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S05.52

**Submission to the Ministry for the Environment on the
Proposed National Environmental Standard for
Human Drinking Water Sources**

Introduction

The National Council of Women (NCWNZ) is an umbrella organisation representing 38 nationally organised societies. It has 32 branches throughout the country, attended by representatives of these societies and some 150 other societies. The Council works to serve women, the family and the community through discussion, research, study and action, disseminating information and opinion by means of its national newsletter.

This submission has been prepared using responses from members of the Council's Environment Standing Committee, who had read the discussion document. Membership opinion was gathered from responses from individuals and branches who responded to the questions on page 21 of the document, which were sent to them, along with explanatory material from the paper, by e-mail.

Executive Summary

NCWNZ members largely agree that a National Environmental Standard is necessary for human drinking water sources, compliance with which may be achieved by means of the proposed process of application for consent to carry out permitted activities within the catchment area. Having a standard will ensure consistent water quality throughout the country, which is an expectation of most New Zealanders anyway. A bonus benefit of ensuring that source water is reasonably clean could be that the health of livestock feeding within the catchment area would improve, since animals also do better where the water they drink is unpolluted.

Members are anxious that with increasing pressure on catchment areas because of intensified human activities, there is increasing risk of water being polluted by an ever wider variety of biological and chemical material, and the treatment processes presently relied upon to deliver water of an acceptable drinking quality may not be adequate to cope with water that is heavily contaminated or polluted. Members also agree that a multi-barrier approach to ensuring that contamination does not happen is a good one – better to have systems that prevent accidents from happening at all than have ambulances to deal with the damage caused by accidents.

There was only one disagreement with the need for a standard. One respondent pointed out that there is already scope within the provisions of the Resource Management Act and the Local Government Act for the Ministry of Health, water supplying authorities and the public to have input into district plans, and amongst them they could determine what would be the best way to ensure that each community's drinking water is wholesome and potable.

Because of the decision not to prescribe a bottom-line standard, a guideline approach would be more appropriate than a NES. To date no definitive cost/benefit analysis has been carried out, and it may transpire that once a standard has been drafted and then implemented, the costs of complying with it far outweigh the actual benefits derived from its application.





General Remarks

NCWNZ has previously made submissions when proposals to do with water management have come up, particularly from our interest in the relationship between clean water and public health. In 1998, in Submission 98.23, NCWNZ said, “Water quality must be maintained as an essential part of a healthy environment,” and earlier this year Submission 05.18 in response to the discussion paper “Freshwater for a Sustainable Future” supported the need for processes that protect fresh water supplies.

Amongst responses to the current paper, one branch raised a concern that introducing this NES could prepare the way for privatising drinking water supplies, an undesirable outcome since those on lower incomes would suffer. Privatisation is to be avoided. It is also possible that a decision not to upgrade treatment facilities could mean that consents for some activities that would adversely affect a catchment area would not be granted, which in the long run might hold back the development of that region in which the treatment plant is situated.

Another respondent would have liked an expansion of some of the acronyms used in Appendix 2, eg TPH and BOD.

The proposal for the standard appears to apply only to proposed new activities within a catchment area. NCWNZ questions whether any existing activities need to be assessed for their possible impact on the quality of source water, and whether any retrospective action needs to be taken.

Section 4.1.3 discusses risk based assessment. One respondent felt that the statement “requires consent authorities to periodically assess whether existing or proposed permitted activity rules in plans present a risk to community drinking water supplies” is too loose. Periodically could mean anything from annually to every ten or so years.

Several respondents expressed concern that the standard will be written as a narrative, with no measurable bottom line requirement. They would feel more reassured that compliance was certain if a measurable criterion was to be met.

The Questions

1. 1 (a) and (b).

Most respondents were in favour of notifying water suppliers of resource consent applications relating to water catchment areas, and believe that the ideal would be to have *all* applications notified, but recognise that this would probably result in cumbersome, time-consuming and costly machinery. The consensus is for option 1(b).

2. Contaminants and pathways.

All respondents agree that the information contained in Appendix 2 would be of use to councils when establishing criteria for determining which activities might adversely affect water quality. It is a comprehensive list, but one respondent suggested an addition to Section 4.3 Hospital: - discarded medications such as narcotics and antibiotics. Another respondent dryly remarked that it would be hard to find a human activity that *doesn't* in some way potentially adversely affect drinking water.

There was a suggestion that it might be helpful to include in Appendix 2 a section that detailed opportunities to mitigate contaminate pathways, so that where, for instance, pesticides are frequently used, mitigation measures such as recommendations for frequency of application, amount to be used and concentration, and riparian planting that were already in place could prevent contamination from happening at all.



3. Adequacy of standard to ensure that suppliers are notified.

The language used in Section 4 actually is neither strong nor precise enough to ensure that water suppliers are notified of resource consent applications that might affect the level of treatment needed to produce wholesome and potable water. It is specified that a consent authority shall not grant resource consent for an activity that renders source water at the point of abstraction for a community drinking water supply undrinkable following treatment. Further, a water supplier must be informed of any unauthorised or accidental discharge of a contaminant from an activity for which consent has been granted, and that communication amongst the consent authority, the applicant and the water supplier will be necessary. However, nowhere is it specifically said that the consent-granting authority *must* confer with the water supplier before a consent is granted – or not. It is an absolutely necessary condition of the process that authority and supplier communicate, and should be specified in the detail of the standard's narrative.

4. Definition of treatment.

Without having a bottom line for source water quality it is indeed difficult to define treatment. According to the definition supplied in Appendix 1, treatment should deliver drinking water that is potable and wholesome, but by what means is not mentioned. More detail is required as the definition does not outline the full range of options that are now available for treating water. Current technology allows such methods as ultra-violet disinfection, and it is quite likely that further technological development will allow cheaper and even more effective treatment methods. However, the language of the proposed standard does allow for a non-treatment option where existing water supplies are so pure that treatment is unnecessary, and it makes sense not to require that such a water supply be treated.

One branch recommended that the method of treatment of the water supplied to any community be published locally, at regular intervals, so that the community remains informed and thus able to question the quality of their water if necessary.

Another respondent remarked that in allowing some communities a non-treatment option, there should still be some means of ensuring that the quality of the water supplied does not drop over time. The notification and monitoring process is long and costly, and it could become an easy option to just let things through to save time and money, which is quite unacceptable as it could result in a lower than desirable quality of water.

5. Threshold for application of standard.

Most respondents felt that the suggested criteria for applying the standard are rather low. We realise that such small communities are likely to be holiday resorts, youth summer camps, marae and similar sites, and they no less than any other community should be assured of a wholesome water supply, but bringing a treatment facility up to the required standard might be unaffordable. Financial help might be necessary for such small enterprises, but NCWNZ members feel that the threshold could be raised, although there were no suggestions for the actual numbers.

Conclusion

NCWNZ members feel that the proposed National Environmental Standard for drinking water sources should be adopted, in the interest of ensuring that nationally the quality of drinking water is high. NCWNZ is happy that drinking water catchment management is addressed through the RMA rather than through health legislation, even though the intention is to ensure good public health.

NCWNZ is very pleased to have had the opportunity to respond to the discussion paper, and we look forward with interest to the Ministry's response to submissions made.

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