



13 August 2013

The Chief Executive  
Ruapehu District Council  
Private Bag 1001  
Taumarunui 3946

Dear Sir,

**Re: Ohura water treatment plant**

I understand that the Ruapehu District Council has resolved to work towards a referendum regarding the closure of the Ohura water treatment plant. Thank you for the opportunity to express my views in relation to the Ohura water supply, as required by Section 131 of the Local Government Act 2002.

In March 2014, Population Health completed a Health Impact Assessment which examined options for the Ohura water supply. The conclusions of that Health Impact Assessment provide the basis for my views in relation to this matter. I have attached a copy of the Health Impact Assessment in support of this letter.

I do not support the closure of the Ohura Water Treatment Plant, and it is my view that its closure would lead to negative health impacts for the community of Ohura.

Closure of the Ohura water treatment plant would result in Ohura households relying on roof collected rain water and rain water tanks for their water needs. The microbiological quality of stored roof collected rainwater is directly impacted by roof catchment and run-off contamination. Faecal contamination comes from birds, animals and insects on the roof, in the gutters, or in the water tank itself. There is strong evidence of faecal contamination in a large proportion of rainwater tanks in New Zealand, indicating the possible presence of disease causing micro-organisms. Several disease outbreaks have been associated with tank water. Infection with disease causing micro-organisms from contaminated water would usually result in a short term illness, but in a small number of people severe longer term health effects can occur. Young children, the elderly and those with impaired immune systems are more vulnerable to the health risks associated with drinking contaminated water.

The operation and maintenance of rainwater tanks is generally the responsibility of the individual householder. The quality of water from rainwater tanks is therefore likely to be more variable than the water from a reticulated community supply. Roof collected rain water can provide a suitable drinking water supply if the water collection system is well maintained, however a number of surveys have found that maintenance of roof water collecting systems in New Zealand is poor. For example fifty percent of households surveyed in one study of 560 households had no measures in place to safeguard the water against microbiological contamination. Maintenance of roof collected rain water systems requires understanding, motivation, appropriate equipment and, unless the home owner can purchase assistance, a degree of physical ability.

The current reticulated water supply in Ohura is subject to regulation and monitoring to ensure the quality and safety of water delivered to the consumer. The treatment plant achieved bacterial compliance for the 2012/2013 year.

A continuous supply of water has been provided to Ohura from the current reticulated water supply, even during periods of summer drought (although water restrictions have been put in place during such periods). In contrast, we have estimated that a family relying on rain water tanks would have experienced a water shortage every year for the last ten years, if they continued to utilise water at the current average rate for the town. Residents using rain water would learn to conserve water, but would still have been likely to have experienced a water shortage during the driest summers of the last decade. The cost of purchasing water from water carriers during drought periods would reduce the affordability of water for Ohura residents.

I recognise that affordability is an issue for the ongoing use of the Ohura water treatment plant and reticulation. However, closure of the treatment plant will not necessarily improve affordability for the Ohura population. When loans are utilised to meet installation costs, the annual household loan repayments are likely to be greater than current water fees (based on Ruapehu District Council estimates). In addition there are likely to be other associated costs for households, including from maintenance and purchasing water during times of drought. Attempts by residents to reduce annual costs could result in the neglect of maintenance or failure to install appropriate systems, leading to an increased risk of water contamination. The tank and equipment will eventually require replacing, a cost that may not be achievable for many residents unless there is further support from Council.

Closure of the treatment plant could have a significant social impact on the town. At least one significant business has indicated that it is likely to close rather than install rain water tanks.

The Ruapehu District Council received a drinking water subsidy from the Ministry of Health in 2008 to improve the Ohura drinking water systems. The Council applied for this subsidy and submitted a sustainability plan. The subsidy was provided on the understanding, that the current supply would be maintained for the reasonable future. Closing the treatment plant will waste the government's investment.

Water is less affordable in Ohura than in other towns within the Ruapehu District as a consequence of low median incomes within the town and high water charges. I recommend a flat water rate across the Ruapehu District, which would assist water affordability for the Ohura community. When spread across the district a flat water rate would have minimal impact on other communities.

It is my view that Ruapehu District Council should not close the Ohura water treatment plant, but should continue to supply treated reticulated water to the Ohura community.

Kind regards



Dr Richard Wall  
Medical Officer of Health

Copy to: Pauline Welch, Group Manager Customer Services, Ruapehu District Council