

Health Select Committee's Water Services Bill

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Health Select Committee's Water Services Bill.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH, particularly in relation to Drinking Water Assessment.

General Comments

4. NMH supports water reforms that, amongst other things,
 - a. significantly strengthen compliance, monitoring and enforcement relating to drinking water regulation.
 - b. will manage the risks to drinking water safety and ensure that source waters are protected.
 - c. ensure that more people can access water that is safe to drink and to provide safe drinking water on a consistent basis.

The new legislation along with the rules and recommendations take a pragmatic approach however there is a concern that these may pose significant affordability and practicality challenges for the smaller suppliers that are to be brought into the regulatory regime.

NMH would like the Water Services Bill (the Bill) to formally recognise that public health entities and local authorities have a statutory responsibility to promote and protect the health of people and as such Taumata Arowai has a duty to liaise and report to DHBs any concerns related to drinking water in relation to local communities, and that there is a statutory provision that the regulator has a duty to supply Ministry designated Medical Officers of Health/Health Protection any data they might request.

In addition and as alluded to in comments pertaining to clauses 102 and 104 above, there does not appear to be a clear requirement for Taumata Arowai to incorporate public health expertise, even though protecting public health is the primary aim of the regulator and associated

legislation. The current regulatory regime includes expertise and oversight from Medical Officers of Health, Health Protection Officers and Drinking Water Assessors (who necessarily hold public health-related qualifications and expertise).

Recommendation: That Taumata Arowai has a statutory responsibility to inform Ministry designated statutory public health officers (Medical Officers of Health and Health Protection Officers) of breaches of any standards or any public health concerns, that they have a statutory responsibility to consult with statutory public health officers regarding any changes in standards/procedures, and that statutory public health officers have statutory powers to request any data/information from Taumata Arowai that they judge necessary to help them protect and promote public health in the communities they service..

Recommendation: that there is public health expertise within Taumata Arowai

5. The Water Services Bill aims to regulate all water supplies that provide water to two or more dwellings. NMH supports this approach but acknowledges that this potentially will create an extremely high volume and complexity of work for Taumata Arowai, territorial authorities and others both in the initial supply identification phase and then in the ongoing regulatory, phases. In addition the Building Act and related regulations could be better utilised in regards to those with very small supplies e.g. define 'potatable'. The regulator needs to be cognisant of the practicalities of this breadth of regulation and of the public health benefits thus derived. Rules and regulations imposed, particularly on the smallest suppliers, must be commensurate with the risk and proportionate, as is described in the Explanatory notes to the Bill.

Specific Comments

6. **Purpose of the Act (Clause 3):** NMH supports the Purpose. NMH notes that the term "consistent" is used, however this term is not defined within the Act and therefore is open to interpretation. The aim of the legislation is for absolute compliance.
7. NMH notes that the purpose of the Bill does not include the sustainability of supply. Currently water for drinking is not separated from water for

washing or household functions. Given the prevalence of drought around the Nelson/Tasman region and elsewhere in New Zealand, having a “safe” supply is also closely connected with having a sustainable supply and with good water management practices. This is not really alluded to in the purpose.

8. In general, there concerns about the ways that source water is being affected by land use management practices and a heavy reliance on the subsequent “clean-up”. NMH advocates for stronger language in this provision.

Recommendation: that the following wording is added “*providing a source water risk management framework that, together with the Resource Management Act 1991, regulations made under that Act, and the National Policy Statement for Freshwater Management, enables risks to source water to be properly identified, managed, and minimised*”

Recommendation: that the term “consistent” is defined within the Interpretation section.

9. **Interpretation section (Clause 5):** NMH has the following comments to make in relation to this Clause.

- a. *Abstraction Point:* It is noted that roof supply has not been included in the examples listed. It would be beneficial that this is included so that rainwater is also accounted for.

Recommendation: the example is reworded to “the location at which water is abstracted from a river, stream, lake, aquifer, or rooves)

- b. *Officer:* NMH notes that the definition of officer does not cover “incorporated societies”. There are a number of community water suppliers who are incorporated societies. It is not clear here if the description body corporate covers them therefore further clarity is required.
- c. *Self-supplied building:* NMH notes that although this term is not defined in the Bill, it appears in the *Draft Drinking Water Supply Operational Compliance Rules*, Dec 2020 from Taumata Arowai. It creates confusion across the Bill and the Rules by adding another category that is excluded from backflow prevention, hygiene

practices for maintenance and upgrades, monitoring disinfection by-products and microbial water quality- see chapter 1.4, Distribution systems of the Compliance Rules.

Recommendation: that the term “self-supplied building” is defined within the Interpretation section.

- d. *Source, source water, and source of a drinking water supply:* The definition is restricted to freshwater, however there may be occasions in the future (or such as happened in the aftermath of the Christchurch earthquake) where seawater is required to be desalinated. Therefore the definition of source water should not necessarily be confined to *freshwater body*.

Recommendation: that the definition is not restricted to freshwater.

- e. *Urban area:* NMH notes that this term is only used within the Interpretation section, and not mentioned elsewhere in the Bill. It's inclusion seems superfluous *Recommendation:* that the definition for urban area is removed

10. ***Meaning of safe in relation to drinking water (Clause 7)*** states that “safe” means “drinking water that is unlikely to cause a serious risk of death, injury, or illness”.

11. It seems a contradiction that water can be determined to be safe unless there is a serious risk. Water cannot be called safe if there is even a *moderate* risk. Neither the New Zealand Drinking-water Safety Plan Framework, nor the Handbook for Preparing a Water Safety Plan, use the term serious risk.

12. NMH notes that the term Risk is also not included in the Bill

Recommendation: that the term “serious” is removed from the definition.

Recommendation: that the term “risk” is quantified

Recommendation: this change should also occur in **Clause 58 (2)(b)** *Taumata Arowai may declare drinking water emergency* and **Clause 104 Compliance Officer Powers**.

13. *Meaning of point of supply (Clause 13)*: In this Bill, the point of supply, in relation to a drinking water supply, means, “(c) *if the supply includes an end-point treatment device, the end-point treatment device.*”

This definition is suitable if the supplier installs and has control over the treatment device under *Clause 28 Duty to ensure end-point treatment*. If, however, the water supplier does not require an end-point treatment device, the home owner/occupier may choose to install their own. If an illness results from lack of maintenance or testing of this device, it seems the supplier may be accountable from something not under their control. In order to mitigate this, an additional reference to Clause 28 would be beneficial.

Recommendation: Clause 13(c) is reworded to “*if the supply includes an end-point treatment device, the end-point treatment device in accordance with Clause 28(2)(b)*”

14. *Act binds the Crown (Clause 19)*: NMH notes that the term “Instrument of the Crown” is not defined in the Bill

Recommendation: that the term “Instrument of the Crown” is defined within the Interpretation section.

15. *Duty to supply safe drinking water (Clause 21)*: “All practicable steps” and its variants throughout the Bill e.g. reasonable practicable steps, are not defined in the Bill

Recommendation: that the term “All practicable steps” and related variants are defined within the Interpretation section.

16. *Duty to provide sufficient quantity of drinking water (Clause 25)*: Without a prescribed figure, or formula to calculate sufficient quantity, Section 7(b) seems to be negated i.e. the consumer still has to receive water. Potentially there could be a risk that a supplier reduces the amount of water supplied, to only meet the minimum required, and still meets their legal obligation.

Recommendation: that the Clause includes a formula to calculate “sufficient quantity”.

17. *Duty to protect against risk of backflow (Clause 27)*: By definition in the Bill a drinking water supply already includes infrastructure and

processes to transmit drinking water. Therefore the word “if” should be replaced with the word “where”.

Recommendation: The clause is reworded to - (1) ~~If~~ Where a drinking water supply includes reticulation, the drinking water supplier must ensure...

18. **Duty to ensure end-point treatment (Clause 28):** NMH would like to see the wording in this Clause aligned with the definition of “*point of supply*”, Recommendation: The clause is reworded to - (1) (1) If a drinking water supply includes end-point treatment for the purposes of complying with rules, the drinking water supplier is responsible...”

19. **Duty of officers, employees, and agents to exercise due diligence (Clause 29):** The terms “employees” and “agents” are not defined in the Bill therefore is open to interpretation. It would be valuable to also have the term operator defined.

Recommendation: that the term “operator”, “employees” and “agents” are defined within the Interpretation section.

20. **Owner must have drinking water safety plan (Clause 30)** This clause refers to the process when an owner makes “material changes” to water safety plan. However the term “material changes” is not defined.

Recommendation: that the term “material changes” is defined within the Interpretation section.

21. **Drinking water safety plans (Clause 31):** this clause states that “A drinking water safety plan must— (j) where a drinking water supply includes reticulation, provide for the use of residual disinfection”. The phrase “*provide for*” does not imply that residual disinfection has to be implemented, if that is the intention. This contrasts with the Taumata Arowai Draft Drinking Water Supply Operational Compliance Rules, Dec 2020: Chapter 2.2 Small Drinking Water Supplies, Table 7, Rules 8 & 9 and Chapter 2.2.3 Distribution System Compliance Monitoring Rules, Table 11, Disinfection. These require monitoring of free available chlorine (FAC), which supposes that residual disinfection by chlorine is already in place.

Recommendation: that the Clause is altered to “A drinking water safety plan must— (j) where a drinking water supply includes reticulation, show that residual disinfection has been installed, and is operated and maintained at all time water is treated.

- 22. Taumata Arowai to review drinking water safety plans and monitor compliance (Clause 32):** The Bill does not contain anything specific on what a review will entail, unless subsection 2(a) implies that there is to be a set of criteria against which plans are to be reviewed. In the general discussion documents outside the Bill, it appears that there is to be no approval process by Taumata Arowai therefore it is unclear what the purpose of a review is. In consideration of subsection 2(a), if relevant, a review must have a component of approval, adequacy assessment etc., to determine if it meets the criteria i.e. – if a plan is received and reviewed but does not meet a required standard, will it not therefore be rejected as inadequate? In contrast, if a plan is received and reviewed and found to be adequate, will this not therefore imply that it has been approved by Taumata Arowai?

Recommendation: That the term ‘review’ is defined and further information specifying what a review will consist of.

Recommendation: That the clause clearly states whether the review process is akin with an approval process.

- 23. Planned events (Clause 33):** This section applies to a planned event, such as a festival or other organised gathering or camp, where the organiser intends to supply drinking water to persons attending the event. Planned Event or temporary drinking water supply is not defined. There are numerous events that might meet a general definition and therefore be captured by clause 33 but which pose no risk and would be unduly onerous for both the regulator and the event organisers to administer. It is also unclear what the process for review and approval for temporary drinking water safety plans would be.

Recommendation: the definition of planned event and temporary drinking water supply is tightened

Recommendation: that the review and approval process for temporary water safety plans is set out.

33 (4) *Taumata Arowai may register a temporary drinking water supply, subject to any conditions it considers necessary to ensure that the drinking water is safe and complies with drinking water standards.*

A planned (temporary) event will likely not comply with the Drinking Water Standards. Microbiological aspects yes, but not necessarily protozoa, chemical or radiological determinands, unless there are very specific standards compiled for temporary events that take into account the nature of such events.

Recommendation: amending the wording to ‘...complies with relevant parts of the drinking water standards’.

24. Notification duties of drinking water supplier (Clause 36)

Notification regarding operation of other suppliers

(2) A drinking water supplier must notify Taumata Arowai of—

(b) material instances known to the supplier of the failure of another drinking water supplier to supply drinking water in accordance with the requirements of the drinking water safety plan, the drinking water standards, any enforceable undertaking entered into with the chief executive, or the requirements of any compliance order or other direction issued by Taumata Arowai or a compliance officer; and

(c) any material concern they have regarding the ability of the operator of a drinking water supply to maintain authorisation in accordance with sections 67 and 70.

It is noted that this requirement could be counter-productive to the objective in Section 3 (d) of the Bill (build and maintain capability among water suppliers). It is also a departure from the existing regime of collaboration amongst supplies to share skills, experience and resources.

It is further noted that there is no offence created from non-compliance with this section.

Recommendation: delete this clause

25. Requirement for supplier to provide information to consumers and have complaints process (Clause 38)

(1) A drinking water supplier must, in accordance with regulations that apply to the supplier,—

(c) report annually to Taumata Arowai on its consumer complaints process.

It is not clear on the benefit to be achieved from this section, the collection and analysis of which may require a large administration service (as highlighted by the “scale, complexity and risk” statement in Section 40

It is difficult to see how the phrase “in accordance with regulations that apply to the supplier” affects the requirements of this clause. Subsections 1(a), (b) and (c) appear to be specific and required, regardless of this phrase.

Recommendation: Reconsider the requirement to report annually on complaints processes.

Recommendation: Clarify what is meant by “in accordance with regulations that apply to the supplier” in the context of this clause.

26. Review by Taumata Arowai (Clause 39). The wording in this clause appears cumbersome therefore simplifying the language would be beneficial to the reader.

Recommendation: (2) *Taumata Arowai must investigate the drinking water supplier’s handling of the complaint and take any action necessary that Taumata Arowai considers necessary as a result of Taumata Arowai’s findings.*

(3) (d) *the complainant is not directly affected by the subject matter. does not have sufficient personal interest in the subject matter of the complaint;*
or

27. Source water risk management plans (Clause 42):

It is noted that Local Authorities are to contribute to the development and implementation of these source plans. However, any catchment owner should also be involved e.g. Department of Conservation, Forestry Companies. It is noted that non-Council suppliers are unlikely to have the ability/authority to manage/monitor/control/eliminate risks within the source water catchments if they do not own that land.

Recommendation: that the New Zealand Drinking-water Safety Plan Framework, and the Handbook for Preparing a Water Safety Plan be updated to reflect a greater emphasis on source risk management.

28. Suppliers to monitor source water quality (Clause 43): In principle, NMH supports the protection of source water quality. In relation to small suppliers, consideration needs to be given to the level of monitoring required. Compliance is assessed on treated water, and source testing adds extra costs to community supplies.

It is noted that monthly bacterial, 3-yearly chemical and monthly pH, turbidity and temperature sampling of raw/source water, as proposed in the *Draft Drinking Water Supply Operational Compliance Rules*, Dec 2020, Chapter 2.1, Table 2, are not effective for daily management of a water treatment plant

43 (3) A drinking water supplier must report the results of the supplier's source water quality monitoring to Taumata Arowai, and Taumata Arowai must provide regional councils with monitoring results annually

Recommendation: Review the proposal to require source water monitoring, with the exception of chemical determinants, or review the proposed parameters and intervals.

29. Information sharing with local authorities; and 45 Regional Council's to publish information about source water (Clause 44-45)

There seems to be a duplication of process in these sections e.g.

- Taumata Arowai must provide local authorities with information on the location of abstraction points provided by water suppliers. However,

Regional Councils will grant consent to take that water, so will already have the information

- Regional Councils have to provide Taumata Arowai with information on source water quality (Clause 45 (1)). However, under Clause 43(3) a supplier has already given both agencies that information.

**30. Power to issue or adopt drinking water standards (Clause 46);
Aesthetic values for drinking water (Clause 47)**

Clause 46 (1) says the Governor-General may issue or adopt standards, yet Taumata Arowai must issue or adopt aesthetic values.

Recommendation: amend the wording

“The Governor-General must issue or adopt standards...”

Taumata Arowai may issue or adopt aesthetic values...”

31. Power to issue or adopt drinking water standards (Clause 46)

(3) Drinking water standards must not include any requirement that fluoride be added to drinking water.

This reference is mirrored in the introduction to the draft Drinking Water Standards for New Zealand as part of the Exposure Draft documents released by Taumata Arowai Dec 2020 i.e.

“The standards do not promote drinking-water as a means of addressing dietary deficiencies. Consequently, they do not specify minimum determinant concentrations required to achieve beneficial health effects. In particular, they do not specify the concentration of fluoride required for benefiting dental health, nor do they state a requirement for water fluoridation.”

It is noted that these statements do not align with proposals in the Health (Fluoridation of Drinking Water) Amendment Bill 2016:

5 Section 69A amended (Purpose)

After section 69A(2), insert:

“ This Part also—

- (a) enables district health boards to direct a local authority drinking-water supplier to add fluoride or not to add fluoride to drinking water supplied by that supplier; and*
- (b) requires the local authority drinking-water supplier to comply with the direction.”*

Recommendation: that the Water Services Bill and Health (Fluoridation of Drinking Water) Amendment Bill 2016 aligned

32. Duty to renew annual registration and notify changes (Clause 55)

- (1) The owner of a registered drinking water supply must, in each 12-month period, during a month allocated for the purpose by Taumata Arowai, apply for a renewal of registration of the owner’s supply.

It is noted that a system to collect, track, amend and renew registration each year would be very labour intensive and time consuming.

Recommendation: Review the purpose of and benefit to be achieved by requiring annual registration renewal.

33. Exemptions (Clause 56)

- (1) The chief executive may, by notice in the *Gazette*, exempt any drinking water supplier or class of drinking water supplier from compliance with the following requirements in this Act:
 - (a) to supply safe drinking water (see **section 21**):*
 - (b) to comply with drinking water standards (see **section 22**):*
 - (c) to take reasonable steps to provide aesthetically acceptable drinking water (see **section 24**):*
 - (d) to provide a sufficient quantity of drinking water to consumers at each point of supply (see **section 25**):*
 - (e) to protect against the risk of backflow (see **section 27**):*
 - (f) to ensure end-point treatment (see **section 28**):*
 - (g) to have a drinking water safety plan (see **section 30**):*
 - (h) to keep records (see **section 37**):*

*(i) to provide information to consumers and have a consumer complaints process (see **section 38**).*

There may be benefit in allowing exemption from compliance to parts of the Act, rather than an all or nothing approach.

It is noted that exempt supplies still need to register (s23), notify insufficient quantity of water or imminent risk (s26), and take due diligence (s29).

Recommendation: allow exemption from parts of the Act, for specified periods, rather than all the listed sections.

Recommendation: make it clear what obligations exempt suppliers still have to meet.

34. **Exemption: residual disinfection (Clause 57)** The phrase “provide for” does not imply compulsion, therefore it would be more beneficial, if this was the purpose of the clause, to include a more direct statement. An example of an interpretation of ‘providing for chlorination’ are where a treatment plant has a chlorine system that can be turned on temporarily for a short time in the event of an E. coli transgression. Such a supply has potentially ‘provided for’ chlorination. It is noted that the equipment and processes to operate a residual disinfection system are not always simple. Applying this requirement to reticulated supplies as small as two households does not seem cost effective.

Recommendation: that this Clause states a requirement for the installation, operation and maintenance of residual disinfection, if the intention of the clause is to compel suppliers to maintain residual disinfectant in their reticulations at all times.

35. **Taumata Arowai may declare drinking water emergency (Clause 58)**

6(c) and 7 obligations seem to duplicate each other and will result in the same outcome.

Recommendation: that duplication within the clause is removed.

36. **Compliance officer powers where serious risk to public health exists (Clause 104).**

A compliance officer is tasked in clauses 102 and 104 of identifying and responding to public health risks. The criteria for appointing compliance officers in clause 97 does not include any requirement for officers to have qualifications/experience/expertise in public health matters. This appears to be an area of high risk to Taumata Arowai, suppliers and the general public unless the Bill otherwise mandates collaboration with public health authorities. The Bill should include a statutory requirement for compliance officers to liaise with Medical Officers of Health to report risks. In similar vein to Paragraph 11 of the Testing Order for COVID-19, Medical Officers of Health should be informed and have the ability to request records as needed when risk is presented.

Recommendation: that compliance officers have qualifications/experience/expertise in public health matters

Recommendation: that Medical Officers are consulted where serious risk to public exists and that Medical Officers of Health are able to see all relevant information in a timely manner

The list of actions to be taken by the compliance officer are less than those in Clause 61(2) Special powers of Taumata Arowai during drinking water emergency

Recommendation: that the list of actions in Clause 104 and Clause 61(2) are aligned.

37. **Liability of volunteers (Clause 160)**

(1) **Subsection (2)** applies in a prosecution for an offence against any section listed in the following table:

Section Description

- | | |
|------------|--|
| 163 | <i>Negligence in supply of unsafe drinking water</i> |
| 165 | <i>Negligence in failure to take immediate action when drinking water unsafe</i> |
| 167 | <i>Failure to provide sufficient quantity of drinking water</i> |

Section Description

178 *Failure to advise consumers about, provide, and report on complaint process*

182 *Failure to comply with duty of due diligence*

(2) A volunteer acting in that capacity may not be charged with an offence to which this subsection applies.

*(3) In this section, **volunteer** means a person who is acting on a voluntary basis (whether or not the person receives out-of-pocket expenses).*

It is noted that volunteers can still be charged with a variety of offences

Recommendation: the Bill should take cognisance of the fact that many non-council small suppliers rely on voluntary labour to keep their supplies operating and that the liability provisions may have the effect of discouraging their participation, and therefore the schemes ability to achieve compliance.

38. Information sharing with regulatory agencies (Clause 194) It is not clear if the exchange of information and documents between Taumata Arowai and a regulatory agency (and reverse) includes their sub-contractors collecting, analysing and reporting on that information e.g. ESR (drinking water on-line, EpiSurv, drinking water Aotearoa; or other consultants.

Amendments to Local Government Act

39. Subpart 1 of Part 7 replaced (Clause 198)
In Part 7, replace subpart 1 with:

124 Interpretation

In this Part,—

assessment,—

(a) in relation to drinking water,—

(i) means an assessment of drinking water services available to communities in the district of the territorial authority, including private and community-owned or community-operated drinking water supplies; but

(ii) does not include assessments in relation to domestic self-suppliers; and

community means, subject to subsection (2), a community constituted under [Schedule 6](#)

(2) The meaning given to the term **community** by subsection (1) does not apply in relation to—

- (a) [section 3](#); or
- (b) the definition of the term long-term plan; or
- (c) any of the provisions of [Parts 2 and 6](#); or
- (d) any of the provisions of [Schedules 10 and 11](#); or
- (e) any other provisions of this Act in respect of which the context otherwise requires.

Community is not defined in the Water Services Bill, but is in the Local Government Act (LGA), where it talks of them being constituted under Schedule 6. Part 7 of the LGA is not excluded from sub section (2) above. One implication is that clusters of houses that are not constituted will not be assessed for water and sanitary services.

Recommendation: review the meaning of community and include a consistent one in both the Water Services Bill and Local Government Act.

40. **Subpart 1 Specific obligations to make assessments of drinking water, wastewater, and sanitary services and to ensure communities have access to safe drinking water (Clause 198)** NMH notes that the defining of drinking water services includes mention of commercial premises to which drinking water is supplied. This is the first time commercial premises have been specifically targeted and it would be useful to have context for the reasons for including them and the consequences (if any) for doing so.
41. **Transitional, savings, and related provisions (Schedule 1) Provisions relating to this Act as enacted (Part 1) Drinking water safety plans (Clause 4).** This clause includes a requirement that

supplies serving >500 population must provide Taumata Arowai with a drinking water safety plan that complies with **section 30(1)** within 1 year after the commencement date. Many water safety plans approved under the Health Act 1956 are in the “old” format. Given the complexity of the “new” format plans, and the time to get them to appropriate standards under the current regime, it is unlikely that suppliers will be able to meet this deadline.

Recommendation: extend the time to update water safety plans to 2 years.

42. Amendments to enactments (Schedule 2) S196 Part 1 Amendments to Acts Building Act 2004 (2004 No 72) and Building Regulations 1992 (SR 1992/150): The Water Services Bill excludes domestic self-supplies, yet the amendments to the Building Act and Regulations require compliance with the drinking water standards. The draft exposure standards released by Taumata Arowai December 2020 include this statement:

The standards apply to all supplies, regardless of the nature of the source water in use, and number of people served by the supply. All consumers on a supply should receive water that meets these standards and therefore the standards must be met at all points in a distribution system. While the standards establish limits on the composition of the water all consumers should receive, they do not specify the monitoring required to show, to an acceptable level of confidence, that they are being met. Monitoring requirements and other compliance criteria are contained in operational compliance rules produced by Taumata Arowai.

This suggests that monitoring requirements for domestic self-supplies will be developed to allow them to show on-going compliance with the drinking water standards.

Recommendation: that the monitoring requirements for domestic self supplies are stated within compliance rules

Conclusion

43. NMH thanks the Health Select Committee for the opportunity to comment on the Water Services Bill.
44. NMH **does not wish to be heard** in support of its submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Lexie O'Shea', with a stylized, cursive flourish extending to the right.

Lexie O'Shea
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