Department of Internal Affairs, Ministry for the Environment, National Emergency Management Agency, Statistics NZ. The benefits being reporting alignment, quality of insights, consistency, reduced reporting costs and resourcing.

Giving Effect to Te Mana o te Wai

- 124.** Staff consider, that in general, many measures are aligned to Te Mana o te Wai for the three-level hierarchy. This includes measures that consider water abstraction within environmental limits, consent compliance, network water loss, treatment byproducts, fish passage and systems interruptions.

125. Of interest to Te Mana o Te Wai (or more specifically to Waikato Te Mana o te Awa) and to other elements of network performance, is that information being sought is static. There does not appear to be any intent for suppliers to provide information on data trends.
126. In order to meet the objectives of a separate regulator, improvement (or deteriorating trends) in performance needs to be monitored. Staff understand that in the future Taumata Arowai will develop targets with drinking water suppliers to drive performance. It is expected that target setting will not conflict with specific iwi aspirations and that there is also alignment with regional plan policy and regulation expectations such as that for Waikato's 'Healthy Rivers Plan Change one' targets.
127. Staff note that the concepts and principles of Mana Whakahaere, Kawanatanga and Katiakitanga in the National Policy Statement for Freshwater Management, and in the consultation document, have not been reflected in the performance measures. The following measures could be considered for further discussion with iwi advisors: (1) A measure of co-governance decision-making, (2) development of cultural health frameworks for each rohe.
128. The Waikato River Settlement Act's Te Ture Whaimana o te Awa o Waikato (Vision & Strategy) is the region's direction setting document for restoration and protection of the awa, and Waikato Tainui's ancestral relationship with the awa. Iwi Management Plans Te Tai Pari Tai Umu Tai Ao, and Te Rautaki go some way to interpreting the vision and strategy and therefore potential performance measures.
129. A first step for considering the impacts of network performance may be classifying receiving environments as waiora, wai maaori, wai kino, and wai mate, (and thereafter determining if those states (or mauri) change. It is important to consider who would carry out this classification, and who would report this, noting that staff have made comment about the scope of performance reporting from source to discharge and the overarching regulatory responsibility of regional authorities for source water and iwi partnerships.
130. Staff are cognisant that maatauranga maaori (and therefore potential environmental performance measures) is regionally specific to the iwi and haapu of the rohe. As Councils (and future water entities) traverse what this means for monitoring and reporting, it will be important to ensure that a 'one size fits all' approach does not dilute the aspirations of iwi.

Proposed Outcomes and Principles

131. Staff embrace the intent to frame water management in the context of Te Mana o te Wai but are sometimes confused by how some Te Ao Maaori principles and values are interpreted in Section 3 of the consultation document e.g., Mana whakahaere.
132. The outcomes and principles, as outlined, are generally supported, however, staff seek clarity on who 'we' refers to. Understanding this will assist in successful implementation.
133. Staff also consider that the outcomes and principle are not well linked to the broad insights listed in section 5. For example, the principle 'We will consider how our approach aligns with, and can contribute to, the growth of capability in the water services sector and everyone's understanding of water services' could include both capability and resilience.

Insights and Measures

134. Staff generally support the insights and high-level measures with the following caveats: (1) Broad insight 1 for environment and public health could be separated out as they are both interrelated and distinct elements. (2) The consideration of resilient goes beyond just 'natural' disasters and should consider 'unplanned events' such as power cuts and significant pipe failure. (3) Reporting on revenue needs to be carefully considered for its relevance to Environment Performance Measures.

Data and Performance Measures

135. The Water Services Act 2021 requires staff to be skilled and competent to operate networks in a way that public health (and environmental safety) is protected. A measure could be developed to monitor water industry competency.
136. Fire hydrants only have a measure that relates to the number tested. Staff consider that 'firefighting pressure' and 'volume' should be included as a measure to further understand ability to be resilient.
137. Measures that will 'drive improved performance' will be important to realizing the benefit of reform. This includes measures such as the rate of asset data collection, model attributes (coverage of both networks and plants, model currency and calibration), or risk assurance maturity.
138. Outcomes and Principles have been previously discussed, some of which consider partnership and engagement and the Four Well Beings. Staff observe that there is currently no performance measure that would show the extent to which partnership and engagement is occurring, and how well being is being enhanced. Staff recommend that further consideration is given to how this may be measured.
139. Staff also question some measures that refer to customer vs property. For example, staff consider that the measure for system interruptions should be property based, rather than customer based, as it is sometimes difficult to determine the number of customers. A property-based measurement would also have the better focus on system resilience.

Further Information and Opportunity to Discuss Our Submission

140. Should Taumata Arowai require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Paula Brown** (Water Compliance Specialist - City Waters) on 07 838 6549 or 021 846 981, email paula.brown@hcc.govt.nz in the first instance.
141. Hamilton City Council staff would welcome the opportunity to discuss the content of our submission with Taumata Arowai in more detail and be involved in further targeted consultation.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

APPENDIX 1
SUBMISSIONS MADE BY HAMILTON CITY COUNCIL IN THE THREE WATERS SPACE
FEBRUARY 2007 - FEBRAURY 2022

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT	DOWNLOAD SUBMISSION
		COUNCIL	STAFF		
Three Waters Reform	The Working Group on Representation, Governance and Accountability of new Water Service Entities	✓		4/02/22	Download Now
Economic Regulation and Consumer Protection for Three Waters Services in New Zealand (27 October 2021 Discussion Paper)	Ministry of Business, Innovation and Employment	✓		16/12/21	Download Now
Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill. NB: this is a joint submission made on behalf of Hamilton City Council and the Future Proof Partners (i.e., Hamilton City Council; Waikato District Council; Waipā District Council; Waikato Regional Council; and Waikato Tainui)	Parliament's Environment Select Committee	✓		16/11/21	Download Now
Managing our Wetlands - A Discussion Document on Proposed Changes to the Wetlands Regulations	Ministry for the Environment		✓	27/10/21	Download Now
Three Waters Reform Formal Feedback to Government: A) Cover letter to Minister of Local Government B) Formal feedback to Government	Hon Nanaia Mahuta (Minister of Local Government); LGNZ; Department of Internal Affairs	✓		1/10/21	Download A) Download B)
Proposed Cost Recovery Fees and Charges Under Water Services Bill Regulations	Department of Internal Affairs		✓	20/08/21	Download Now
Inquiry on the Parliamentary Paper on the Exposure Draft - Natural and Built Environments Bill	Parliament's Environment Committee	✓		4/08/21	Download Now
Government Policy Statement on Housing and Urban Development (GPS-HUD) - June 2021 Discussion Document	Ministry of Housing and Urban Development	✓		3/08/21	Download Now Download Now
Waikato District Council's Review of the Water Supply Bylaw 2014	Waikato District Council		✓	15/07/21	Download Now
Waikato District Council's Proposed Stormwater Bylaw 2021	Waikato District Council		✓	15/07/21	Download Now
Review of Waipa District Council's Trade Waste Bylaw (2011) and Wastewater Drainage Bylaw (2011)	Waipa District Council		✓	5/07/21	Download Now

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT	DOWNLOAD SUBMISSION
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Infrastructure for a Better Future: Aotearoa New Zealand Infrastructure Strategy (May 2021 Consultation Document)	New Zealand Infrastructure Commission	✓		2/07/21	Download Now
Inquiry into Supplementary Order Paper No. 38 on the Health (Fluoridation of Drinking Water) Amendment Bill	Parliament's Health Committee		✓	18/06/21	Download Now
Government Three Waters Reform: Hamilton City Council Feedback to LGNZ	Local Government New Zealand	✓		10/06/21	Download Now
Early Engagement on Resource Management Reform - Opportunities to Improve System Efficiency	Ministry for the Environment		✓	21/05/21	Download Now
Watercare Waikato River Take Application	Environmental Protection Authority	✓		26/03/21	Download Now
Water Services Bill	Parliament's Health Committee	✓		26/02/21	Download Now
APP139736 - Fonterra Cooperative Group Limited - Hautapu Site - Resource Consent Applications	Waikato Regional Council		✓	31/07/20	Download Now
Appeal Against Decisions of the Waikato Regional Council on Proposed Plan Change 1 to the Waikato Regional Plan	Waikato Regional Council	✓		7/07/20	Download Now
Infrastructure Funding and Financing Bill	Parliament's Transport and Infrastructure Committee	✓		13/03/20	Download Now
Proposed National Policy Statement for Indigenous Biodiversity	Ministry for the Environment	✓		5/03/20	Download Now
Taumata Arowai - The Water Services Regulator Bill	Parliament's Health Committee	✓		28/02/20	Download Now
Urban Development Bill	Parliament's Environment Committee	✓		13/02/20	Download Now
Transforming the Resource Management System: Opportunities for Change: Issues and Options Paper (November 2019)	Ministry for the Environment	✓		10/02/20	Download Now
Draft Growth and Economic Development Strategy - Waikato 2070	Waikato District Council	✓		24/01/20	Download Now

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		COUNCIL	STAFF		
Cambridge Wastewater Treatment Plant Discharge Consent Application - Waipa District Council (APP141113)	Waikato Regional Council	✓		19/12/19	Download Now
Hamilton City Council Statement of Evidence for 19/10/20 Hearing: Cambridge Wastewater Treatment Plant Discharge Consent Application - Waipa District Council (APP141113)	Waikato Regional Council	✓		19/10/20	Download Now
Action for Healthy Waterways: A Discussion Document on National Direction for Our Essential Freshwater	Ministry for the Environment	✓		31/10/19	Download Now
Infrastructure Funding and Financing Information Paper – Development Contributions and Targeted Rates	Department of Internal Affairs		✓	25/10/19	Download Now
Discussion Document on a Proposed National Policy Statement for Highly Productive Land	Ministry for Primary Industries/Ministry for the Environment	✓		17/10/19	Download Now
Discussion Document on a Proposed National Policy Statement on Urban Development	Ministry for the Environment	✓		17/10/19	Download Now
Draft Report on Local Government Funding and Financing	New Zealand Productivity Commission	✓		13/09/19	Download Now
Further Submissions on the Submissions to the 2018 Waikato Proposed District Plan (Stage 1)	Waikato District Council	✓		15/07/19	Download Now
Waipa District Council's Proposed Stormwater Bylaw 2019	Waipa District Council		✓	21/06/19	Download Now
New Zealand Infrastructure Commission/Te Waihangā Bill	Parliament's Finance and Expenditure Committee		✓	17/05/19	Download Now
Local Government Funding and Financing Inquiry	New Zealand Productivity Commission	✓		15/03/19	Download Now
Formation of a New Independent Infrastructure Body (October 2018 Consultation Document)	Treasury		✓	26/10/18	Download Now
Three Waters Review	Minister for Local Government	✓		23/10/18	Download Now
Proposed District Plan	Waikato District Council	✓		9/10/18	Download Now
LGNZ Three Waters Survey	Local Government New Zealand	✓		20/09/18	Download Now
Further Submissions to the Healthy Rivers Plan Change: Proposed Plan Change 1 and Variation 1	Waikato Regional Council	✓		17/09/18	Download Now

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Draft National Planning Standards Consultation Document	Ministry for the Environment		✓	14/08/18	Download Now
Application for Resource Consents (APP137797) by Fonterra Limited for the Continued Operation of the Te Rapa Milk Processing Site, Waikato Region	Waikato Regional Council	✓		3/07/18	Download Now
Waikato Regional Council's Draft 2018-2028 Long Term Plan	Waikato Regional Council	✓		20/04/18	Download Now
Hamilton City Operative District Plan October 2017 Proposed Plan Change 2 - Te Awa Lakes Private Plan Change	Hamilton City Council	✓		29/11/17	Download Now
Regional Infrastructure Technical Specifications	Waikato Local Authority Shared Services		✓	02/10/17	Download Now
Clean Water: 90% of Rivers and Lakes Swimmable by 2040	Ministry for the Environment	✓		05/05/17	Download Now
Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments	Waikato Regional Council	✓		02/03/17	Download Now
The Health (Fluoridation of Drinking Water) Amendment Bill	Parliament's Health Committee	✓		09/02/17	Download Now
Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments (Waikato Healthy Rivers Wai Ora Project)	Waikato Regional Council	✓		23/08/16	Download Now
Local Government Act 2002 Amendment Bill (No 2)	Parliament's Local Government and Environment Committee	✓		5/08/16	Download Now
Late Submission to the Ruakura Variation to Hamilton City's Proposed District Plan	Hamilton City Council	✓		6/07/16	Download Now
Alteration of Designation - Resolution Drive Extension and Horsham Downs Link Road	Waikato District Council	✓		5/05/16	Download Now
'Next Steps for Freshwater' Consultation Document (February 2016)	Ministry for the Environment	✓		29/04/16	Download Now
Waikato Regional Council's 2016-17 Proposed Annual Plan Consultation Document	Waikato Regional Council	✓		5/04/16	Download Now
Final Position Paper 'Improving New Zealand's Water and Wastewater and Stormwater Sector'	Local Government New Zealand	✓		30/10/15	Download Now
Notice of Requirement: Designation by NZ Transport Agency - State Highway 26/Ruakura Road/Lisette Road Roundabout	Waikato District Council	✓		4/09/15	Download Now

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17 June 2015 Draft Report 'Using Land for Housing'	New Zealand Productivity Commission	✓		4/08/15	Download Now
Draft Waikato District Development Strategy (May 2015)	Waikato District Council		✓	16/07/15	Download Now
Water Legislation Reform Discussion Paper	Water New Zealand		✓	22/04/15	Download Now
Draft Implementation Guide for the National Policy Statement for Freshwater Management 2014	Ministry for the Environment		✓	3/12/14	Download Now
NZTA's Notices of Requirement to Alter Existing Designations for the Waikato Expressway (Hamilton Section) to Accommodate Ruakura Interchange and Connecting Roads	Rice Resources Ltd	✓		22/10/14	Download Now
Further Amendments to the National Policy Statement for Freshwater Management 2014	Ministry for the Environment		✓	11/09/14	Download Now
Draft Waikato District Council Water Supply Bylaw 2014	Waikato District Council		✓	23/05/14	Download Now
Proposed Auckland Unitary Plan	Auckland Council	✓		28/02/14	Download Now
Proposed Amendments to the National Policy Statement for Freshwater Management 2011: A Discussion Document	Ministry for the Environment		✓	4/02/14	Download Now
Waipa District Council's Proposed Water Supply Bylaw 2013	Waipa District Council	✓		12/07/13	Download Now
Waikato-Tainui Environmental Plan (Latest Draft)	Waikato-Tainui	✓		24/06/13	Download Now
Housing Accords and Special Housing Areas Bill	Social Services Select Committee	✓		30/05/13	Download Now
Waikato Regional Council's Draft 2013/14 Annual Plan	Waikato Regional Council	✓		17/04/13	Download Now
Freshwater Reform 2013 and Beyond	Ministry for the Environment	✓		8/04/13	Download Now
Improving our Resource Management System	Ministry for the Environment	✓		2/04/13	Download Now
Hamilton City's Proposed District Plan	Hamilton City Council	✓		28/03/13	Download Now
Development Contributions Review Discussion Paper (February 2013)	Department of Internal Affairs	✓		22/03/13	Download Now
Draft Waikato Conservation Management Strategy 2014-2024	Department of Conservation	✓		15/03/13	Download Now
Environmental Management Plan for Waikato-Tainui (Working Draft Discussion Document)	Waikato-Tainui		✓	04/03/13	Download Now
Consultation on Local Government Mandatory Performance Measures	Department of Internal Affairs		✓	28/02/13	Download Now
Draft Waikato Regional Council Navigation Safety Bylaw 2013	Waikato Regional Council		✓	23/02/13	Download Now
Plan Change 3 – Tamahere Structure Plan	Waikato District Council	✓		28/08/12	Download Now

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Waikato District Council's Draft 2012-22 Long Term Plan; Waikato District's Draft Waste Management and Minimisation Plan 2012	Waikato District Council	✓		9/05/12	Download Now
Waikato Regional Council's Draft 2012-2022 Long Term Plan	Waikato Regional Council	✓		1/05/12	Download Now
Draft Auckland Plan	Auckland Council	✓		31/10/11	Download Now
Waikato Regional Council's Proposed Regional Policy Statement - Further Submission	Waikato Regional Council	✓		15/07/11	Download Now
Auckland Spatial Plan Discussion Document ('Auckland Unleashed')	Auckland City Council	✓		30/05/11	Download Now
Waikato Regional Council's Draft 2011/2012 Annual Plan	Waikato Regional Council	✓		26/04/11	Download Now
Waipa District Council's Draft 2011/2012 Annual Plan	Waipa District Council	✓		15/04/11	Download Now
Environment Waikato's Proposed Regional Policy Statement	Waikato Regional Council	✓		28/02/11	Download Now
Building Competitive Cities: Reform of the Urban and Infrastructure Planning System	Ministry for the Environment	✓		17/12/10	Download Now
Local Government Act (LGA) 2002 Amendment Bill	Local Government and Environment Select Committee	✓		18/06/10	Download now
Local Government Act (LGA) 2002 Amendment Bill – SOLGM's Draft submission	Society of Local Government Managers (SOLGM)	✓		11/06/10	Download now
Waipa District Council Draft 2010/11 Annual Plan	Waipa District Council	✓		19/04/10	Download now
Regional Policy Statement Review - Working Draft	Environment Waikato	✓		26/02/10	Download now
Waikato-Tainui Ruapatu Claims (Waikato River) Settlement Bill	Maori Affairs Select Committee	✓		19/02/10	Download now
Proposed Private Plan Change No.67 - Meridian 37 Ltd	Waipa District Council	✓		29/01/10	Download now
Waipa Draft Environment Strategy	Waipa District Council	✓		24/11/09	Download now
Waste Minimisation Discussion Document	Ministry for the Environment	✓		19/05/09	Download now
Environment Waikato's Regional Policy Statement Review	Environment Waikato	✓		8/05/09	Download now
Environment Waikato's Draft 2009-19 LTCCP	Environment Waikato	✓		20/04/09	Download now
Resource Consent Application from Fonterra re Wastewater Discharge	Waikato Regional Council	✓		18/03/09	Download now
Waikato-Tainui Raupatu Claims (Waikato River) Settlement Bill	Maori Affairs Select Committee	✓		13/02/09	Download now
National Policy Statement (NPS) for Freshwater Management	National Policy Statement (NPS) for Freshwater Management	✓		23/01/09	Download now

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National Environmental Standard on Ecological Flows and Water Levels	Ministry for the Environment	✓		29/08/08	Download now
Waikato District Council - Southern Districts Water Supply	Environment Waikato	✓		30/07/08	Download now
Proposed Vision for the Waikato River	Guardians Establishment Committee	✓		23/05/08	Download now
Waste Minimisation (Solids) Bill	Local Government and Environment Select Committee	✓		2/11/07	Download now

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