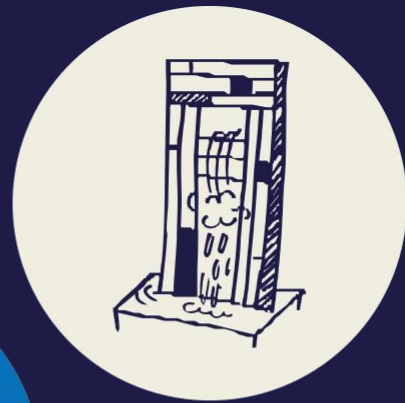


HAMILTON CITY COUNCIL – STAFF SUBMISSION

Second Tranche of Drinking Water and Wastewater Network Environmental Performance

Taumata Arowai



9 December 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 staff submission was approved by Hamilton City Council's Chief Executive on 9 December 2022.

Hamilton City Council Reference D-4442833 - Submission # 711.

It should be noted that the following submission is from staff at Hamilton City Council and does not necessarily represent the views of the Council itself.

Key Messages and Recommendations

1. Hamilton City Council staff support the purpose and provisions of the second tranche of **Drinking Water and Wastewater Network Environmental Performance**.
2. Notwithstanding this, Hamilton City Council staff wish to highlight several points to Taumata Arowai, including recommendations on how to address the concerns of staff.
3. Staff have significant concerns about how performance data will be provided at a time where the industry is undergoing significant change. Subsequently, recommendations relating to the phasing have been provided.
4. Practical application of the data collected is not made clear to the network operators. More guidance is requested on the proposed use of the data collected.
5. Definitions are yet to be provided, despite these influencing how network operators may comply with the proposed environmental reporting. Hamilton City Council staff seek the distribution of definitions to support the measures for consultation. Hamilton City Council staff are keen to contribute to the development and feedback of these definitions.
6. The accuracy of reported data does not appear to be considered within the Network Environmental Performance Discussion Document. Hamilton City Council staff recommend that a mechanism to report on 'data confidence' is included as part of both drinking water and wastewater measure reporting. In addition, we would like to see Taumata Arowai outline preferred assessment methods for measures where there may be different methodologies in obtaining data.
7. All measures under the insight 'Services are economically sustainable' should be deferred until 2025 at the earliest to ease the burden of exceptionally high workloads over the Three Waters Transition Period (1st July 2024), and to ensure a high degree of data accuracy from network operators.
8. Hamilton City Council staff wish to highlight the onerous reporting requirements relating to resource management compliance. Hamilton City Council staff recommend all measures associated with resource consent compliance are reviewed.
9. Hamilton City Council staff wish to highlight the implications on data reporting as a result of the National Transition Unit. Hamilton City Council staff recommend the deferral of all measures over and above Water New Zealand's' National Performance Reporting until after the Three Waters Reform transition period.
10. Hamilton City Council staff have included more specific and targeted feedback on the wastewater measures (**Table 1**) and drinking water measures (**Table 2**) below.
11. Hamilton City Council staff are keen to have further engagement on the next round of consultation, which staff understand will be targeted consultation.

Introduction

12. Hamilton City Council staff (staff) appreciate the opportunity to make a submission to the second tranche of **Drinking Water and Wastewater Network Environmental Performance** (hereafter referred to as the 'Discussion Document').
13. Overall, we support the intent of the proposed data reporting by Taumata Arowai outlined in the Discussion Document.
14. Hamilton City Council provides water, wastewater and stormwater services to New Zealand's fourth largest city, with a population of 179,900 at June 2022 (Stats NZ). Hamilton's urban water services are heavily reliant on the Waikato Awa, being the only surface water source located within our territorial boundary.
15. 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).
16. Wastewater from 55,000 households and 5,000 commercial and industrial sites is collected and treated at the Pukete Wastewater Treatment Plant. This is Hamilton's only wastewater treatment plant.
17. Staff take a considerable interest in matters regarding Three Waters and have made numerous submissions in this space in recent years - refer **Appendix 1**. All submissions made by Hamilton City Council can be [accessed here](#).
18. Staff have previously submitted on the First Tranche of measures outlined in the first Network Environmental Performance document. This First Tranche focused on drinking water measures within Years 1 to 3. The 28 March 2022 staff submission can be [accessed here](#). Several points are still applicable and have been reiterated in this submission on the Discussion Document.
19. Staff also wish to reiterate their significant concerns about how performance data will be provided at a time where the industry is undergoing significant change. This is an underlying theme with a large proportion of the commentary as part of this submission.
20. This submission is broken down into general comments on the Discussion Document which relate to both the drinking water and wastewater measures (*questions 41 - 44*). This is followed by more specific commentary on the wastewater measures (*questions 20 - 40*) and the drinking water measures (*questions 10 - 16*).
21. Staff note that Taumata Arowai is seeking interest from parties who wish to be further involved in the drafting of individual measures and data points (*Question 41, 42*). Staff are keen to be included as part of further targeted consultation.

General Comments

22. Staff are generally supportive of the intent of the Discussion Document. The requirement to report on environmental performance is a positive step forward for the water sector. The reporting should achieve greater transparency on the performance of networks and the impacts on public health and the environment.
23. However, staff wish to highlight several points which relate to the requirement of environmental reporting overall:
 - Practical application of the data collected is not made clear to the network operators.

- Definitions are yet to be provided, despite these influencing how network operators may comply with the proposed environmental reporting.
- The accuracy of reported data does not appear to be considered within the Discussion Document.
- All economic measures should be deferred until 2025 at the earliest.
- Exceptionally onerous reporting requirements of resource management compliance.
- The implications of the transition process on data reporting by network operators.

24. Each of these points are discussed in detail below.

The practical application of data is not clear

25. The Discussion Document provides a high-level explanation of the use of the data collected by network operators. However, aside from publishing the data annually, the Discussion Document lacks detail on how the reporting will be used to meet the outcomes of environmental reporting, and waters reform as a whole.
26. For example, the Discussion Document states that the requirements to report data will be used to *“understand how networks across the country are performing and transparency around where investment may be needed”*.
27. Reporting this data will highlight the issues and achievements of the network operators. However, how does Taumata Arowai plan to practically use this data to inform investment decisions? Does Taumata Arowai plan to report on where investment is recommended? How often will this be undertaken? Will this be made available to the public? Or will this inform future iterations of drinking water and wastewater standards, thus guiding investment decisions by network operators?
28. It is important for a network operator to know why they are collecting the data, what the future use of it is likely to be, and the value it will provide.
29. **Relief sought: More information to be provided on the proposed use of the data collected.**

Definitions need to be provided before reporting measures becomes mandatory

30. A common theme over both the drinking water and wastewater measures and data points is the need for clear definitions.
31. Aside from the definitions of ‘Environmental Performance’ and ‘Wastewater Treatment Plants’, the Discussion Document does not provide any definitions for terms used within the measures and data points. This relates to both the drinking water and wastewater measures.
32. It is critical for clear definitions to be provided to ensure that network operators report consistent and accurate data to Taumata Arowai. Consequently, comparing inaccurate data to understand the performance of network operators will be a challenging exercise for Taumata Arowai. It will also result in skewed and inaccurate conclusions being drawn.
33. Some examples include:
- Wastewater Pump Stations: Does this include both publicly and privately owned pump stations that interact with the wastewater network operated by the network operator? What about privately owned but publicly operated?
 - Critical Assets: The definition of critical assets could vary widely. From a holistic perspective all assets could be considered critical from a lifeline utilities perspective.

- Unplanned interruptions: An unplanned interruption could be the interruption of services as a result of a fault or damage to the network. It could also mean an interruption resulting from planned works which extend beyond a planned interruption. Is Taumata Arowai interested in both?
34. Early provision of definitions will enable network operators to:
- Provide meaningful feedback on whether the information required to be reported can be provided.
 - Identify whether there are any gaps in the measures, or where information may not be possible to provide.
 - Understand systems and processes that may be required to enable accurate information to be reported.
35. The definitions which support Water New Zealand's National Performance Reporting (NPR) are considered to be a good starting point. Staff have noted that the Year 1 wastewater measures are based on this. However, staff caution the direct application of these definitions to the proposed measures. Staff note that the 2021/22 definitions contain issues which make the collection and provision of information difficult. Examples include the definitions of 'interruption' and 'Asset Failure'.
36. It is also considered important to ensure that the definitions remain consistent throughout the life of the network performance reporting measures. We have observed that some NPR definitions have changed over time, which has made data comparison challenging. This risk could be alleviated by releasing supporting definitions to network operators for consultation at an early stage.
37. **Relief sought: The distribution of definitions to support the Network Environmental Performance measures for consultation. Staff are keen to contribute to the development and feedback of these definitions.**

The Discussion Document remains silent on the accuracy of the measured data

38. As well as the data itself, the accuracy and confidence of reported data needs to be a consideration by Taumata Arowai. This is especially important if the performance of network operators is to be assessed using the data. This is something which the Discussion Document remains silent on.
39. This is a concern for a number of measures within the Discussion Document which are not measured, and will need to be based on estimations, modelling, or educated guesses. Such examples include trade waste volumes, wastewater overflow volumes, and drinking water screenings.
40. To ensure the success of the measures, there needs to be a mechanism which allows network operators to report on the confidence of the information provided.
41. The primary benefit of such a mechanism is increased transparency for both Taumata Arowai and the general public on the performance of network operators. Other benefits include:
- Understanding what benefit each of the measures are actually providing (i.e., is the information collected accurate enough to be able to inform any decisions or conclusions); and
 - Enabling the ability for Taumata Arowai to focus on investment decisions to improve the accuracy of data collection where it is poor.
42. **Relief sought: That a mechanism to report on 'data confidence' is included as part of both drinking water and wastewater measure reporting.**

43. There are several data points that will require the network operator to use an assessment method found in specific practice documents.
44. An example within Year 1 of the wastewater measures is how to measure process emissions. Currently, there are two sets of assessment criteria found which could be used to measure process emissions: Water New Zealand Standard Methods and the IPCC guidelines.
45. Both sets of guidelines will issue different results, however both can be used to measure process emissions. Consequently, any data collected by Taumata Arowai may not be based on the same assessment. This may not result in an accurate comparison if used to assess the performance of the network operators.
46. Where a specific measurement requires specific practice to be followed, it is recommended that Taumata Arowai specify the preferred methodology to obtain that information.
47. **Relief sought: Taumata Arowai to outline preferred assessment methods for measures where there may be different methodologies in obtaining the information.**

All economic measures should be deferred until 2025 at the earliest

48. Staff recommend that all measures under the 'Services are Economically Sustainable' insight should be delayed until July 2025 at the earliest. This includes both the wastewater measures and Year 2 drinking water measures.
49. The measures as drafted requires a water service operator to provide data on the expenditure and revenue from the previous year, as well as forecast for the foreseeable future.
50. As iterated within paragraph 19 above, this is a time of uncertainty and change for many network operators. This is relevant when noting the timing of both Year 2 wastewater measures and Year 2 drinking water measures relating to economic sustainability. Both will occur during a time where there is much uncertainty behind who will be operating and making investment decisions in relation to water services.
51. Under the Government's Three Waters Reform programme, the water service entities are proposed to commence operation of waters infrastructure on the 1st of July 2024. At this point, the water service entities (as network operators) would be required to report on the expenditure and revenue of predeceasing councils. Similarly, councils will be required to forecast the potential expenditure for infrastructure that they may not have control over.
52. In addition to this, the future proposed Economic Regulator is expected to have both influence over revenue and expenditure of a future water service entity, as well as have their own reporting requirements.
53. Staff suggest shifting all economic measures out to July 2025 at the earliest. The delay in reporting on economic measures will ensure more certainty around the data that is collected, as opposed to the uncertainty which exists now. Staff will also be able to align economic reporting requirements required by the new Economic Regulator.
54. **Relief sought: All performance measures under 'Services are Economically Sustainable' are deferred to July 2025 at the earliest, and consideration is given to the value these measures provide above what Economic regulation would achieve.**

Resource consent measures are exceptionally onerous on network operators

55. Staff note that Taumata Arowai has included resource consent compliance measures for both drinking water and wastewater for all years.

56. Generally speaking, Hamilton City Council staff support the requirement to provide data relating to resource consent compliance measures. However, staff consider that these need further refinement.
57. Resource consent holders are required to self-monitor their discharge and water take activities; however, it is the consent authority who makes the final decision on compliance status. It is the consent authority who is the one source of truth, therefore this information should be sourced from the consent authority as opposed to the network operator.
58. The consent authority will also be able to provide more accurate information with regards to wet weather overflow activity status and permitted activity breaches. Network operators don't necessarily have in-house planners to rely on providing consistent advice on permitted activity compliance, or to provide a planning assessment against regional plans.
59. It should also be noted that there does not seem to be any limitation to the types of resource consents which Taumata Arowai is interested in knowing about. Although the treatment plants may have a limited number of resource consents, there is a potential for a significant number of resource consents to be associated with the urban waters network.
60. Examples of likely Hamilton scenarios include:
 - A resource consent from the territorial authority for minor vegetation clearance associated with network asset renewals.
 - A resource consent for several activities (earthworks, discharge, land use) for the remediation of a streambank which has failed and compromised the water network.
 - A resource consent to disturb contaminated land to renew the wastewater network.
 - A resource consent to trim a notable tree which is overhanging a roof access point for a reservoir.
61. There are also numerous resource consents held by network operators which are in situ. This could apply to resource consents that have either not been given effect to, or the activity has been completed but not surrendered.
62. With the above in mind, measures associated with resource consent compliance require a significant amount of effort. Although this might be understandable for the principal activities (such as a wastewater discharge and water take consent), the measures do not differentiate these from the rest of the consents that a network operator may hold.
63. If the measure is focused on the principal activities to which resource consent is generally held for at the treatment plants (i.e., the municipal wastewater discharge consents and water take consents), then this clarity needs to be provided for in the measures.
64. **Relief sought: All performance measures associated with resource consent compliance are reviewed and amended to only relate to principal activities (such as municipal wastewater discharge consents and water take consents).**
65. In addition, the measures remain silent on designations and the associated approvals, such as notice of requirements, outline plans and outline plan waivers. A majority of treatment plants and other sites of significant infrastructure around New Zealand are designated, and don't conform to a conventional consenting process.
66. If the intent of Taumata Arowai is to capture all information associated with resource management approvals, then this appears to be a significant omission. Consequently, these generally do not have land use contents associated with the site.
67. **Relief sought: Performance measures associated with designations are included for both wastewater and drinking water.**

National Transition Unit, and the implications of the transition on data collection by network operators

68. Staff’s previous submission on Tranche 1 of the Network Environmental Performance measures discussed the implications on data collection as a result of the Three waters Reform transition. In summary, there is a likelihood that the National Transition Unit would establish new data capture and reporting systems that will operate under the new entities. This submission point is still relevant for the Second Tranche of measures.
69. Hamilton City Council is already expected to expand the current reporting and data collection regime as part of the network environmental performance. The Second Tranche of the measures provided within the Discussion Document will only exacerbate this expectation. This will result in network operators needing to invest resources and funding to develop new data capture and reporting processes. These may become redundant if the proposed transition to the new entities occurs.
70. Staff note that the NPR has been used as a framework to prepare the proposed measures within the Discussion Document. It is therefore assumed that a majority of network operators are already able to provide this information.
71. Staff recommend that expanded reporting requirements are delayed until after the transition period (July 2024), when there will be more certainty about the organisation structure under which Three Waters services will be provided. The expanded reporting requirements are considered by staff to consist of measures over and above what is currently collected as part of the NPR.
72. Benefits to this delay include:
- 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 two years.
 - Workload on network operators can be managed during a time of significant change.
 - Alignment with expected Economic Regulator reporting requirements (refer above).
 - Ensure any phasing aligns to other reporting imposed on water suppliers by other organisations.
73. **Relief sought: Defer all measures over and above the NPR until after the proposed transition period (1st July 2024).**

Wastewater Environmental Performance Measures

74. **Table 1** below provide more feedback on some of the individual wastewater environmental performance measures.

Table 1: Staff Commentary on Wastewater Measures within the Discussion Document

Measure or Data Point (Question)	Comment	Relief Sought
Volume of trade waste at treatment plant (Question 25)	Hamilton City Council do not currently quantify all trade waste discharge volumes into the network. This is usually reserved for a class of trade waste consent holders (these are known in the Hamilton context as ‘conditional discharges’ and those with a ‘trade waste agreement’). A whole suite of trade waste customers are ‘permitted’ or ‘permitted pre-treatment’ and are not required to provide volumes. These include the likes of bakeries, restaurants, barbers, hairdressers, and many others. For these customers, it would be particularly onerous for them to measure trade waste flows from their site.	Removal of “volume of trade waste at treatment plant” as a measure. Deferral of all ‘trade waste’ related measures until Year 3.

Measure or Data Point (<i>Question</i>)	Comment	Relief Sought
	<p>Undertaking calculations to determine trade waste flow into the treatment plant is possible, but the confidence of the information is likely to be low. This is due to the variety of activities who produce trade waste, and the variability of domestic waste attributed to trade waste premises.</p> <p>Furthermore, a potential of water services being transferred to an entity is likely to result in a more consistent approach to how trade waste is managed and regulated. If the outright removal of trade waste measures is not considered viable by Taumata Arowai, staff consider that trade waste measures should be deferred until after the transition period. This will ensure that there will be a more consistent approach to trade waste management over the country, as well as consistency in classification of different dischargers.</p>	
<p>Wet Weather Regulation overflow approach under local regional plan</p> <p>(<i>Question 25</i>)</p>	<p>Network operators don't necessarily have in-house planners to rely on providing a planning assessment against regional plans to determine this measure.</p> <p>The consent authority will be able to provide a consistent answer to this question for an entire region. The consent authority will also be able to take into consideration any matters (such as legal advice or Environment Court rulings) which may influence the activity status.</p>	<p>Remove measure 'Wet Weather Regulation overflow approach under local regional plan'.</p>
<p>Wastewater overflows (Year 1) – Provision of complete information</p> <p>(<i>Question 25</i>)</p>	<p>Wastewater overflows are variable in nature. There can be small overflows that are reported frequently but do not discharge large quantities of wastewater into the environment, or large overflows which occur infrequently (e.g., once or twice a year) but could have significant environmental impacts. They can be reported and resolved in a matter of hours or remain unreported and could discharge over a period of days.</p> <p>The variability of what an overflow actually is means that a clear and concise definition is needed.</p> <p>The current measures on wastewater overflows are quantitative, and do not allow for the context behind wastewater overflows to be provided. Staff consider that a more 'qualitative' approach to measuring overflows would be more appropriate.</p>	<p>Review of Wastewater Overflows (Year 1) measures, considering the following:</p> <ul style="list-style-type: none"> • Definitions of 'Overflow' is provided. • That only reported 'overflows' over the reporting year are considered. • A more qualitative approach to reporting overflows which enables the network operator to provide context. • Overflows that originate and occur in private property are excluded from the measures.
<p>Wastewater overflows (Year 1) – Cause of overflow</p> <p>(<i>Question 25</i>)</p>	<p>Multiple overflows can be reported due to a single 'cause' of an overflow. This can result in multiple overflows being reported. For example, a single blockage can potentially cause more than one overflows out of multiple manholes or gully traps and may be reported by the public multiple times.</p> <p>Is Taumata Arowai expecting information on the blockage from a single overflow event, or multiple overflow events being reported? Considering this, would network operators be expected to report</p>	

Measure or Data Point (Question)	Comment	Relief Sought
	<p>flows and timing on each overflow (considering the Year 2 wastewater overflow measures)?</p> <p>Furthermore, this may also trigger overflows on multiple private properties. This could result in a double up on reporting.</p>	
<p>Wastewater overflows (Year 1) – General (Question 25)</p>	<p>Network operators can only provide information on overflows that it knows about. Hamilton City Council has a very large network, and it is not considered possible to know about every single event happening at every single time. The wording around ‘overflows’ should only relate to ‘reported’ overflows.</p>	
<p>Compliance with Resource Consent Conditions, and Breaches of Permitted Activity Rules (Question 26)</p>	<p>Resource consent holders are required to self-monitor their discharge and water take activities; however, it is the consent authority who makes the final decision on compliance status. As such, this information is better sought from the consent authorities as opposed to the individual network operators.</p> <p>The consent authority will also be able to provide Taumata Arowai with the network operators breaches of Permitted Activity rules.</p>	<p>Remove measure ‘Compliance with Resource Consent Conditions’, and ‘Breaches of Permitted Activity Rules’.</p>
<p>Wastewater overflows (Year 2) – Overflow Receiving Environment (Question 26)</p>	<p>Wastewater overflows can have multiple receiving environments. For example, an overflow that occurs on private properties can discharge into a stormwater device before arriving at a body of water. Alternatively, a single blockage causing overflows at multiple points can have multiple receiving environments.</p> <p>Does each receiving environment get reported as individual overflows or will there be a criteria tool to determine the receiving environment? This could result in either over or under reporting.</p>	<p>Guidance provided to network operators on how to report on the receiving environment of network overflows.</p>
<p>Wastewater overflows (Year 2) – Estimated Volume and Overflow Time (Question 26)</p>	<p>The reliability for this measure will be very low and highly labor intensive. In Hamilton’s experience, volumes and time of a single source overflow (one blockage causing one overflow) takes on average four to six hours of staff time. This information is based on a number of assumptions and staff experience to determine, and also bringing in the wider issue of the accuracy of data (discussed in paragraphs 38 to 47 above).</p> <p>Currently, staff only perform this activity in instances of plant failure or major overflow events. Should we apply this approach to every single overflow, it would result in significant financial and time burden on the operations and response teams.</p> <p>A way to alleviate this issue is for Taumata Arowai to include a threshold where this information will be required. Alternatively, a guide should be provided to network operators which will provide a standardised approach to estimating overflows.</p>	<p>Review of the measures ‘Estimated Volume and Overflow Time’, considering the effort required and accuracy of data.</p> <p>Standardisation of measurement approach relating to overflows.</p>

Measure or Data Point (Question)	Comment	Relief Sought
Environmental Monitoring (Question 26)	Confirmation of the scope of environmental monitoring is sought. Is Taumata Arowai seeking details of the types of environmental monitoring undertaken by network operators? Do Taumata Arowai want to be aware of the results of environmental monitoring?	Guidance provided to network operators on how to report on Environmental Monitoring.
Greenhouse gas emissions (Question 32)	Staff note that more national guidance needs to be provided on how to measure greenhouse gas emissions. This applies to both capital and operational greenhouse gas emissions.	Advocate for national guidance on measuring greenhouse gas emissions.
New Measure: Cross connections (Question 38)	<p>A cross connection is where a wastewater connection from private property has been incorrectly connected into the stormwater network, and vice versa.</p> <p>Based on assumptions made on 2.7 persons per dwelling producing 200L of wastewater per person, a single cross connection:</p> <ul style="list-style-type: none"> Discharges approximately 200m³ of wastewater into the stormwater network, per year; and Discharges more than 150m³ of stormwater into the wastewater network, per year. <p>This measure aligns with the scope of environmental performance, being the protection of public health and safety and source water.</p>	The addition of qualitative measures relating to Cross Connections within Wastewater Year 3. This may include the number of cross connections discovered and the number of cross connections remediated.
New Measure: Number of Manholes (Question 38)	Staff recommend the number of manholes included as a performance measure. This provides a generalisation on the complexity of a network.	The addition of 'Number of manholes' as a new wastewater measure.

Drinking Water Environmental Performance Measures

75. **Table 2** below provide more feedback on some of the individual year 2 Drinking Water environmental performance measures.

Table 2: Staff Commentary on Drinking Water Measures within the Discussion Document

Measure or Data Point (question)	Comment	Relief Sought
Compliance with Resource Consent Conditions, and Breaches of Permitted Activity Rules (Question 10)	Refer paragraphs 57 to 59.	Remove measure 'Compliance with Resource Consent Conditions', and 'Breaches of Permitted Activity Rules'.

Measure or Data Point (question)	Comment	Relief Sought
<p>Drinking Water Byproducts (Question 10)</p>	<p>Staff will be able to provide a majority of the information requested by this performance measure. However, the one data point which we will not be able to provide is screenings (tonnes).</p> <p>The Waioara Water Treatment Plant has a single intake structure, with the source water being the Waikato River. Staff are required to clear the entire structure of a variety of debris regularly, ranging from plant material, debris, and rubbish to name a few.</p> <p>The intake screen pushes debris back into the river via scrapers. If safe, staff will retrieve any rubbish that blocks the intake. However, at no point is the weight of screenings measured. The measuring of screenings would require a shift in process, including the need for capital upgrades to ensure the health and safety of staff.</p> <p>Finally, staff query the usefulness of this information, and what it will actually be used for.</p>	<p>Either:</p> <ul style="list-style-type: none"> • The removal of screenings as a data point; or • The deferral of screenings until Year 3; or • Defining the term ‘screenings’ to only include screenings which are measured as a requirement of a resource consent.
<p>How frequently are water meters calibrated? (Question 12)</p>	<p>The New Zealand Drinking Water Standards 2005 (revision 2018) and Taumata Arowai’s Drinking Water Quality Assurance Rules 2022 refers to both the verification and calibration of water meters. In addition, a majority of regional consenting authorities switch between the requirement to calibrate or verify their water meters.</p> <p>Staff wish to understand whether Taumata Arowai is seeking verification of accuracy of water meters (which may subsequently result in calibration), or each time the water meter is calibrated? The answer to this will depend on what information Taumata Arowai are seeking.</p>	<p>Confirmation of requirements to either ‘calibrate’ or ‘verify’ water meters.</p>
<p>Days for which a complete telemetry dataset has been provided. (Question 12)</p>	<p>Staff wish to understand what counts as a full day recorded, recognising that it is common to lose small pockets of data via telemetry (up to several minutes).</p> <p>Rules G13 to G15 of the Drinking Water Quality Assurance Rules allows for minor data loss when recording and reporting drinking water monitoring data. Confirmation is sought whether these standards are going to be the measure to which this data point is going to be based on?</p>	<p>That the term “complete telemetry data set” permits a small amount of data loss based on rules G13 and G15 of the Drinking Water Quality Assurance Rules.</p>

Further Information and Opportunity to Discuss our Submission

76. Should Taumata Arowai require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Kyall Foley** (Environmental Policy Analyst - City Waters) on 07 245 0040 or email kyall.foley@hcc.govt.nz in the first instance.
77. Hamilton City Council staff would welcome the opportunity to discuss the content of our submission with Taumata Arowai in more detail and to be involved in any further targeted consultation.

Yours faithfully



Lance Vervoort
CHIEF EXECUTIVE

APPENDIX 1

SUBMISSIONS MADE BY HAMILTON CITY COUNCIL IN THE THREE WATERS SPACE

FEBRUARY 2007 – SEPTEMBER 2022

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT
		COUNCIL	STAFF	
Building Performance - Issues Discussion Document - Review of the Building Consent System (July 2022)	Ministry of Business, Innovation and Employment		✓	09/09/22
Water Services Entities Bill (1)	Parliament's Finance and Expenditure Committee	✓		21/07/22
Exposure Draft of Proposed Changes to the NPS-FM and NES-F (Including Wetland Regulations)	Ministry for the Environment		✓	13/07/22
Consultation Document - Building Code Update 2022 (2 May 2022): <ul style="list-style-type: none"> • Plumbing and Drainage - Issuing and Amending Acceptable Solutions and Verification Methods. • Structural Stability of Hollow-Core Floors - Amending Verification Method B1/VM1. • Protection from Fire - Issuing and Amending Acceptable Solutions and Verification Methods. 	Ministry of Business, Innovation and Employment		✓	06/07/22
Various Proposed Technical Water Related Documents: <ul style="list-style-type: none"> • Drinking Water Standards. • Drinking Water Quality Assurance Rules. • Drinking Water Aesthetic Values. • Drinking Water Network Environmental Performance. 	Taumata Arowai		✓	28/03/22
Three Waters Reform	The Working Group on Representation, Governance and Accountability of new Water Service Entities	✓		04/02/22
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
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
Managing our Wetlands - A Discussion Document on Proposed Changes to the Wetlands Regulations	Ministry for the Environment		✓	27/10/21
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	✓		01/10/21

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT
		COUNCIL	STAFF	
Proposed Cost Recovery Fees and Charges Under Water Services Bill Regulations	Department of Internal Affairs		✓	20/08/21
Inquiry on the Parliamentary Paper on the Exposure Draft - Natural and Built Environments Bill	Parliament's Environment Committee	✓		04/08/21
Government Policy Statement on Housing and Urban Development (GPS-HUD) - June 2021 Discussion Document	Ministry of Housing and Urban Development	✓		03/08/21
Waikato District Council's Review of the Water Supply Bylaw 2014	Waikato District Council		✓	15/07/21
Waikato District Council's Proposed Stormwater Bylaw 2021	Waikato District Council		✓	15/07/21
Review of Waipa District Council's Trade Waste Bylaw (2011) and Wastewater Drainage Bylaw (2011)	Waipa District Council		✓	05/07/21
Infrastructure for a Better Future: Aotearoa New Zealand Infrastructure Strategy (May 2021 Consultation Document)	New Zealand Infrastructure Commission	✓		02/07/21
Inquiry into Supplementary Order Paper No. 38 on the Health (Fluoridation of Drinking Water) Amendment Bill	Parliament's Health Committee		✓	18/06/21
Government Three Waters Reform: Hamilton City Council Feedback to LGNZ	Local Government New Zealand	✓		10/06/21
Early Engagement on Resource Management Reform - Opportunities to Improve System Efficiency	Ministry for the Environment		✓	21/05/21
Watercare Waikato River Take Application	Environmental Protection Authority	✓		26/03/21
Water Services Bill	Parliament's Health Committee	✓		26/02/21
APP139736 - Fonterra Cooperative Group Limited - Hautapu Site - Resource Consent Applications	Waikato Regional Council		✓	31/07/20
Appeal Against Decisions of the Waikato Regional Council on Proposed Plan Change 1 to the Waikato Regional Plan	Waikato Regional Council	✓		07/07/20
Infrastructure Funding and Financing Bill	Parliament's Transport and Infrastructure Committee	✓		13/03/20
Proposed National Policy Statement for Indigenous Biodiversity	Ministry for the Environment	✓		05/03/20
Taumata Arowai - The Water Services Regulator Bill	Parliament's Health Committee	✓		28/02/20
Urban Development Bill	Parliament's Environment Committee	✓		13/02/20
Transforming the Resource Management System: Opportunities for Change: Issues and Options Paper (November 2019)	Ministry for the Environment	✓		10/02/20
Draft Growth and Economic Development Strategy - Waikato 2070	Waikato District Council	✓		24/01/20
Cambridge Wastewater Treatment Plant Discharge Consent Application - Waipa	Waikato Regional Council	✓		19/12/19

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT
		COUNCIL	STAFF	
District Council (APP141113) 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
Action for Healthy Waterways: A Discussion Document on National Direction for Our Essential Freshwater	Ministry for the Environment	✓		31/10/19
Infrastructure Funding and Financing Information Paper – Development Contributions and Targeted Rates	Department of Internal Affairs		✓	25/10/19
Discussion Document on a Proposed National Policy Statement for Highly Productive Land	Ministry for Primary Industries/Ministry for the Environment	✓		17/10/19
Discussion Document on a Proposed National Policy Statement on Urban Development	Ministry for the Environment	✓		17/10/19
Draft Report on Local Government Funding and Financing	New Zealand Productivity Commission	✓		13/09/19
Further Submissions on the Submissions to the 2018 Waikato Proposed District Plan (Stage 1)	Waikato District Council	✓		15/07/19
Waipa District Council's Proposed Stormwater Bylaw 2019	Waipa District Council		✓	21/06/19
New Zealand Infrastructure Commission/Te Waihanga Bill	Parliament's Finance and Expenditure Committee		✓	17/05/19
Local Government Funding and Financing Inquiry	New Zealand Productivity Commission	✓		15/03/19
Formation of a New Independent Infrastructure Body (October 2018 Consultation Document)	Treasury		✓	26/10/18
Three Waters Review	Minister for Local Government	✓		23/10/18
Proposed District Plan	Waikato District Council	✓		9/10/18
LGNZ Three Waters Survey	Local Government New Zealand	✓		20/09/18
Further Submissions to the Healthy Rivers Plan Change: Proposed Plan Change 1 and Variation 1	Waikato Regional Council	✓		17/09/18
Draft National Planning Standards Consultation Document	Ministry for the Environment		✓	14/08/18
Application for Resource Consents (APP137797) by Fonterra Limited for the Continued Operation of the Te Rapa Milk Processing Site, Waikato Region	Waikato Regional Council	✓		03/07/18
Waikato Regional Council's Draft 2018-2028 Long Term Plan	Waikato Regional Council	✓		20/04/18
Hamilton City Operative District Plan October 2017 Proposed Plan Change 2 - Te Awa Lakes Private Plan Change	Hamilton City Council	✓		29/11/17

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT
		COUNCIL	STAFF	
Regional Infrastructure Technical Specifications	Waikato Local Authority Shared Services		✓	02/10/17
Clean Water: 90% of Rivers and Lakes Swimmable by 2040	Ministry for the Environment	✓		05/05/17
Proposed Waikato Regional Plan Change 1 - Waikato and Waipa River Catchments	Waikato Regional Council	✓		02/03/17
The Health (Fluoridation of Drinking Water) Amendment Bill	Parliament's Health Committee	✓		09/02/17
Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments (Waikato Healthy Rivers Wai Ora Project)	Waikato Regional Council	✓		23/08/16
Local Government Act 2002 Amendment Bill (No 2)	Parliament's Local Government and Environment Committee	✓		05/08/16
Late Submission to the Ruakura Variation to Hamilton City's Proposed District Plan	Hamilton City Council	✓		06/07/16
Alteration of Designation - Resolution Drive Extension and Horsham Downs Link Road	Waikato District Council	✓		05/05/16
'Next Steps for Freshwater' Consultation Document (February 2016)	Ministry for the Environment	✓		29/04/16
Waikato Regional Council's 2016-17 Proposed Annual Plan Consultation Document	Waikato Regional Council	✓		05/04/16
Final Position Paper 'Improving New Zealand's Water and Wastewater and Stormwater Sector'	Local Government New Zealand	✓		30/10/15
Notice of Requirement: Designation by NZ Transport Agency - State Highway 26/Ruakura Road/Lisette Road Roundabout	Waikato District Council	✓		04/09/15
17 June 2015 Draft Report 'Using Land for Housing'	New Zealand Productivity Commission	✓		04/08/15
Draft Waikato District Development Strategy (May 2015)	Waikato District Council		✓	16/07/15
Water Legislation Reform Discussion Paper	Water New Zealand		✓	22/04/15
Draft Implementation Guide for the National Policy Statement for Freshwater Management 2014	Ministry for the Environment		✓	03/12/14
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
Further Amendments to the National Policy Statement for Freshwater Management 2014	Ministry for the Environment		✓	11/09/14
Draft Waikato District Council Water Supply Bylaw 2014	Waikato District Council		✓	23/05/14
Proposed Auckland Unitary Plan	Auckland Council	✓		28/02/14
Proposed Amendments to the National Policy Statement for Freshwater Management 2011: A Discussion Document	Ministry for the Environment		✓	04/02/14
Waipa District Council's Proposed Water Supply Bylaw 2013	Waipa District Council	✓		12/07/13

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT
		COUNCIL	STAFF	
Waikato-Tainui Environmental Plan (Latest Draft)	Waikato-Tainui	✓		24/06/13
Housing Accords and Special Housing Areas Bill	Social Services Select Committee	✓		30/05/13
Waikato Regional Council's Draft 2013/14 Annual Plan	Waikato Regional Council	✓		17/04/13
Freshwater Reform 2013 and Beyond	Ministry for the Environment	✓		08/04/13
Improving our Resource Management System	Ministry for the Environment	✓		02/04/13
Hamilton City's Proposed District Plan	Hamilton City Council	✓		28/03/13
Development Contributions Review Discussion Paper (February 2013)	Department of Internal Affairs	✓		22/03/13
Draft Waikato Conservation Management Strategy 2014-2024	Department of Conservation	✓		15/03/13
Environmental Management Plan for Waikato-Tainui (Working Draft Discussion Document)	Waikato-Tainui		✓	04/03/13
Consultation on Local Government Mandatory Performance Measures	Department of Internal Affairs		✓	28/02/13
Draft Waikato Regional Council Navigation Safety Bylaw 2013	Waikato Regional Council		✓	23/02/13
Plan Change 3 – Tamahere Structure Plan	Waikato District Council	✓		28/08/12
Waikato District Council's Draft 2012-22 Long Term Plan; Waikato District's Draft Waste Management and Minimisation Plan 2012	Waikato District Council	✓		09/05/12
Waikato Regional Council's Draft 2012-2022 Long Term Plan	Waikato Regional Council	✓		01/05/12
Draft Auckland Plan	Auckland Council	✓		31/10/11
Waikato Regional Council's Proposed Regional Policy Statement - Further Submission	Waikato Regional Council	✓		15/07/11
Auckland Spatial Plan Discussion Document ('Auckland Unleashed')	Auckland City Council	✓		30/05/11
Waikato Regional Council's Draft 2011/2012 Annual Plan	Waikato Regional Council	✓		26/04/11
Waipa District Council's Draft 2011/2012 Annual Plan	Waipa District Council	✓		15/04/11
Environment Waikato's Proposed Regional Policy Statement	Waikato Regional Council	✓		28/02/11
Building Competitive Cities: Reform of the Urban and Infrastructure Planning System	Ministry for the Environment	✓		17/12/10
Local Government Act (LGA) 2002 Amendment Bill	Local Government and Environment Select Committee	✓		18/06/10
Local Government Act (LGA) 2002 Amendment Bill – SOLGM's Draft submission	Society of Local Government Managers (SOLGM)	✓		11/06/10
Waipa District Council Draft 2010/11 Annual Plan	Waipa District Council	✓		19/04/10
Regional Policy Statement Review - Working Draft	Environment Waikato	✓		26/02/10
Waikato-Tainui Ruapatu Claims (Waikato River) Settlement Bill	Maori Affairs Select Committee	✓		19/02/10

DRAFT DOCUMENT/BILL	ORGANISATION	SUBMISSION		DATE SUBMISSION SENT
		COUNCIL	STAFF	
Proposed Private Plan Change No.67 - Meridian 37 Ltd	Waipa District Council	✓		29/01/10
Waipa Draft Environment Strategy	Waipa District Council	✓		24/11/09
Waste Minimisation Discussion Document	Ministry for the Environment	✓		19/05/09
Environment Waikato's Regional Policy Statement Review	Environment Waikato	✓		08/05/09
Environment Waikato's Draft 2009-19 LTCCP	Environment Waikato	✓		20/04/09
Resource Consent Application from Fonterra re Wastewater Discharge	Waikato Regional Council	✓		18/03/09
Waikato-Tainui Raupatu Claims (Waikato River) Settlement Bill	Maori Affairs Select Committee	✓		13/02/09
National Policy Statement (NPS) for Freshwater Management	National Policy Statement (NPS) for Freshwater Management	✓		23/01/09
National Environmental Standard on Ecological Flows and Water Levels	Ministry for the Environment	✓		29/08/08
Waikato District Council - Southern Districts Water Supply	Environment Waikato	✓		30/07/08
Proposed Vision for the Waikato River	Guardians Establishment Committee	✓		23/05/08
Waste Minimisation (Solids) Bill	Local Government and Environment Select Committee	✓		2/11/07

Hamilton City Council
Garden Place, Private Bag 3010, Hamilton

 /HamiltonCityCouncil

 @hamiltoncitycouncil

 07 838 6699

hamilton.govt.nz