

20 February 2020

Upper Hutt City Council
Private Bag 907
Upper Hutt 5140

Tēnā koe

Water Supply Bylaw 2008: Proposed Amendments 2020

Thank you for the opportunity to comment on the Water Supply bylaw review. This submission is on behalf of Regional Public Health (RPH). One of our key public health functions is to improve, promote and protect the health of people and their communities.

RPH serves the greater Wellington region through its three District Health Boards (DHBs) Wairarapa, Hutt Valley and Capital & Coast. We work with our communities to make it a healthier safer place to live. We promote good health, prevent disease and improve the quality of life for our population, with a particular focus on children and Māori and work with primary care organisations. Our staff includes a range of occupations such as Medical Officers of Health, public health advisors, health protection officers, public health nurses and public health analysts.

We are able to provide further advice or clarification on any of the points raised in our written submission. We do not wish to make an oral submission.

The contact point for this submission is:

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Ngā mihi

Dr Stephen Palmer
Medical Officer of Health

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Specific Comments

Regional Public Health (RPH) believes it is important the final wording of any bylaw ensures it is futureproofed in regard to probable changes to drinking water legislation proposed under the Taumata Arowai - Water Services Regulator Bill, in particular, the proposed function of Taumata Arowai to provide oversight in relation to drinking water safety and regulation including the management of risks to sources of drinking water.

RPH further believes to this end the proposed bylaw should be assessed against the provisions of the Taumata Arowai – the Water Services Regulator Bill along with Part 2A of the Health Act 1956 and Wellington Water’s Water Safety Plan for Upper Hutt to ensure that the provisions of the proposed bylaw reflect the current and future operational and regulatory environment.

16.1 Backflow prevention

Backflow is one of the biggest risks to a water supply and is a potential source of contamination. RPH believes clause 16 should reflect the requirements of Section 69 ZZZ of the Health Act 1956, particularly in relation of the requirement to test each back flow protection device annually. The bylaw should specifically outline the obligations of parties in this regard. RPH believes where backflow prevention appliances are being fitted and tested, that it shall be done by an independently qualified person.

Section 10.7

RPH notes this clause states the Water Supply Authority is under no obligation to provide an extraordinary supply. Whilst we understand the rationale for this clause, we note the definition of extraordinary supply includes premises which have a vital public health function, such as medical centres and hospitals.

Section 2.2 and Section 27.1

RPH believes these clauses would be strengthened by the inclusion of reservoirs as a portion of the water supply infrastructure which should be protected from interference or tampering.