

## Safe Drinking Water Regulations 2004 - Submission

Some ideas for response to regs:  
(the numbers referred to below are those used in the draft regs.)

### **4. Water Sampling Localities**

Concern is expressed that the localities ('zones') are not defined clearly enough and hence water suppliers may not sample all parts of a water supply since the definition is too loose and hence too much open to individual interpretation.

Water Authorities should carry out sampling in 'zones' that clearly help them to determine the quality of the water supplied to all their consumers not just the bulk of their consumers. People in small high level areas are just as important as anyone else.

### **5. Water Sampling Points**

- (1) The regulations do not specify that samples should be taken at customer taps. The way the regulations are worded, samples could be taken at water entry points or at tanks.

This section must be worded so there is no doubt that the term 'water sampling point' refers to sampling at customer taps.

- (2) (a) It is not clear what is meant by this section. Legislation should be free of this type of double talk. Put a table of number of taps required per population if this is so important.
- (2) (b) Why must the number of taps not exceed 100? (Should a water sampling locality already have say 100 sampling points, and over time, some of these are deemed unsuitable, then new codes will be required for replacement sites. Old codes cannot be recycled as this would prevent historical data collection)

What about the metropolitan area where zones already have more than 100 customer taps in them?

### **11. Frequency of sampling for drinking water**

- (1) The inference from this paragraph is that the Water Authority must collect a sample and analyse for each of the parameters in Schedule 2 Table. It makes no reference to the chlorine or ozone or aluminium based chemical by products as needing to be monitored only if the Authority is using them.
- (2) This paragraph as it stands says that you only need two sampling points per zone, you just can't use the same site as you used last time. (this is rather ironic since DHS used to specify the same site two months in a row quite often) Reference to random sample point selection is missing.

### **13. Accreditation of water analysts**

According to 13 (2) (b) there must be a written declaration that the analyst is not in a conflict of interest situation but section 13 (8) says that this is okay providing you work for or on behalf of a government agency involved in water supply

### **Schedule 2**

The table should make clear reference to the fact that it refers to sampling at customer taps.

Request is made to change the wording of headings, e.g.

'Chlorine based chemicals' should read '**Additional testing required for supplies disinfected with chlorine based chemicals**' etc

The schedule needs a table detailing the **number of samples** required to be taken for each parameter **based on population** supplied by a water sampling locality.

Water authorities **need and want** guidance on sample numbers to be taken in order that they can confidently assure their customers of the quality of water supplied in all population sized areas.

**Additional point for DHS to consider:**

In the Water Authorities annual report on water quality, they should report on the percentage of samples from entry points that have zero coliforms as this is a measure of the effectiveness of their disinfection systems.