

10th May 2024

The Secretary for Local Government
Local Government Branch
Department of Internal Affairs
Wellington
Via email councils@dia.govt.nz

Tēnā koutou

Consultation on Rules Setting Local Government Performance Measures

Water New Zealand is writing in response to proposed amendments to the rule specifying performance measures for the activity group of water supply in the Non-Financial Performance Measure Rules 2013 (the Rules).

Water New Zealand 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 New Zealand is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Its ~3,300 members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants, suppliers, government agencies, academia and scientists.

Our membership includes water managers from territorial councils and council-controlled water suppliers with responsibility for reporting under the rules. Our submission addresses concerns raised by our membership that the proposed measures are not consistent with the current approach to drinking water supplies. We also take the opportunity to comment on issues with other water related performance measures, outlined in the non-financial performance measure rules and duplication with Taumata Arowai reporting requirements.

Proposed measure for protozoa is not consistent with current practices for achieving drinking water quality compliance.

Pathogenic protozoa is not required to be regularly tested by water suppliers in New Zealand. Rather, the Drinking Water Quality Assurance Rules 2022 outline treatment rules and requirements that drinking water suppliers must meet to provide adequate protection against protozoa. Requiring reporting against achievement of the drinking water quality assurance rules would more accurately capture the level of protection against protozoa.

RECOMMENDATION: Performance measure 1 should refer to relevant sections of the Drinking Water Quality Assurance Rules 2022

Aligning measures with Taumata Arowai reporting requirements.

Water supply non-financial performance measures are duplicated in Taumata Arowai's reporting requirements. Performance measure 1 – the safety of drinking water, directly relates to Taumata Arowai's core regulatory function of ensuring access to safe and reliable drinking water. Other performance measures which duplicate Taumata Arowai's Network Environmental Performance Measure Rules are listed in the accompanying table.

Taumata Arowai has also signalled its intention to publicise wastewater performance measures for reporting in the 2023/24 calendar year. These will overlap with Non-financial performance measure rules, Sub-part 2 – Sewerage and the treatment and disposal of sewage, performance measures.

Department of Internal Affairs Non-financial Performance Measure Rules		Taumata Arowai's Network Environmental Performance Measure Rules
DIA Reference	DIA Measure	
2	Maintenance of the reticulation network Percentage of real water loss including methodology	Estimated total drinking water network water loss (m3/year) [RE1]
		Current annual real loss (CARL) (litres/service connection/day or m3/km of mains/day) [RE2]
		Infrastructure Leakage Index (CARL/UARL) [RE3]
3	Fault response times	
a	Attendance for urgent call outs	Median hours to attend an urgent fault [R1]
b	Resolution for urgent call outs	Median hours to resolve an urgent fault [R3]
c	Attendance for nonurgent call outs	Median hours to attend a non-urgent fault [R2]
d	Resolution of nonurgent call outs	Median hours to resolve a non-urgent fault [R4]

There are differences in definitions between the DIA and Taumata Arowai performance measures. This creates an unnecessary reporting burden for water suppliers, and confusion for stakeholders seeking to interpret reported information.

There are a range of issues faced by Water Service Managers when reporting on the Non-financial performance measures that prevent them from being a comparable and accurate representation of performance. Issues and proposed resolutions raised by Water Service Managers in 2018, that remain unaddressed are provided as an attachment to this submission.

The Taumata Arowai rules have been recently consulted with industry. They build on measures contained in the Water New Zealand National Performance Review, a voluntary benchmarking process that council and council-controlled organisations supplying water services participated in from 2008/09 to 2021/22. Performance measure definitions were iteratively refined over time. The Taumata Arowai network environmental performance measure rules therefore provide a more useful set of definitions.

RECOMMENDATION: Align definitions of Department of Internal Affairs Non-financial Performance Measure Rules with those contained in Taumata Arowai's Network Environmental Performance Measure Rules

Making good use of information on reported performance

While two parallel reporting initiatives for water services would appear to be inefficient, Water New Zealand note that both serve different, and valuable functions:

Non-financial performance measure rules are an important component of council Long Term Planning and Annual Reporting processes. Having performance measures for Water supply, Sewerage and the treatment and disposal of sewage and stormwater drainage performance included in these processes is valuable. The performance measures are independently audited,

and can be used to fulfil quality assurance requirements of food producers and other industries who are required to demonstrate the safety of water supplies used in their processes.

Network environmental performance measure rules these are a broad suite of measures, centrally collated by Taumata Arowai. Associated reporting allows the identification of individual trends and in time (we hope) comparative performance information to be made available in the public arena.

We note that currently neither initiative provide sufficiently accessible public reporting to provide consumers with ready access to performance information on water services. Providing transparent, and comparable reporting of these performance measures is needed to realise the significant effort made by water suppliers compile and report information.

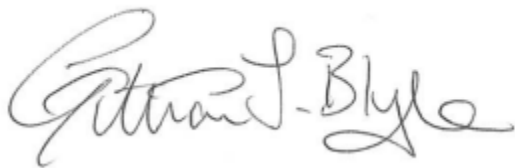
RECOMMENDATION: Taumata Arowai and Department of Internal Affairs collaborate to improve alignment and uplift the value of existing performance measure reporting

Providing the public with information on reported performance

We note that currently neither initiative provide public reporting to provide clear visibility or supports comparison of water supplier performance. Providing transparent, and comparable reporting of these performance measures is needed to realise their value and justify the significant effort water suppliers make to compile and report information.

We welcome further collaboration to address issues raised in this submission. If you have any queries in relation to this, please contact lesley.smith@waternz.org.nz.

Ngā mihi,



Gillian Blythe