
11.06.2025

To Taumata Arowai

Re- Consultation on proposed Changes to Acceptable Solutions

The below feedback is provided by the Association of Hydraulic Services Consultants Australia – New Zealand Branch (AHSCA-NZ)

Hydraulic services consulting is a specialised discipline concerned with the flow and conveyance of, water, sewer, stormwater and gas services.

Hydraulic Services, and the design of these services, help maintain a minimum level of public health standards throughout the developed world, and it helps prevent the spread of disease.

Just like builders need architectural plans to construct a building, Plumbers, Drainlayers and Gasfitters need a set of hydraulic drawings to ensure liquids safely go where they need to.

The World Health Organisation (WHO) has produced a document, Health Aspects of Plumbing, which “examines the microbiological, chemical, physical and financial risks associated with plumbing”. If minimum standards are not followed, there can be dramatic effects on worldwide health. The WHO estimates that approximately 3.1 million people die per year because they do not have access to safe drinking water and sanitary systems.

Hydraulic Services in New Zealand is the design and documentation of plumbing, drainage and gas services including, but not limited to:

Sanitary/Sewer plumbing and drainage.	Potable Hot, cold, and warm water supply.
Water storage, treatment & distribution systems	Hot water generation plant.
Onsite wastewater treatment including grey water and black water treatment systems.	Non -potable water supplies.
Trade waste.	Natural gas and liquefied petroleum gas (LPG) supply.
Pumpstations, sewer and stormwater.	Laboratory Gases (not all Hydraulic consultants cover this).
Backflow prevention.	Medical gases (not all Hydraulic consultants cover this).
Stormwater systems, including downpipes (excludes water proofing).	Fire protection (not all Hydraulic consultants cover this).
Syphonic rainwater systems.	Expert Witness services (not all Hydraulic consultants provide this)
Stormwater treatment systems.	Peer reviews and Site Observations

The New Zealand Association is made up of members based in different parts of New Zealand, almost all the members have come from a plumbing and drainlaying background where they have eventually moved away from day-to-day hands-on work and into Hydraulic Consulting and Design, therefore have a wide a varied range of skills, knowledge and experience to be able to comment on this consultation.

For the submissions members have provided feedback to the main areas that they work within, thus not all proposals have been specifically addressed.

Feedback has been summarized and is provided below.

Proposal 1 – Making all the Acceptable Solutions based on supply type rather than some being based on source water type.

The Association is **broadly supportive** of the proposal to restructure Acceptable Solutions by supply type, rather than by source water type.

In answering the question posed within the consultation document we feel that this should provide for greater clarity and alignment across different supply situations.

It is good to see that backflow has been noted specifically.

We are cautious with respect to the inclusion of surface water collection as typically the risks associated with the collection of that water is higher due to numerous environmental factors, we suggest a robust treatment and monitoring regime is put in place within the acceptable solutions.

Proposal 2 – Allowing end point treatment where the UV disinfection systems are not validated in some circumstances.

The Association **does not support** this proposal, and cost should not outweigh public health.

Removing the requirement opens up the risk of cheap and cheerful installations with inadequate treatment systems, yes, they are maybe cheaper than validated systems, but you can just about guarantee TEMU will be selling unvalidated units which potentially could lead to a serious public health risk.

Ensuring ALL systems have a validated disinfection system creates a level playing field and a minimum level for public health requirements.

Proposal 3 – Suppliers to provide information to consumers.

The Association **supports** this proposal.

Proposal 4 – Aligning the Acceptable Solution for Self-Supplied Buildings with the Rules requirements.

The Association supports the proposal to allow up to 10 buildings to be supplied from a single treatment system on the same property under common ownership, this is a sensible approach.

The Association supports the proposal for increased inspections of storage tanks every three months, simply because of what has been observed on many properties by our members, despite good installation intentions, maintenance typically slips to save money, if you do not have to do it then why spend the money? If there is something enforceable then that will help change the owners' behaviors for regular inspection and maintenance regimes with these water tank systems.

Proposal 6 – Specific performance criteria to address turbidity

The Association supports this proposal.

Proposal 10 – Clarifying the responsibility of property owners.

The Association recommends that reference to the Plumbers Gasfitters and Drainlayers Act is included, refer proposal 14 response for context.

Proposal 9 – Removal of Post-Treatment Monitoring Requirements

The Association received mixed feedback on this proposal, without post-treatment monitoring, it is unclear how water suppliers will demonstrate the ongoing effectiveness of their treatment systems.

This change could introduce unintentional public health risks, particularly when systems rely on variable source waters such as surface water or are serving small, decentralised supplies.

Proposal 14 – Removal of references to Building Act requirements.

The Association does not support this proposal.

It is important to retain these references to ensure it's clear that installation of endpoint treatment systems within property boundaries must comply with both the Building Act and the Building Code.

Removing these references risks creating confusion and unintentionally promotes potentially illegal practices by persons unauthorized to undertake restricted work.

The Association also strongly recommends the inclusion of referencing the Plumbers Gasfitters and Drainlayers Act 2006.

It is important to make clear that any work defined as 'sanitary plumbing' under this Act — including the installation of water supply pipework and water treatment systems within a property boundary that supplies water to sanitary fixtures and appliances — is authorised plumbing work and must only be carried out by an authorised plumber.

The meaning of sanitary plumbing is provided below for reference, refer to (c) highlighted below.

Version as at 6 December 2023



Plumbers, Gasfitters, and Drainlayers Act 2006

Public Act 2006 No 74
Date of assent 4 December 2006
Commencement see section 2

6 Meaning of sanitary plumbing

- (1) In this Act, unless the context otherwise requires, **sanitary plumbing** means—
- (a) the work of fixing or unfixing any sanitary fixture or sanitary appliance, or any associated fittings or accessories;
 - (b) the work of fixing or unfixing any trap, waste or soil pipe, ventilation pipe, or overflow pipe connected with or intended to be connected with or accessory to any sanitary fixture or sanitary appliance or any drain (whether or not the sanitary fixture, sanitary appliance, or drain is there when the work is done);
 - (c) the work of fixing or unfixing any pipe that—
 - (i) supplies or is intended to be a means of supplying water to any sanitary fixture or sanitary appliance (whether or not that sanitary fixture or sanitary appliance is there when the work is done); and
 - (ii) is within the legal boundary of the premises on which that sanitary fixture or sanitary appliance is or will be installed (whether or not that sanitary fixture or sanitary appliance is there when the work is done);
 - (d) generally all plumbing work associated with any sanitary fixture or sanitary appliance.

Proposal 16 – Backflow prevention requirements.

The Association **supports** this proposal as members have observed too many situations where air gaps have been put in place but have been altered creating a backflow risk.

The association appreciates that this maybe a cost, however public health trumps cost in our professional opinions.

Proposal 20 – Competency

The Association **supports** this proposal, highlighting the fact that in situations where the water supply system or endpoint treatment device falls within the scope of 'sanitary plumbing' as defined by the Plumbers, Gasfitters, and Drainlayers Act 2006, those works are to be carried out by a person authorized by the Plumbers Gasfitters and Drainlayers Board. Those persons are registered under statute.

Feedback on other Matters

Guidance needs

Many people involved in the water and plumbing industries are visual kinesthetic learners, visual pictures and clear diagrams provide for better capture and understanding than an abundance of text.

Implementation concerns

Coordination with the plumbing industry is essential, practitioners will be responsible for installing many of the systems covered by these proposed Acceptable Solutions.

The Association suggests that Tuamata Arowai work closely with the Plumbers Gasfitters and Drainlayers Board when the roll out of the updated Acceptable Solutions occurs.

In closing The Association will watch with interest to see how this proposal progresses, ultimately the Association firmly believes the health and safety of the public should be the driver in any decision making.

11.06.2025

Regards

A handwritten signature in black ink, appearing to read "Nick Fleckney".

Nick Fleckney
President AHSCANZ



Website: [Home - AHSCA](#)