



**SUBMISSION: RURAL AGRICULTURAL DRINKING WATER SUPPLY GUIDELINE 2013 – DRAFT
FOR CONSULTATION**

Date: 30/09/13
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A handwritten signature in black ink, appearing to read "Andrew Curtis", written over a horizontal line.

(Andrew Curtis, CEO IrrigationNZ)

IrrigationNZ wishes to be heard in support of its submission, but is willing to jointly present if others make similar submissions.

OVERVIEW

1. IrrigationNZ (INZ) is a national body that promotes excellence in irrigation. INZ represents the interests of over 3,600 irrigators (irrigation schemes and individual irrigators) totaling over 350,000ha of irrigation (approximately 50% of NZ's irrigated area). It also represents the interests of the majority of irrigation service providers (over 140 researchers, suppliers, designers installers and consultants).
2. INZ has many irrigation scheme members who could potentially be impacted by the 'agricultural drinking-water supply guideline'. The primary purpose of each of these schemes, as stated in their constitutions, is irrigation water supply. However for many, recent subdivision of land has resulted in a proliferation of lifestyle blocks within their command areas. Many of these lifestyle properties are reliant on the scheme water supply as a primary or more commonly secondary source of domestic water supply.
3. All INZ members businesses are founded on secure, reliable and affordable access to a water supply for irrigation. Without this the considerable flow on benefits to regional

economies, particularly in eastern regions, would be severely impacted. The national economy would also be significantly impacted upon given that NZ is predominantly an agricultural export based economy and irrigation accounts for approximately 20% of this.

4. INZ actively engages with its members on planning issues, proactively facilitating a wider understanding of the relevant issues and solutions by all. This submission has been developed predominantly in consultation with the INZ irrigation scheme members.

SUBMISSION OVERVIEW

5. INZ generally welcomes the content of the Ministry for Health Rural Agricultural Drinking-water Supply Guideline. INZ appreciates the Ministry has attempted to strike a balance for water supply entities whose primary purpose is agricultural water supply but whom also supply a limited amount of domestic water. In summary:
 - a. The type of treatment should not be prescribed.
 - b. A volumetric approach to determining the supply use percentage is required.
 - c. Water supply entities already have water supply agreements with their shareholders / customers. A risk management plan to apportion responsibilities is not required for such scenarios.
 - d. The default responsibility should sit with the shareholder / customer.
 - e. The water supply entity should undertake three monthly water quality monitoring and inform its shareholders / customers of the results.
 - f. The development and maintenance of a shareholder / customer register should be made compulsory. This will ensure efficient and accurate dissemination of information.

Type of Water Treatment System

6. *The guideline should not prescribe the type of treatment system that may be used. Point-of-use filters should be an available option.*
7. It is important the type of water treatment system is not prescribed. Water treatment technology is ever evolving. It is therefore important the subsequent range of treatment options is not restricted. However, from the consultation document INZ understands the prescription in this case relates to a generic 'point-of-use' versus 'point-of-entry' approach.
8. A point-of entry approach to water treatment for all is an 'over-kill'. Point-of-entry approaches, either at the water supplier or the individual level, are considerably more expensive than point-of use. This is in terms of both capital and operating cost - the treatment system needs to have the capacity to treat considerably more water.
9. For example, the extra expense involved in treating water for use with amenity irrigation (garden) or for domestic uses such as flushing toilets is illogical. Grey water use for these

purposes is already actively encouraged both in NZ and internationally. Prescribing a 'point-of-entry' approach would therefore not be consistent with this.

Determining Water Supply Usage

10. *Water Supply usage should always be calculated using a volumetric approach. If water meters are not used then a 'per property' baseline should be used. This baseline should be calculated using the water supply entities water supply contract conditions or alternatively, if there is none, a baseline of 2000litres per day per property.*
11. A volumetric approach must be used as this is the only way to accurately reflect the actual water supply usage. Other options that should be excluded include a 'per shareholder' or 'customer base' approach.
12. If no form of water measurement is used, the water supply entity should next be allowed to use the terms of its water supply contract to calculate the water supply use percentage.
13. If there is no water supply agreement then INZ suggests a 'per property' approach is a more logical than a 'per person' approach. Water supply entities hold data on how many connections they have – they do not keep a census on how many people they supply!
14. INZ suggests a figure of 2000litres per property per day is typical. However undertaking a survey of water supply entities would better inform the basis for the default number.

Responsibilities

15. *INZ believes the default position for responsibility should be placed upon the individual. A public health risk Management plan is the appropriate mechanism for apportioning responsibilities where no water supply contract exists. However, if there is a water supply contract then the responsibilities will already be apportioned within this. There should be a requirement for a shareholder / customer 'register' to be developed and maintained to disseminate information.*
16. As all the water supply entities in question have a primary purpose of agricultural water supply, the default position should be the shareholder / customer is responsible for their water treatment. It is illogical to adopt any other such approach – particularly with the financial implications for the treatment of the large quantities of water being supplied.
17. The majority of water supply entities have a water supply agreement (a legal contract) with their shareholders / customers. For such scenarios it is unnecessary to require a public health risk management plan to be produced in addition as the water supply contract already does apportion responsibilities. However INZ agrees where there is no water supply agreement that a risk management plan should be produced to formalise the responsibilities.
18. INZ also suggest that an additional requirement, to develop and maintain a shareholder / customer register, is added. This will allow any issues with the water supply system to be easily disseminated (either through text or e-mail) to the shareholders / customers.

Monitoring

19. *INZ agrees that a three-monthly monitoring plan should be established by the water supply entity. The monitoring should occur at the point of entry to the water supply system. There should also be a requirement made for a shareholder / customer 'register' to be developed and maintained to disseminate this information.*
20. A three monthly water quality monitoring regime is an appropriate duration. This is qualified through balancing the cost of any greater frequency of reporting in combination with the responsibility for treatment being with the shareholder / customer. As above INZ suggests a shareholder / customer register is developed and maintained to efficiently and effectively disseminate information.
21. It is unclear from the draft guideline whether the water supply entities monitoring reporting, in addition to their shareholders / customers responsibilities, will also be required to the Ministry? INZ suggests that reporting to shareholders / customers is sufficient as Ministry reporting would create unnecessary cost with very little benefit to the water supply entity.

INZ SUBMISSION ENDS