

13 September 2024

Operations and Maintenance Engineer
Marlborough District Council
P O Box 443
BLENHEIM

Attention:
Stephen Rooney

Review of Marlborough District Councils water supply performance against the Water Services (Drinking Water Standards for New Zealand) Regulations 2022 and the Drinking Water Quality Assurance Rules 2022 [DWQAR], for the period 1 July 2023 – 30 June 2024

I refer to the independent assessment of performance of water supplies against the Water Services (Drinking Water Standards for New Zealand) Regulations 2022 and the Drinking Water Quality Assurance Rules 2022 [DWQAR], for the period 1 July 2023 – 30 June 2024. The assessments were undertaken by Matt Molloy, an independent drinking water compliance specialist.

The assessments under the DWQAR followed a similar procedure that was used for the previous drinking water standards, using a methodology and an assessment checklist based on the Drinking Water Assessor process and developed by Matt Molloy Consulting (MMC). The monitoring rules to show treatment plant bacterial and protozoal compliance were reviewed along with the bacterial and residual chlorine compliance in the distribution zone. This covers the previous DWSNZ sections: Bacterial compliance (Section 4) and Protozoal compliance (Section 5).

This would also meet the Department of Internal Affairs/Audit NZ measures of no *E.coli* or protozoa. Only the monitoring rules and those assurance rules required to demonstrate immediate compliance were reviewed, Assurance rules only need to be reported on annually so are currently outside the scope of the assessment. The current audit cycle does not line up with the annual reporting required by Taumata Arowai. The DWQAR does state 'Assurance rules are not used to demonstrate compliance with the Drinking Water Standards but indicate whether supplies undertake activities that contribute to the provision of safe drinking water'. However, it is appropriate to report on these if the supplier has provided the information as they do affect compliance.

In regard to the Water Services (Drinking Water Standards for New Zealand) Regulations 2022, Table 1, the maximum acceptable value (MAV) for *E.coli* and protozoa were not found to be exceeded. Only *E.coli* sampling was undertaken, protozoa compliance is based on meeting the requirements of the DWQAR.

The assessment covered all MDCs treatment plants and distribution zones. A brief report describing the process and results for the DWQAR assessment is attached to this letter.

Each treatment plant and distribution zone result is summarised in the table below. The DWQAR assessment has reported on the compliance monitoring periods and each one being met. This is either the number of days out of 366 days or number of months out of 12 months. This acknowledges the actual compliance. Supplies were only assessed when operating.

Drinking Water Quality Assurance Rules 2022

For the period 1 July 2023 – 30 June 2024

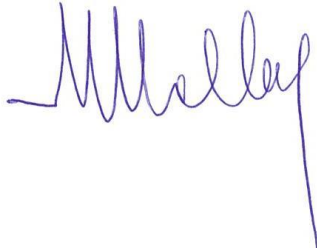
Water supply	Treatment plant		Distribution zone	
	Bacterial	Protozoa	Microbiological	Residual disinfectant
Blenheim -MRR	123/123	123/123	12/12	0/12
Blenheim -Central	366/366	366/366		
Picton -Speeds Rd	366/366	366/366	12/12	12/12
Picton -Essons	86/88 ¹	86/88 ¹		
Renwick	0/366 ²	0/366	12/12	12/12
Awatere South	1/12	0/12	12/12	9/12
Dashwood	1/12	0/12	12/12	12/12
Seddon	366/366	364/366	12/12	12/12
Havelock	0/366 ²	0/366	12/12	12/12
Riverlands -Malthouse	0/366	0/366	12/12	0/12
Riverlands Hardings	0/366	0/366		
Wairau Valley	290/311	290/311	12/12	12/12

NOTE:

- Treatment plants using T3 rules have a compliance monitoring period of 1 day and have been assessed over 366 days, so the result is recorded as how many days out of 366 days the supply was compliant. Blenheim-MRR and Picton-Essons only operated for part of the time so were assessed when operating.
 - Treatment plants using T2 rules have a compliance monitoring period of one month and have been assessed over 12 months, so the result is recorded as how many months out of 12 months the supply was compliant.
 - Distribution zones using D3 and D2 have a compliance monitoring period of one month and have been assessed over 12 months, so the result is recorded as how many months out of 12 months the supply was compliant.
 - It is possible that with the submission of an annual report in January 2025 individual compliance or the overall result may change.
1. Of the 2 non-compliant days at Essons plant, both were for approximately 1 minute and very unlikely to have represented a risk to the public, this is considered a technical issue.
 2. Both Havelock and Renwick supplies are chlorinated, however they do not have a pH meter for the Free Available Chlorine equivalent (FACe) calculation. Chlorine was present at all times but the FACe could not be demonstrated, this is considered a technical non-compliance.

If you have any questions or queries, please contact the undersigned.

Kind regards

A handwritten signature in blue ink, appearing to read 'M Molloy', with a long vertical line extending downwards from the end of the signature.

Matt Molloy
Drinking Water Compliance Specialist
Matt Molloy Consulting Ltd

Copy confirmationsouthern@auditnz.parliament.nz