



Public Health South

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10 June 2021

Stephen Parry
Chief Executive
Gore District Council
29 Bowler Avenue
PO Box 8
Gore 9740

Dear Stephen

RE: GORE DISTRICT COUNCIL (OTAMA RURAL WATER SUPPLY) ACT 2019 (2019 No 1) (L) – SECTION 5 CONSULTATION ON PROPOSED TRANSFER

In response to your request requiring the Medical Officer of Health to make available her views under Section 5(2)(a) and (2)(b)(i) of the Gore District Council (Otama Rural Water Supply) Act 2019 ("the Act"), the following views are expressed:

"The Medical Officer of Health views the decision to legally transfer ownership of the Otama Rural Water Supply as having some risk to public health."

"This viewpoint is based on the changing of the Drinking Water Regulator from the Ministry of Health to Taumata Arowai later in 2021. The Company is required under the Gore District Council (Otama Rural Water Supply) Act 2019 ("the Act") to provide a safe drinking water supply in accordance with any relevant regulatory requirements which I consider by definition should responsibly include the proposed Water Services legislation ("the Bill") currently at the Select Committee stage.

As the new drinking water regulatory framework under the Bill is still being developed, the Company will need to ensure that they have the capacity and resource to meet the requirements of section 8(3) of the Act with regards to the relevant regulatory requirements of the proposed legislation.

Of note, the Hokonui Runanga were consulted and did not raise any opposition to the transfer."

The Medical Officer of Health draws to your attention that, if the transfer proceeds:

- (1) The Company is a 'water supplier' as defined under the Health Act 1956 as amended by the Health (Drinking Water) Amendment Act 2007. Currently, the Company is required to comply with sections 69Z-69ZC of the Health (Drinking Water) Amendment Act 2007 and the Drinking Water Standards for New Zealand 2005 (revised 2018). The Company is required to comply with other relevant provisions of the Health Act 1956.

- (2) However, the drinking water regulator is changing from the Ministry of Health to Taumata Arowai later in 2021. There will be new legislation (Water Services Bill) and a new regulatory framework that will include increased requirements for drinking water monitoring that the Company will need to comply with.
- (3) It is recommended that the Company ensures they understand the new legislation and associated requirements once it has been implemented.
- (4) Under section 69M of the Health Act 1956 Part 2A, the Water Supplier is required to update the details which would include change of ownership.
- (5) It is recommended that a change of ownership of the drinking water supply should prompt a review of the current Water Safety Plan as good practice. If the changes present a significant public health risk, then the water supplier should conduct a formal review and re-submission of the Water Safety Plan.
- (6) Please note the accompanying information sheet "Your water supply" that should be distributed along with this viewpoint to those eligible to vote in the referendum that outlines drinking water supplier responsibilities and the hazards applicable to the Otama Rural Water Supply.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Jack'.

Dr Susan Jack

Medical Officer of Health

Designated by Director General of Health under Section 7 (A) of the Health Act 1956

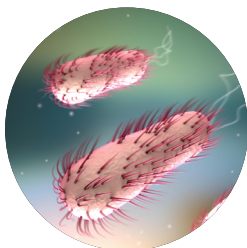
CC: Mr Tom Afleck, Chairperson Otama Rural Water Scheme Committee
Ms Karen Beirne, Manager Drinking Water, Ministry of Health

Your water supply

It only takes one thing to go wrong in a reticulated supply for a lot of people to be affected

What are the health effects of unsafe drinking water?

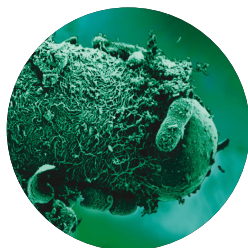
- Illness and outbreaks from organisms in the water (bacteria – E. coli, viruses or protozoa – Giardia & Cryptosporidium)



E. coli



Giardia



Cryptosporidium

- Excessive amounts of chemicals in the water can have long term health effects
- Time and cost from being ill

It only takes one thing to go wrong in a reticulated supply for a lot of people to be affected.

What does the water supplier need to do?

Protect the water source

- Stop surface run-off getting into the well
- Limit other contaminants from the catchment

Treat the water and keep it safe

- Treat the water to remove harmful organisms e.g. chlorination
- Prevent contamination by birds, possums and other animals after treatment
- Ensure water doesn't become stagnant when stored in the reservoir
- Fix broken or damaged pipes to prevent water loss
- Make sure equipment is working properly
- Have fully trained staff with backups for all contingencies

Monitor the water for

- Chlorine levels sufficient to prevent bacterial contamination
- Turbidity (murky water) and pH as they reduce chlorine's effectiveness
- Test samples throughout the water supply, interpret results and respond appropriately
- Water levels and demands

Identify and respond promptly to problems

- Investigate and fix problems
- Notify consumers and the regulatory authority of the problem, advise what action is needed and is being taken
- Resample to confirm the water is safe again

Have contingency plans for various situations including

- Actions when the water is found to be contaminated e.g. E. coli, cyanobacteria, chemicals (lead, arsenic etc.)
- Managing major leaks and pipe breakages
- Emergencies such as a flood or earthquake

Meet all regulatory requirements



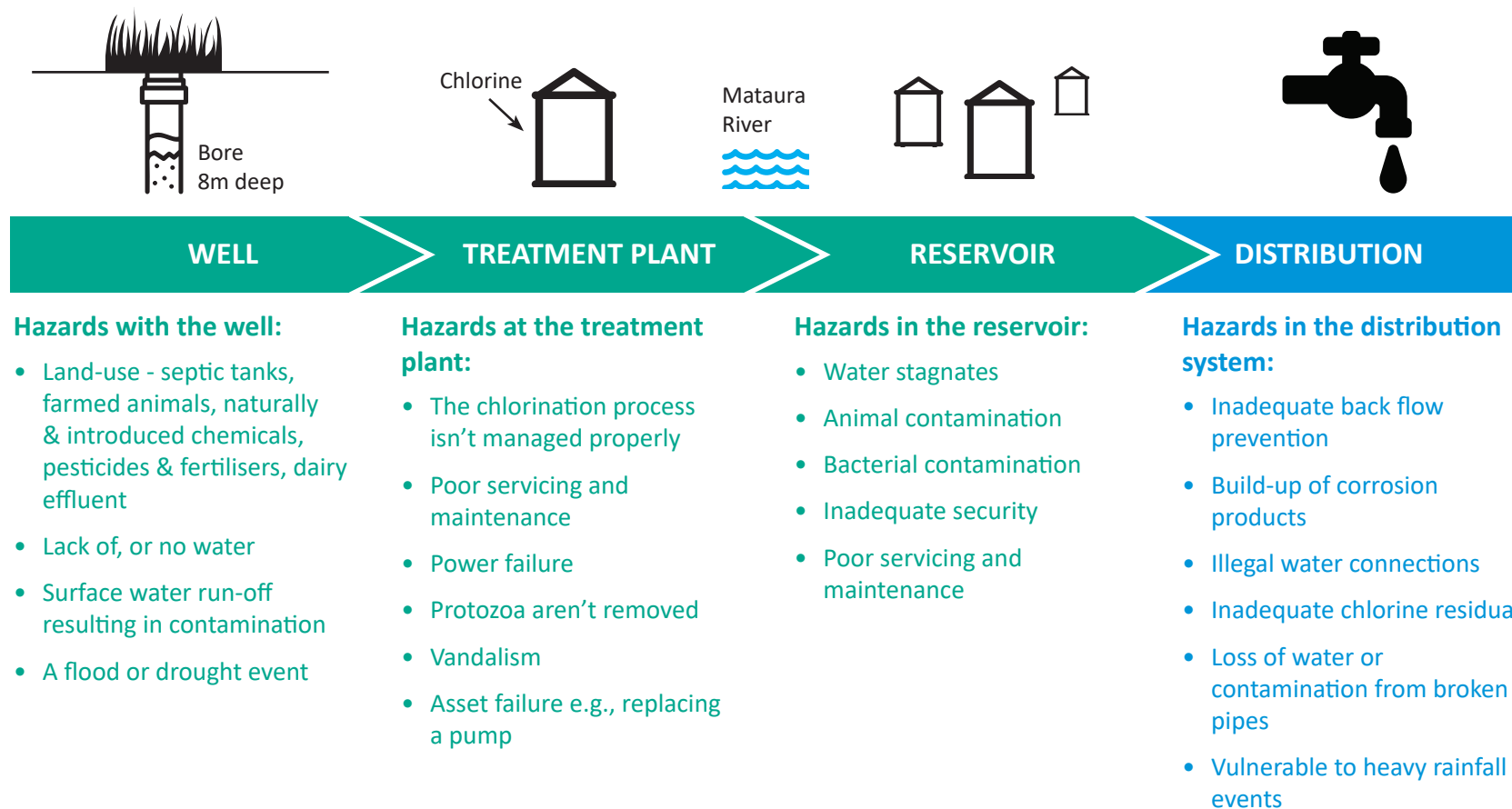
Your water supply

It only takes one thing to go wrong in a reticulated supply for a lot of people to be affected

Otama's water supply services an estimated 223 households (300 people), two primary schools and the marae.

It is sourced from an 8m deep bore, located 50m from the Mataura River. Raw water is treated with chlorine to remove harmful bacteria and then piped across the river into storage tanks. Treated water is then distributed via gravity mains, pumps and reservoirs to consumers' storage tanks.

The Otama Water Safety Plan identifies hazards with the water supply and what prevention measures the water supplier has in place or what improvement measures are needed to prevent the hazard from causing illness in the community. For example, *Cryptosporidium parvum* is a possible hazard as there is no treatment which could lead to protozoa passing into the distribution system and causing people to be unwell. An improvement is to provide treatment to remove protozoa.



Drinking Water Regulatory Changes

- The Ministry of Health transfers regulatory responsibilities to the new drinking water regulator - Taumata Arowai

Drinking water suppliers need to:

- Register with the new regulator and provide updated details annually
- Comply with the Drinking Water Standards
- Prepare and implement a Drinking Water Safety Plan
- Have a source water risk management plan
- Have a procedure for consumer complaints
- Must give effect to te Mana o te Wai

Public Health South will be:

- Involved in supporting suppliers during outbreaks associated with drinking water
- Involved in assisting suppliers with issues involving chemicals or chemical breaches