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Building Policy
Building, Resources and Markets
Ministry of Building Innovation and Employment

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Occupational Regulatory Regime for Engineers

Water New Zealand (Water NZ) is a national not-for-profit organisation which promotes the sustainable management and development of New Zealand's three waters (drinking water, wastewater and stormwater). Water NZ is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Its 2,450 members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants (including engineers), suppliers, government agencies, academia, and scientists.

Thank you for the opportunity to provide feedback on the Ministry of Business Innovation & Employment's (MBIE) consultation paper – *A proposed occupational regulatory regime for engineers*, and to providing an extension.

Water NZ agrees that "[o]ccupational regulation of a profession aims to protect the public from the risks of an occupation being carried out incompetently or recklessly.

Water NZ understands the proposal is to create a two-tiered scheme, whereby all engineers will be required to be registered and certain engineers involved in high risk engineering disciplines will be required to be licensed.

One of the (potential) implications of the consultation paper is that engineers involved in water may be included within the set of engineers that are required to be licensed.

Indeed, the consultation paper refers to the Government's Inquiry into the Havelock North Drinking water (2017) where over 5000 people became ill due to contamination of Havelock

North's drinking water. The inquiry found, among other things, poor monitoring and inspection by engineers.

Water NZ supports appropriate levels of competency being stipulated for people working in the field of water. Clean safe water, and improvements in the environmental performance of Aotearoa New Zealand's wastewater and stormwater networks are critical to public health. Water NZ's kaupapa is "ka ora Te wai, ka ora Te whenua, ka ora ngā tāngata", "If the water is healthy, the land is healthy, and the people are healthy".

Water NZ is taking steps to specify appropriate levels of competency within the water sector. To date competency frameworks have been developed for:

- Drinking water treatment operator;
- Wastewater treatment operator;
- Drinking water distribution operator;
- Wastewater network operator.

See the link [here](#).

Further competency framework's are in the process of being drafted – Small rural water supplies – and others have been identified – lab technician, field technician, trade waste officer, stormwater network operator. Water NZ would appreciate the opportunity to discuss the competency framework's being developed with the Building Policy team at MBIE.

The consultation paper comments that the regulation of engineers is at odds with comparable professions with New Zealand. Specifically, building practitioners, electrical workers and plumbers, gasfitters and drain layers must be registered to practise certain work. In each of these professions there are entry restrictions (qualification or examination) and can be subject to disciplinary action.

There is a similar anomaly for operators within the water sector.

The attached diagram provides a simplified water cycle. Highlighting that plumbers, gasfitters and drainlayers who operate within a house boundary are required to be registered. Under this proposal engineers will be required to be registered and potentially

licensed. Operators who operate and maintain intakes, pipes, pumps, treatment plants, reservoirs are not.

Water NZ and the Water Industry Operations Group (WIOG, an industry association) have created the Water Industry Professionals Association (WIPA) to voluntarily address this anomaly. See www.WIPA.co.Nz

WIPA provides a continuing professional development and registration scheme for water industry professionals. Water industry professionals, employed in the water/wastewater industry may apply to enrol in the WIPA programme.

- The programme provides access to WIPA approved courses. Each course, once completed, gains a set number of WIPA CPD credits, which contribute to achieving the requirements needed to become a Registered Water Industry Professional.
- Enrolment into the WIPA programme is by way of the Management Committee assessing and approving completed applications. Applicants are notified of the Management Committee's decision and approved applications are enrolled into the WIPA programme.

There are two pathways to become registered:

1. If you have more than 4 years of relevant water industry experience, you can apply to become a Registered Water Industry Professional when you have achieved all of the following:
 - A recognised water/wastewater qualification (e.g. NZ Certificate or Diploma in water/wastewater, or equivalent) – Please note that certified copies of qualifications need to accompany your enrolment.
 - 4 or more year's experience in the water/wastewater industry
 - Endorsement from the enrollee's employer
 - Endorsement from a senior water professional outside of the enrollee's employer
2. If you have less than 4 years of relevant water industry experience, you can apply to become a Registered Water Industry Professional when you have achieved all of the following:
 - 30 WIPA CPD credits achieved within a 2-year period

- A recognised water/wastewater qualification (e.g. NZ Certificate or Diploma in water/wastewater, or equivalent) – Please note that certified copies of qualifications need to accompany your enrolment.
- 2 year's experience in the water/wastewater industry
- Endorsement from the enrolee's employer
- Endorsement from a senior water professional outside of the enrolee's employer

Three levels of registration have been created:

- Level one registration is granted to people who have achieved a NZQA level 3 reticulation qualification or similar.
- Level two registration is granted to people who have achieved a NZQA level 4 (certificate) qualification or similar.
- Level three registration is granted to people who have achieved a NZQA level 5 (diploma) qualification or similar.

WIPA is at the beginning of its journey to lifting both the recognition of trained, experienced and committed individuals to continuing professional development and the general level of competence across operators in the New Zealand water sector.


Water NZ and WIOG would appreciate the opportunity to discuss WIPA with the Building Policy team at MBIE.

The Water Services Bill, currently before the Health Committee, provides the regulatory framework for Taumata Arowai – the water services regulator. Under the Water Services Bill certain persons will be required to be “authorised”.

The competency frameworks being developed by Water NZ should provide a solid and useful basis for a discussion as to what level of competence is appropriate for the designation of “authorised”. The competency framework has been developed by industry – see the review panel listed [here](#). Similarly, WIPA should provide a useful basis for registering persons who have met the “authorisation” standard.

Water NZ appreciates the opportunity to make this submission. The regulation of engineers generally, and all those involved in the water sector, is critically important to the public.

Ngā mihi nui

A handwritten signature in black ink, appearing to read 'Gillian Blythe'.

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cc.

Nick Hewer-Hewitt, Chair WIOG and WIPA

Ray MacMillan, Taumata Arowai