

Tuesday, 12 July 2022

OIA IRO-239 @rnz.co.nz Email: Kia ora

Official information request for internal communications related to fluoride.

I write regarding your official information request dated Monday, 11th April 2022. On Thursday, 16 June 2022 you clarified the scope of your request and requested:

- 1. Any emails, written correspondence or other relevant communications between Wellington Water, Wellington City Council, Porirua City Council, Hutt City Council, and Greater Wellington Regional Council of the first instance each party was first alerted to the fluoridation issue.
- 2. Any emails, written correspondence or other relevant communications between Wellington Water staff regarding the same fluoridation issue.
- 3. I want to find out when Wellington Water staff first found out of the fluoridation issue, when Wellington Water management were first made aware and when council was told.
- 4. I also want to know if a decision was made to not tell the council/public back in November and what the reasonings were to this.

Please see in our email response to you:

- 1. Your first question: Internal and External Communications
- 2. Your second question: WWL Staff Communications Regarding Fluoride Issue
- 3. Your third question: Item of Significance

For further reference, the independent inquiry into the cessation of fluoride is available on our website, and you can find that report here: https://www.wellingtonwater.co.nz/yourwater/drinking-water/fluoride-inquiry

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Ngā mihi

**Group Manager, Network Management Group** Wellington Water Ltd

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@wellington\_water

## **SLT Meeting 10 March 2022**

### **DRAFT Minutes**

### 1. Opening Karakia

### 2. Health & Safety Moment

### Omāroro Fatality

Discussed the people side of things. Agreed to follow through with HEB/Rees whānau to decide on how we honour the legacy of the individual concerned.

Then discussed the process. Agreed:

- 1) To converse with Worksafe over the process we are following and seek if possible confirmation
- 2) To layout the investigation process across all 5 PCBU's involved. The key is to complete a professional review, determine the lesson's learned and make the improvements. Peer review of this will ensure we are confident.
- 3) We now need a Board paper to give the Board assurance that the process we are following is robust and professional once submitted.. Once received can be passed to councils and Water Committee.

### Omicron

Thank you for the table which updates us on the Omicron risk to the business gong forward. We agreed to send this to CCRs/ CE's; Board/Water Committee.

The Omicron team meet 2x per week to review the situation which is likely to deteriorate based on general NZ exposure. Were assured key Opex GM's that we are over the issues and there is no current risk to business.

We suggested a series of scenarios be undertaken to stress test our response to worst case scenarios.

### 3. Review of our approaches to Councils

We reflected on the discussion we had 2 weeks ago about our councils and the approach we wanted to take with them. Our final product includes:

- a) Be more documented, less informal;
- b) Be better planned especially around assumed risk
- c) Be satisfied to hold the line on what is reasonable, don't over please or placate

- d) Maintain the regional model as much as we can
- e) We're funded to do core business. Water reform is determined by our owners
- f) Play the structure not the people, and
- g) Practice over communication!

Let's take these principles out to GLT, stress test there, and then bring them back to SLT to close out.

#### 4. Water Reform

Three aspects:

### a) Governance Review

to prepare summary for internal Comms

### b) Working Group

- Keep communicating activities
- Layout programmed going forward
- Seek to understand whey they need the data
- HR done. ICT and Data next
- Record hours to seek reimbursement of cost.

### c) <u>NTU</u>

- Note job adverts, GM's to open dialogue with any interested party so we have some sense of scale and possibility of partnership acrss all aspects.
- Keep engaging
- We will develop a risk register to document key interface threats/ opportunities share with councils.
  - Water supply
  - Over programming capex

#### 5. WWTP

### 5.1 Review and implementation plan

Draft implementation plan on the 23<sup>rd</sup> of March. Final to Steering group by end of March then circulation.

Note, a single page summary is needed for circulation to Stakeholders.

### 5.2 Contract Management

confirmed in role. Key to get feel for the Health of the Contract and be clear about RMA issues, renewals and key risks. UV plants and driers.

### 5.3 Resourcing

Let's see the final resourcing plans.

### 6. Opex

### 6.1 21/22 Forecasts and next 2 years

Complete same deck pack as for WCC but fit for purpose for all councils.

Due end of March.

### 6.2 Operating Model

**Key Outputs** 

Full documented Opex approach to 22/23 completed before year starts. Address all risks with councils prior to 30 June 2022 Then develop a monthly/quarterly reporting tool which facilitates conversations with councils needed to keep with budgets. Let's see final scope back in 3 weeks.

Welcome

### 7. Year 2 and 3 Capex

Good stuff. Plenty of good comms material in here.

Noted the 150% over allocation.

Agreed to pick up a further allocation with the NTU as an opportunity.

Agreed to receive an update on the investment plan at the next SLT meeting. Need to get everything aligned so we have a clear run for the next 2 years.

### 8. People

Agreed to free up from the day to day as a priority. GM's to help full the gaps as necessary.

We then need to see active management of the leadership and engagement activities in readiness for Water Reform.

### Revised paper for the offsite please.

### 9. Comms

People OK with progress on the 4 key issues. Agreed to use the SLT Connect for engagement with the team.

Keep focused on Omicron, WWTP review and Regulation with Opex and Fiscal Stimulus in our minds eye.

### 10. Fluoride

Agreed on the plan. To be proceeded with full engagement with the GWRC before rollout

PS. Extra slot provided by GWRC for 15th.

### 11. Business Planning

Agreed to focus on a full day of work on this on the 6<sup>th</sup> of April. SLT offsite, business planning and the 22/23 Company budget.

### 12. Accommodation

Agreed with the NDD occupation of Level 5. Need new plans for how to expand our Level 6/ Level 4.

### Paper Please

### 13. Fiscal Stimulus

Agreed with the direction of the plan. Please ensure all risks are covered into the Opex operating model.

Close out VHCA carefully.

### 14. General Business

to lay out memo regarding expanding size of his role.

#### 15. Remuneration

Agreed across the board uplift below T2 and excluding front line staff who are eligible for the \$s uplift over 2 years. Ensure all adjustments go together.

### 16. Key Messages

### Omāroro

SLT talked about the tragic incident at our Omāroro site last week. They discussed the importance of supporting the people who have been affected by the event – the family of the man who passed away, workers on the site, and HEB. The Omāroro site has been blessed and HEB has support in place on-site for those impacted. SLT also discussed our upcoming investigation into the incident.

### **Omicron**

SLT and the H&S team talked about our response to Omicron and how our workforce is faring now that there is a high number of COVID-19 cases in the community. We're starting to see a number of cases within our whānau and we are monitoring how that will impact our work. We have a good supply of RATs which we are using to help manage COVID-19 on the front line and in our Head Office. We have also offered RATs to our contractor whānau.

### OPEX

In our quarterly review, SLT identified five areas that they would focus on in each meeting until they are no longer relevant. OPEX is one of these five areas. SLT discussed our OPEX budget, the challenges we are facing and how we communicate our position to councils. We are in the process of talking to councils about our OPEX budget and what it will mean for them in terms of the work we deliver. Over the next few weeks, we will be working to put together an informative, consistent way for councils to receive regular updates on how we are tracking so that they have a good understanding of our OPEX costs. This works into the business planning and budgeting project that is currently underway.

Other items of interest that will need to be communicated at a later date:

- WWTP Implementation
- Fluoride
- Stimulus funding

### 17. Closing Karakia – , thanks.

From: To: Cc: Subject: As discussed - communications and customer service materials Date: Tuesday, 15 March 2022 5:05:34 pm Attachments: image001.png Fluoride supply customer service materials (Toolkit).pdf Fluoride supply communications materials (Toolkit).pdf Kia ora, Apologises for how late these are! Attached are two documents, one for you and one for your customer services teams. Please do not distribute the communications material outside of your team until tomorrow. Please also note that the media release in the communications pack is not final and continues to be embargoed until tomorrow. We'll send you the final and let you know once it has been sent. Please let us know if you need anything else. We'll be in touch tomorrow (she/her) **Senior Communications Advisor** In the Petone Office: Monday, Wednesday and Friday Working from home: Tuesday and Thursday Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt www.wellingtonwater.co.nz

Wellington Water is owned by the Hutt, Porirua, Upper Hutt and Wellington city councils, South Wairarapa District Council and Greater Wellington Regional Council. We manage their drinking water, wastewater and stormwater services.

From:
To:

Cc:
Subject: Fluoride comms
Date: Monday, 14 March 2022 9:45:00 pm

Attachments: image001.png

Fluoride key messages.docx

### Kia ora koutou

This is just a quick update on where we are at for fluoride comms.

and I met with GWRC's comms manager today and we have agreed to issue a joint statement on Wednesday morning to announce our decision to stop fluoride dosing at Te Marua and Gear Island.

As discussed at SLT last week, we have started the process of working through the steps to notify our councils ahead of Wednesday's announcement.

Tomorrow will be a key day for us, and has already set up a time for you all and the CCRs at noon tomorrow to let them know about this issue. is also presenting to GWRC (officers and councillors) tomorrow morning to let them know and to outline our comms approach.

We will ensure that all our council comms teams and their customer hubs have a copy of the comms pack including Q&As to help the answer any questions they may get from the public. We will work with GWRC to lead any media enquiries. will be our spokesperson.

Below is the roll out schedule for in the lead up for Wednesday. Attached are our high level key messages that we will use to base our media release and external comms on.

Any questions, let me or know.

Roll out schedule				
Date	Time	Activity	Responsibility	Status
Mon 14	N/A	Council CEOs heads up		Completed
Mar		Water Committee Chair heads	14	
		up	30	
Mon 14	1.30pm	Agree comms approach with		Completed
Mar		GWRC comms		
Tues 15	9.00am	Heads up to WCC, PCC, HCC,		
Mar		UHCC comms		
Tues 15	9.30am	Briefing to GWRC		
Mar		-		
Tues 15	12.00pm	Briefing to WCC, PCC, HCC,		
Mar		UHCC CCRs	-	
Tues 15	12.00pm	Email to council CEs and Water		
Mar		Committee Chair		
Tues 15	1.00pm	Send comms pack to all council		
Mar	-	comms teams and their		

	1	customer hubs	
Tues 15	1.00pm	Update to RPH on status of	
Mar		WTPs and the project	
Tues 15	2.00pm	Notify New Zealand Dental	
Mar	NAX.	Association and provide them	
		with comms pack	
Wed 15	8.30am	Internal email to let our people	
Mar		know	
Wed 15	9.00am	Issue joint media release	
Mar			
Wed 15	10.00am	Update website	
Mar		50 E	
Wed 15	N/A	Work with and GWRC	
Mar		to respond to media enquiries	<u> </u>
		as needed	

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### Communications and Community Engagement Manager



Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt

### www.wellingtonwater.co.nz





## Fluoride supply communications plan

Monday 21 February

### **Background**

Wellington Water operates four fluoridation facilities, located at the four water treatment plants that supply the Wellington regional water supply network. Fluoride dosing is mandated by the Wellington's city councils, with the exception of Petone, Korokoro and South Wairarapa.

The fluoridation facilities are over 30 years old and have experienced ongoing issues that have reduced the safety and reliability of fluoridation and the consistency of the treated water fluoride concentration. Due to these issues, the percentage of time that the fluoride dosing facilities have been operational is poor.

Operational statistics for January 2019 to May 2020:

Water Treatment Plant	Fraction of time fluoridation was operational
Te Marua	10-20%
Waterloo	30-40%
Wainuiomata	10-20%
Gear Island*	55%

<sup>\*</sup>Since 1999 the Gear Island WTP has only been used as a standby facility and is typically only run on one or two days each month, to maintain operational readiness. However, the Gear Island fluoride facility doses continuously into the Wellington water supply (to accommodate the non-fluoridated Petone supply zone).

The poor reliability illustrated above is exacerbated by the fact that because fluoridation is not considered a critical water safety requirement, issues are most easily dealt with by shutting down fluoridation systems, with rectification and reinstatement of fluoride dosing taking a lower priority than other more critical tasks.

As of February 2020, both Te Marua and Gear Island Water Treatment Plants have stopped dosing fluoride, due to ongoing health and safety issues with the treatment plants.

This information has not been communicated to our client councils.

To rectify this, Wellington Water has started a two-phase project to improve the current poor performance and safety of the current fluoride dosing systems to meet the requirements of the Health (Fluoridation of Drinking Water) Amendment Bill and upgrade, medium to long-term, the fluoride dosing systems at each plant to comply with the Water New Zealand code of practice.

In addition, the Health (Fluoridation of Drinking Water) Amendment Bill passed through the Health Committee in Parliament in November 2021.

Water suppliers are now required to fluoridate a water supply if directed to do so by the Director-General of Health. Those already fluoridating will be required to continue to do so unless directed by the Director-General of Health to stop.

This is likely to place more emphasis on reliability of fluoride dosing.

### **Objectives**

- Rebuild the trust and confidence of our client councils and stakeholders in Wellington Water's drinking water systems and procedures.
- To inform our key stakeholders of the current condition of the fluoride dosing at the Water
   Treatment Plants and the work Wellington Water is doing to mitigate these issues.
- To inform the public of the current condition of the fluoride dosing at the Water Treatment Plants and the work Wellington Water is doing to mitigate these issues.
- Partners (iwi, councils, GWRC) have the information they need to answer questions from their audiences.
- Key stakeholders, partners and the community are well-informed about the work Wellington
   Water is doing to improve drinking water operations.

### Strategic approach

The communications approach for this project is dependent on which phase the project is in.

1. The aim of the first phase of the project is to improve the current poor reliability and performance of the current fluoride dosing systems to meet the requirements of the Health (Fluoridation of Drinking Water) Amendment Bill.

The communications team have developed a detailed stakeholder engagement and communications plan to inform key stakeholders of poor reliability issues at the same time as advising them of the short-term work Wellington Water is doing to mitigate these issues.

The communications approach for this stage of the project will be primarily stakeholder focussed. It is important that we inform them of poor reliability issues, and the dosing facilities shut down, at the same time as advising them of the short-term work Wellington Water is doing to mitigate these issues.

Externally there will be a project webpage, a media release, and we will be actively promoting the issues and work we're doing on social media.

2. The aim of the second phase of the project is to upgrade the fluoride dosing systems at each plant to comply with the Water New Zealand code of practice.

This includes an option assessment of the dosing systems for medium-term and long-term solutions to increase the reliability of the fluoride dosing to the network. Including estimated costs for each option – for each plant.

The communications team will keep key stakeholders engaged of the work and implement some 'light touch' external communications.

- 3. The aim of phase three and four is to:
  - a. carry out a detailed design for the preferred option for each plant,
  - b. provide upgraded cost assessment,

c. construct and commission the designed dosing systems in accordance with the gateway process

This communications plan outlines our communication approach and activities for the first two phases of the Fluoride Supply Project. Further communications will be required for phases three and four, including a detailed stakeholder management and risk mitigation plan.

If Petone and SWDC are included in phases three and four, future communications activities and risk registers will need to reflect this.

### **Key messaging**

The below key messages can be used on their own or in conjunction with the overarching story, depending on the audience or channel we're using.

### Overarching key messages:

- We add fluoride to our drinking water at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.
- The machinery we use to fluoridate water is over 30 years old and not operating as it should.
- This has resulted in an inconsistent and low level of fluoridation in our water.
- In February, we commissioned Stantec to undertake a review of our fluoridation facilities at our Wellington's metropolitan drinking water treatment plants, which confirmed that our equipment was not working correctly.
- Fluoridation of water needs to be provided at certain levels to be effective. As the equipment used to gauge the levels of fluoride dosing has been providing lower than required doses, we made the difficult decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while we work on a solution.
- This means that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.
- It is important that we supply safe and healthy drinking water to our communities and these issues mean we are unable to continue to fluoridate the drinking water in a way that provides the expected health benefit.
- As part of the review, Stantec provided us with some short-term recommendations to return fluoride to the water supply as soon as possible.
- We will start work on these recommendations as soon as practicable with an additional project to increase the reliability of our fluoride dosing systems in the medium to long-term running at the same time.
- Greater Wellington Regional Council has funded us to carry out this work as a priority.

### The project/s:

- We are installing more fluoride monitors to evaluate our dosing levels.
- We have commissioned Stantec to review the fluoride facilities and they have provided recommendations to make the plants more reliable.
- We will start work on these recommendations as soon as practicable.

 Alongside our work on the current fluoride dosing systems, Wellington Water is working on a wider project to increase the reliability of our fluoride dosing systems in the medium to long-term.

### Background:

- The Te Marua Water Treatment Plant supplies Upper Hutt, Porirua and the northern and western Wellington suburbs, and the Waterloo, Gear Island and Wainuiomata Water Treatment Plants supply Wainuiomata, Lower Hutt, and Wellington.
- We add fluoride to our drinking water at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

### The amendment bill:

- In November 2021, the Health (Fluoridation of Drinking Water) Amendment Bill passed through the Health Committee in Parliament.
- This means that water suppliers are now required to fluoridate a water supply if directed to
  do so by the Director-General of Health. Those already fluoridating the water supply will be
  required to continue.
- This has placed more emphasis on the consistent operation of the fluoride dosing facilities.
- It is expected that implementation will be phased over time, from mid-2022.

### **Spokespeople**

Wellington Water

### Audiences

Audience	What do we want them to know / do / understand	Channels to reach them
Our client council relationship (CCR) managers	Be familiar with the fluoride dosing issues at the Water Treatment Plants.      Understand our approach to mitigation (when it is available).      Use our key approved messaging.      Support our communications approach including working with the communications team to tailor consistent communication to our key	<ul> <li>Regular updates from the project manager to CCRs via email or in meetings</li> <li>Have the project team directly engage with CCRs prior to their regular meetings with their councils to ensure that they are across the latest progress.</li> <li>Or invite the project manager to the CCR/council meetings so councils can ask questions of the lead directly.</li> </ul>

SLT .	within Council.  Be familiar with the	
SLT	<ul> <li>Re familiar with the</li> </ul>	
	fluoride dosing issues at the Water Treatment Plants.  Understand our approach to mitigation (when it is available).  Use our key approved messaging.  Support us to maintain confidence with the Board, the Water Committee, Mayors and Councillors by being advocates  Staying consistent with messaging during their interactions with these key stakeholders.	<ul> <li>Respective SLT meetings, project manager could attend SLT meetings periodically to provide an update on progress.</li> <li>Clear guidance from the project manager on what's needed from SLT to support the project</li> </ul>
Wellington Water Board	<ul><li>stakeholders.</li><li>Be familiar with the</li></ul>	a I I walata ta Dagual ay
	fluoride dosing issues at the Water Treatment Plants.  Understand our approach to mitigation (when it is available).  Board Chair to directly engage with Water Committee Chair on our progress.  Support us to maintain confidence with the Water Committee, Mayors and Councillors by being advocates  Staying consistent with messaging during their interactions with these key stakeholders.	<ul> <li>Update to Board on approach and progress via monthly Board meetings.</li> <li>Provide the Board with key messages on progress so they can be consistent.</li> <li>is the board conduit for the Fluoride issues.</li> </ul>
The Customer Service Team	<ul> <li>Use our key messaging while communicating with external stakeholders.</li> </ul>	Regular meeting with comms

	Sal NEWSCHOOL CONTRACTOR OF	1
	Support our communications approach	
	10.7	
	and help us to reach the	
	right audiences with our	
	messaging.	
Wellington Water staff,	Be aware of the project.	SLT connect
contractors, and suppliers	Be ready to engage and	On Tap
	support if needed.	Our website
	External	
Our client councils (GWRC,	That we are working on a	CCR meetings
HCC, UPCC, PCC and WCC) –	short-term project to	Email
SLT, officers and elected	make our fluoride dosing	• Toolkit
members.	systems more reliable.	<ul> <li>Updates from Wellington</li> </ul>
	That the fluoridation	Water CE
	facilities have all	
	experienced ongoing	
	issues that have reduced	
	the availability and	
	reliability of fluoridation.	
	That Wellington Water is	
	working on a wider project	
	to increase the reliability	
	of our fluoride dosing	
	systems in the medium to	
	long term.	
	We will provide regular	
	updates on our progress.	
Our client council comms and	Use our key messaging	We will keep our client
customer service teams	while communicating with	council comms teams in
	external stakeholders.	the loop (as per our usual
	Support our	process) on any messaging
	communications approach	and media queries.
	and help us to reach the	We will supply a toolkit of
	right audiences with our	key messaging and FAQs
	messaging.	to our CC customer
		services teams.
МОН	Use our key messaging	Regular updates to
	while communicating with	(leads the MOH
	external stakeholders.	relationship with Comms
	Support our	guidance)
	communications approach	,
	and help us to reach the	
	and help as to reach the	

	right audiences with our	
	messaging.	
Water Committee	<ul> <li>That the fluoridation facilities have all experienced ongoing issues that have reduced the availability and reliability of fluoridation.</li> <li>That we are working on a short-term project to make our fluoride dosing systems more reliable.</li> <li>That Wellington Water is working on a wider project to increase the reliability of our fluoride dosing systems in the medium to long term</li> </ul>	Water Committee     meetings     Updates from WW CE
Media	<ul> <li>Inat the fluoridation facilities have all experienced ongoing issues that have reduced the availability and reliability of fluoridation.</li> <li>That Wellington Water is working on a project to increase the reliability of our fluoride dosing systems.</li> </ul>	Media release
Our customers / residents / Wellington public	<ul> <li>That the fluoridation facilities have all experienced ongoing issues that have reduced the availability and reliability of fluoridation.</li> <li>That Wellington Water is working on a project to increase the reliability of our fluoride dosing systems.</li> </ul>	Website/Social Media
Dental association	That the fluoridation facilities have all experienced ongoing	Email the Dental     Association with     information about the

issues that have reduced	issues with the plants and
the availability and	a request to pass onto
reliability of fluoridation.	their patients.
That Wellington Water is	951
working on a project to	
increase the reliability of	
our fluoride dosing	
systems.	

## Risks and mitigation

Risks	Mitigation
Reputational damage	Have a clear and concise communications rollout with
	tight messaging and timelines.
Key internal stakeholders (Client	Have clear communications plan and FAQs available
councils) have not been made aware of	prior to releasing any information about fluoride.
the inconsistent fluoride dosing at the	
WTPs.	Have clear information released to our key
	stakeholders, affected parties and the public as
	appropriate.
Wellington Water needs to be prepared	Have proactive information on the project available to
that information, regarding the	reference on the website.
inconsistent fluoride dosing at the	
WTPs, will be shared to media.	Inform the public proactively about the issues with
	the dosing systems and about the likely impacts of un-
	fluoridated water.
	Have clear and authentic information released to our
	key stakeholders, affected parties and the public.
The public have not been receiving	Have fluoride FAQs on the website.
consistently fluoridated water.	
	Engage with the media early (if required) and have
	clear and authentic information released to our key
	stakeholders, affected parties and the public.
Director General of Health has	Have a clear plan for the redesign and replacement of
mandated fluoride dosing; however,	the fluoride dosing systems with proposed timeframes
WW is not currently meeting this	to inform the messaging.
requirement.	
Internal staff, primarily those not in the	All internal issues are referred to the Project Manager.
project but have worked on fluoride	
dosing in the past, are at conflict with	
the priority and funding this project	
now has.	

Anti-fluoride advocates use the project	Have clear communications plan and FAQs available
as a 'springboard' for their agenda.	prior to releasing any information about fluoride.
	,
	Have clear information released to our key
	stakeholders, affected parties and the public as
	appropriate.
Director General of Health has	The estimated timeframe for any decision on
mandated fluoride dosing including	mandated fluoride dosing is mid-2022.
introducing fluoride into the Petone	
water supply.	If the Director General of Health does request the
	introduction of Fluoride into the Petone water supply,
	WW will respond with a separate communications and
	engagement plan focused on communicating the
	process, implications, and reasons for it to the public.
	This will be a significant undertaking.
Director General of Health has	The estimated timeframe for any decision on
mandated fluoride dosing including	mandated fluoride dosing is mid-2022.
introducing fluoride into the SWDC	
water supply.	If the Director General of Health does request the
	introduction of Fluoride into the SWDC water supply,
	WW will respond with a separate communications and
	engagement plan focused on communicating the
	process, implications, and reasons for it to the public.
	This will be a significant undertaking.

### Measurement

We will measure the effectiveness of our communications through:

- Traffic to our webpage
- Feedback from our client council communications teams

If needed, we will adapt our approach according to what our data is telling us.



## **Tactics and timing**

Timing	Activity	Priority	Responsible	Status
Week of 21/02	Regulatory Services briefing to Board	N/A		Complete
04/03/2022	Messaging and situation report provided to Board.	N/A		Complete
02/02/2022	MILESTONE: Communications approach drafted and sent to PM			Complete
02/03/2022	Messaging drafted	N/A	(A)	Complete
02/03/2022	FAQs drafted	N/A		Complete
02/03/2022	Website copy drafted	N/A		Complete
02/03/2022	Our client councils (GWRC, HCC, UPCC, PCC and WCC) – SLT, officers and elected members.     Wellington Water Board     MOH     Water Committee	N/A		Complete
07/03/2022	MILESTONE: Communications approach approved			Complete
By 09/03/2022	Customer Service Team     Client Council Comms Teams	N/A		Complete
By 09/03/2022	Story and messaging finalised	N/A		Complete
By 09/03/2022	FAQs finalised	N/A		Complete
By 09/03/2022	Webpage copy finalised	N/A		Complete

By 09/03/2022	Summary and announcement emails finalised	N/A		Complete
	<ul> <li>Our client councils (GWRC, HCC, UPCC, PCC and WCC) – SLT,</li> </ul>	2403	10 m	***
	officers and elected members.			
	Wellington Water Board			
	• MOH			
	Water Committee			
Week of 07/03	MILESTONE: Internal communications rollout begins	*	-	
Week of 07/03	Provide an overview of the fluoride issues to the board via email.	N/A		Complete
	These range from reputation, status and future timelines (when			
	we will advise councils etc.)	0		
10/03/2022	Brief SLT members of plan during an SLT meeting	N/A	Project Team	Complete
	<ul> <li>SLT item of significance including project overview and comms</li> </ul>			
	plan.			
	<ul> <li>Toolkit provided including key messaging, draft emails, FAQs and</li> </ul>			
	reactive lines			
10/03/22	to talk to (GWRC) about the issue	N/A		Complete
10/03/22	to speak to (Board) and (Committee)	N/A		Complete
14/03/22	Brief the GWRC comms team	HIGH		Complete
14/03/22	Brief the Wellington Water Customer Services team	MEDIUM		
	<ul> <li>Toolkit provided including key messaging, draft emails, FAQs and</li> </ul>			
	reactive lines			
15/03/22	MILESTONE: Content goes live			
15/03/22	Our client council comms teams	HIGH		Complete
	<ul> <li>Meeting and information pack (@1pm)</li> </ul>	9am		
	To inform the client council customer service teams		\$	

15/03/22	Workshop with GWRC led by	HIGH		Complete
		9.30am	5	
15/03/22	Our client councils (GWRC, HCC, UPCC, PCC and WCC) – SLT	HIGH		Complete
	Send email	Midday		
15/03/22	Brief our external client council relationship (CCR) managers	HIGH		Complete
	Meeting at midday	Midday		
15/03/22	Water Committee (entirety?)	HIGH		
	Send email	Midday		
15/03/22	RPH	MEDIUM		Complete
	Email update to Regional Public Health regarding the status of the	1pm		
	WTPs and the project.			
15/03/22	The New Zealand Dental Association	MEDIUM		Complete
	<ul> <li>Send email including toolkit - key messaging, FAQs, and reactive</li> </ul>	1pm		
	lines (info@nzda.org.nz )			
	<ul> <li>Ask about where people can find information on Fluoride</li> </ul>			
	additives outside of the water supply.			
16/03/22	Our customers / residents / Wellington public	HIGH		
	Website published	Morning		
	Social media posts			
16/03/22	Media	HIGH		
	<ul> <li>Joint GWRC release in appendix</li> </ul>	Morning		
18/03	MILESTONE: Water Committee Meeting			

Ongoing				
As required	Regular updates from the project manager to CCRs via email or in meetings			
As per meeting frequency	CCR TO COUNCIL MEETINGS  Have the project team directly engage with CCRs prior to their regular meetings with their councils to ensure that they are across the latest progress or invite the project manager to the CCR/council meetings so councils can ask questions of the lead directly.	Various/		
As per meeting frequency	SLT MEETINGS     Respective SLT meetings, project manager could attend SLT meetings periodically to provide an update on progress.     Clear guidance from the project manager on what's needed from SLT to support the project	Project team		
As per meeting frequency	BOARD MEETINGS     Update to Board on approach and progress via monthly Board meetings.     Provide the Board with key messages on progress so they can be consistent.	/Project Manager		
As per meeting frequency	WATER COMMITTEE MEETINGS     Update to committee on approach and progress via meeting.	/Project Manager		



### **Appendix**

### 1. Reactive lines

Upper Hutt, Porirua and the northern and western Wellington suburbs have not been receiving Fluoride, why?

We are working on a project to increase the safety and reliability of fluoride dosing.

The machinery we use to do this, at Te Marua and Gear Island, has been experiencing ongoing issues that has reduced the safety and reliability of fluoridation in the treated water.

Because of this, we have needed to stop the fluoride dosing facilities at these plants. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

We add fluoride to our drinking water at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

### 2. Board messaging

See Fluoride update to Chair of Board.pdf

### 3. Media release

Wellington's drinking water fluoridation facilities are aging and in need of repair Embargoed until 9.30am, Wednesday 16 March 2021

Wellington Water is working quickly to repair equipment that fluoridates the regional drinking water supply, which a recent Wellington Water review found is not working consistently.

"Our fluoridation machinery is over 30 years old and not operating as it should, which has resulted in an inconsistent and low level of fluoridation in our water," says Greater Wellington Regional Council Chief Executive

"The review also identified operational health and safety risks at the Te Marua and Gear Island Water Treatment plants. Because of this, Wellington Water made the difficult decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while they work on a solution."

"This means that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water."

Wellington Water's other fluoride facilities, based at Waterloo and Wainuiomata, remain operating.

Wellington Water Director of Regulatory Services emphasised the duty of care water suppliers have to their customers.

"It is important that we supply safe and healthy drinking water to our communities.

"Greater Wellington Regional Council has tasked us, on behalf of Metropolitan Wellington councils, to operate and maintain our Water Treatment Plants.

"This includes adding fluoride to the water supply as recommended by many national and international health bodies, including the World Health Organisation.

"We are working on ways to return fluoride to the water supply at our Te Marua and Gear Island Water Treatment Plants. We are also working on ensuring that we are able to consistently fluoridate the drinking water at all our water treatment plants in a way that provides the expected health benefit.

"Our review has provided a number of recommendations, which we are working to implement, and Greater Wellington Regional Council has funded us to carry out this work as a priority," says



### **ENDS**

#### **NOTES**

Fluoride already exists in water naturally. Wellington Water top it up to between 0.7 ppm and 1.0 ppm, with 1.0 ppm being the maximum amount. This range provides the ideal amount of fluoride for giving protection against tooth decay as outlined in the national standard and recognised by international health bodies, including the World Health Organisation.

### 1. Website copy

### Work in your area - Map marker on WTPs

We are working on a project to increase the reliability and availability of fluoride dosing at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

From: March 2022 To: July 2022

### Preview:

We are working on a project to increase the reliability and availability of fluoride dosing at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

#### **Content:**

The machinery we use to add fluoride to the water supply has been experiencing ongoing issues that has reduced the availability and reliability of fluoridation in the treated water.

As of February 2022, continued health and safety issues at Gear Island and Te Marua Water Treatment Plants have meant that we have needed to stop the fluoride dosing facilities. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

So, we have reviewed the fluoride facilities and received recommendations to achieve a higher reliability target.

We will start work on these recommendations as soon as practicable.

Updates will be available here as the project progresses.

### 2. Internal emails

### a) Email to Internal CCRs

Date: Week of Monday 7 March

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Kia ora koutou,

Wellington Water is required by its metropolitan Wellington Councils to add fluoride to drinking water, except for the Petone and Korokoro areas.

Fluoride is added at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants to achieve a level of fluoride between 0.7-1.0 g/m3. This is the recommended national standard and recognised by international health bodies, including the World Health Organisation.

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability Wellington Water commissioned a peer reviewed report, received in February 2022, that confirmed the poor state of the fluoride plants and the limited feasibility of keeping those plant running into the medium term.

The report also identified a health and safety issue at Gear Island Water Treatment Plant and a plant defect at Te Marua Water Treatment Plant.

As a result of these issues, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have stopped. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Earlier today Greater Wellington Regional Council was briefed as the owner of the metropolitan water treatment plants. They have provided assurance of funding to progress immediate repairs and are committed to a longer-term plan to upgrade the regions plants to improve reliability.

The project aims to:

- reinstate fluoride dosing to the affected areas in the short term (5-9 months),
- increase the safety and reliability of fluoride dosing at all the water treatment plants in the medium to long-term, and
- install new fluoride monitors to evaluate our dosing level throughout the network.

Our next step is to inform the public, as part of this, we are:

- Briefing the CCRs,
- Meeting the council communications teams,
- Providing an information pack, through council communications team, for council customer services teams as they will likely be the initial points of contact for customer enquiries.

- Advising Regional Public Health and the Dental Association,
- And issuing a joint GWRC and WWL media release.

Tomorrow we will share this information publicly. For this reason, I ask you to please keep this email and information confidential.

If you have any questions, or would like to discuss, please contact

Director of Regulatory Services at

Ngā mihi,

Director of Regulatory Services Wellington Water

### 3. External emails

### b) Email to Water Committee

Date: Week of Monday 14 March

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Kia ora koutou,

Wellington Water is required by its metropolitan Wellington Councils to add fluoride to drinking water, except for the Petone and Korokoro areas.

Fluoride is added at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants to achieve a level of fluoride between 0.7-1.0 g/m3. This is the recommended national standard and recognised by international health bodies, including the World Health Organisation.

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability Wellington Water commissioned a peer reviewed report, received in February 2022, that confirmed the poor state of the fluoride plants and the limited feasibility of keeping those plant running into the medium term.

The report also identified a health and safety issue at Gear Island Water Treatment Plant and a plant defect at Te Marua Water Treatment Plant.

As a result of these issues, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have stopped. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

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### The project aims to:

- reinstate fluoride dosing to the affected areas in the short term (5-9 months),
- increase the safety and reliability of fluoride dosing at all the water treatment plants in the medium to long-term, and
- install new fluoride monitors to evaluate our dosing level throughout the network.

Tomorrow we will share this information publicly. For this reason, I ask you to please keep this email and information confidential.

If you have any questions, or would like to discuss, please contact

Director of Regulatory Services at

.

Ngā mihi,

Director of Regulatory Services Wellington Water

### c) Email to council SLT

**Date: Week of Monday 14 March** 

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Kia ora koutou,

Wellington Water is required by its metropolitan Wellington Councils to add fluoride to drinking water, except for the Petone and Korokoro areas.

Fluoride is added at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants to achieve a level of fluoride between 0.7-1.0 g/m3. This is the recommended national standard and recognised by international health bodies, including the World Health Organisation.

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability Wellington Water commissioned a peer reviewed report, received in February 2022, that confirmed the poor state of the fluoride plants and the limited feasibility of keeping those plant running into the medium term.

The report also identified a health and safety issue at Gear Island Water Treatment Plant and a plant defect at Te Marua Water Treatment Plant.

As a result of these issues, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have stopped. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Earlier today Greater Wellington Regional Council was briefed as the owner of the metropolitan water treatment plants. They have provided assurance of funding to

progress immediate repairs and are committed to a longer-term plan to upgrade the regions plants to improve reliability.

The project aims to:

- reinstate fluoride dosing to the affected areas in the short term (5-9 months),
- increase the safety and reliability of fluoride dosing at all the water treatment plants in the medium to long-term, and
- install new fluoride monitors to evaluate our dosing level throughout the network.

Our next step is to inform the public, as part of this, we are:

- Briefing your CCR,
- Meeting your communications teams,
- Providing an information pack, through your communications team, for your customer services teams as they will likely be the initial points of contact for customer enquiries.
- Advising Regional Public Health and the Dental Association,
- And issuing a joint GWRC and WWL media release.

If your team has any questions please contact , our Director of Regulatory Services at .

Ngā mihi nui,



d) Email to Regional Public Health

Date: Week of Monday 14 March

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Tēnā koe,

The letter is to advise you that due to a recently identified health and safety issue at Gear Island Water Treatment Plant, and a plant defect at Te Marua Water Treatment Plant, fluoridation of the water from those Water Treatment Plants has now been stopped.

This impacts the delivery of fluoridated water to the Wellington region. The only areas that are currently receiving fluoridation within the recommended health guidelines (with some interruptions) are Wainuiomata, Lower Hutt, and Eastbourne. All other areas in metropolitan Wellington are receiving no fluoride, or not enough to have a health benefit.

As customers rely on the presence of fluoride in the water, we have advised the impacted communities to make them aware of the absence of fluoride so they can adjust their oral health regime.

Should Regional Public Health be collecting data related to the effects of fluoride in the population of metropolitan Wellington then you should treat this data with caution. The level of fluoride has often not been at the level to have a positive health benefit - more exact data can be provided should this be required.

It is expected that fluoride dosing will be restarted to Upper Hutt, Porirua, and most of Wellington City midyear and Wellington Water will confirm to the Ministry when this occurs.

Should any further information be required please feel free to contact me. Nāku noa, nā

Director of Regulatory Services Wellington Water

### e) Email to Dental Association

**Date: Week of Monday 14 March** 

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Tēnā koe,

The letter is to advise you that due to a recently identified health and safety issue at Gear Island Water Treatment Plant, and a plant defect at Te Marua Water Treatment Plant, fluoridation of the water from those Water Treatment Plants has now been stopped.

This impacts the delivery of fluoridated water to the Wellington region. The only areas that are currently receiving fluoridation within the recommended health guidelines (with some interruptions) are Wainuiomata, Lower Hutt, and Eastbourne. All other areas in metropolitan Wellington are receiving no fluoride, or not enough to have a health benefit.

As customers rely on the presence of fluoride in the water, we will be advising the impacted communities tomorrow morning of the absence of fluoride so they can adjust their oral health regime.

We're asking the New Zealand Dental Association to be the spokesperson for advice on the public's oral health regime.

It is expected that fluoride dosing will be restarted to Upper Hutt, Porirua, and most of Wellington City in the next 6-9 months and Wellington Water will confirm when this occurs.

Should any further information be required please feel free to contact me.

Nāku noa, nā

### 4. FAQs

# Why have the fluoride dosing systems at Te Marua and Gear Island Water Treatment plants been stopped?

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability, Wellington Water commissioned a review, received in February 2022, that confirmed the fluoride facilities are not operating as they should.

The review also identified operational health and safety risks at the Te Marua and Gear Island Water Treatment plants. Because of this, we made the difficult decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while we work on a solution.

This means that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Wellington Water's other fluoride facilities, based at Waterloo and Wainuiomata, remain operating, which means Wainuiomata, Lower Hutt and Eastbourne are still receiving some levels of fluoride in their water.

### Is this a new issue, and if not, how long has Wellington Water known?

The fluoride dosing facilities at the water treatment plants have been operating inconsistently for around four years.

Due to the health risks posed by high levels of fluoride dosing our operators have been conservative with dosage. This ensures that the upper level is not exceeded but has generated periods where dosage has fallen below the effective range.

### Why didn't you deal with it sooner?

We have been monitoring and nursing the fluoride facilities at our treatment plant for a number of years now but more recently, the issues with the facilities have become too onerous.

We understand that this situation is not ideal, which is why in February 2022 we commissioned a review to confirm that the fluoride facilities have not been operating as they should and to provide us with recommendation on the best way to consistently fluoridate the drinking water at all our water treatment plants in a way that provides the expected health benefit.

We are working on implementing these recommendations now and Greater Wellington Regional Council has funded us to carry out this work as a priority.

# What are other issues are you facing with fluoride facilities at your other water treatment plants?

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

When were you last fluoridating the drinking water at the right levels?

We are still working on collating the long-term data but we do know that our fluoride facilities have been operating inconsistently for around four years.

### Why have you decided to only turn off fluoride for certain suburbs/areas?

Each water treatment plant services different areas of metropolitan Wellington.

This means that the supply of fluoride depends on which plant you receive your water from.

As we have decommissioned the fluoride facilities at the Te Marua and Gear Island water treatment plants, Upper Hutt, Porirua and Wellington City are not receiving fluoridated water.

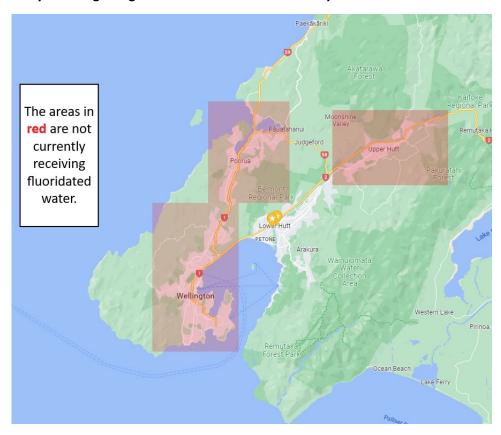
As of early March, both Waterloo and Wainuiomata are fluoride dosing, meaning that Lower Hutt (except for Petone and Korokoro) Eastbourne and Wainuiomata are currently receiving the recommended amount for protection against tooth decay.

### Are the other suburbs that are still getting fluoride getting the right levels?

Our last report for the last month shows that the Waterloo Water Treatment Plant was supplying 0.8mg/l of fluoride. The Wainuiomata Water Treatment Plant was supplying 0.79mg/l of fluoride.

This means that Lower Hutt (except for Petone and Korokoro) Eastbourne and Wainuiomata are currently receiving the recommended amount for protection against tooth decay.

### Is my suburb getting fluoride in their water currently?



\* Please note, the Petone and KoroKoro areas also do not receive fluoridated water, due to a separate council agreement.

### What areas are you dosing correctly?

As of early March, both Waterloo and Wainuiomata are fluoride dosing, meaning that Lower Hutt (except for Petone and Korokoro) Eastbourne and Wainuiomata are currently receiving the recommended amount for protection against tooth decay.

### Why have you not been dosing correctly?

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the health risks posed by high levels of fluoride dosing our operators have been conservative with dosage. This ensures that the upper level is not exceeded but has generated periods where dosage has fallen below the effective range.

# What advice are you giving to parents whose children have not been getting the right levels of fluoride in their water?

It's not appropriate for Wellington Water to be providing health advice but we do recommend that anyone who is concerned to either contact their dentist or Regional Public Health [to be confirmed by RPH]

### Has the removal of fluoride had any dental health ramifications?

It's not appropriate for Wellington Water to be providing health advice but we do recommend that anyone who is concerned to either contact their dentist or Regional Public Health [to be confirmed by RPH]

### How much will it cost to repair the plants?

Due to the early stage of the project, supply challenges and Covid-19, we are still working on confirming a cost for this work.

### Why does Greater Wellington have to pay for the upgrade?

Greater Wellington Regional Council own the Wellington metropolitan water treatment plants and task us on behalf of other councils, to operate and maintain these facilities.

### How long will it take to repair the plants?

We are estimating that it will take 6-9 months to repair the equipment at the Te Marua Water Treatment Plant. This will return fluoride to Upper Hutt, Porirua and Wellington City.

We are still evaluating what is required at Gear Island Water Treatment Plant.

### Why are you fluoridating the drinking water?

In November 2021, the Health (Fluoridation of Drinking Water) Amendment Bill passed through the Health Committee in Parliament.

This means that water suppliers are now required to fluoridate a water supply if directed to do so by the Director-General of Health. Those already fluoridating the water supply will be required to continue.

Our metropolitan Wellington Water Treatment Plants already have fluoridation facilities, but they are aging and are not very reliable.

The introduction of the Health (Fluoridation of Drinking Water) Amendment Bill has placed more emphasis on the consistent operation of these fluoride dosing facilities.

### What is water fluoridation?

Fluoride already exists in water. Water fluoridation is when the natural level of fluoride in the water supply is topped up to between 0.7 ppm and 1.0 ppm. This is the ideal amount for giving protection against tooth decay. This is recommended by many national and international health bodies, including the World Health OrganiSation.

The Ministry of Health recommends water fluoridation as a safe and effective way to prevent and reduce tooth decay for everyone. The levels of fluoride in water are carefully monitored.

#### Is fluoride in water safe?

The role of fluoride in water has been examined around the world – including in New Zealand – over the last 60 years. There is strong evidence that there are no adverse effects of any significance from fluoridation at the levels used in New Zealand, and that it is beneficial to New Zealanders of all ages. This is especially true for our most vulnerable communities.

### Is it effective?

Fluoride in water neutralises the effect of acids that cause decay on teeth and helps to repair damage before it becomes permanent.

The most recent New Zealand Oral Health Survey (2009) shows that children and adolescents have 40 percent less tooth decay over their lifetime if they live in areas with fluoridated water.

The government estimates that introducing community water fluoridation to all public drinking water supplies would result in net savings of more than \$600 million over 20 years - mostly to consumers, and some to government?

### Why isn't fluoride added to the Petone/Korokoro water supply?

There was a consultation in Petone in 1999 which resulted in 70% of those polled (30% of households) saying they did not want fluoridation.

### What is the Health (Fluoridation of Drinking Water) Amendment Bill?

The new legislation allows the Director-General of Health to make decisions about fluoridating public water supplies.

It requires the Director-General of Health to consider the scientific evidence of the effectiveness of fluoridation in reducing dental decay, and whether the benefits outweigh the financial costs. They must consider the oral health status (or likely oral health status) of the local community, the size of the water supply and how much it's likely to cost to introduce fluoridation.

The new legislation does not require local authorities to consult with their communities on decisions around fluoridating their water supplies.

Local authorities that are currently fluoridating drinking water supplies must continue to do so.

It is expected that implementation will be phased over time, from mid-2022.

In instances of non-compliance, the Director-General of Health may take action to hold local authorities to account.

From:

\* All Staff

Subject: Heads up of public announcement tomorrow Date: Tuesday, 15 March 2022 8:28:00 pm

Attachments: <u>image001.png</u>

Kia ora koutou.

This is a heads up to let you know that tomorrow from 9.30am, we'll be publicly announcing the findings from a recent review into our fluoride dosing facilities. We'll be publishing a joint media release with our client council, Greater Wellington Regional Council, who own the water treatment facilities in the Wellington metropolitan area.

We recently commissioned a review of our fluoride facilities as they are over 30 years old and have become increasingly inconsistent in their ability to dose correctly. This has resulted in an inconsistent and low level of fluoridation in our water.

We got the results back from the review last month, and the report confirmed the fluoride equipment at our plants are not operating as they should. The review also identified some operational health and safety issues at the Gear Island Water and Te Marua Water Treatment Plants.

As a result, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have been stopped. This means that Upper Hutt, Porirua and parts of Wellington City are no longer receiving fluorinated water.

, our Director for Regulatory Services is our spokesperson for this work and will be talking about this at tomorrow's SLT Connect. Feel free to join us for tomorrow's session and can answer any questions you may have.

If you receive any questions from media or the wider public, please direct them to my team by emailing us on <a href="media@wellingtonwater.co.nz">media@wellingtonwater.co.nz</a>

Ngā mihi



### Communications and Community Engagement Manager



Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz

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From:
To:

Cc:
Subject: RE: Fluoride comms

Date: Tuesday, 15 March 2022 7:55:00 pm

Attachments: image001.png

Kia ora koutou

Here's the final media release which has been approved by and and . We will be issuing this at 9.30am tomorrow.

has asked me to send a note out to all staff to give people a heads up that we'll be making the below announcement and to encourage people to attend the SLT connect tomorrow if they have any questions. I'll do this now.

Cheers,



### MEDIA RELEASE

Wellington's drinking water fluoridation facilities are aging and in need of repair Embargoed until 9.30am, Wednesday 16 March 2021

Wellington Water is working quickly to repair equipment that fluoridates the regional drinking water supply, which a recent review found has not been delivering fluoridated water to specification.

The Greater Wellington Regional Council Fluoride Facilities Review was commissioned by Wellington Water and received in February 2022 confirming Wellington Water's analysis of the failing performance of the decades-old fluoridation system. Wellington Water operates the water treatment plants on behalf of Greater Wellington and delivers the bulk drinking water supply to Lower Hutt, Upper Hutt, Porirua and Wellington cities.

"Our fluoridation machinery is over 30 years old and no longer meets acceptable performance standards," says Greater Wellington Regional Council Chief Executive . "The outcome of which is a low and inconsistent level of fluoridation in our water but it's also an opportunity to invest in an upgraded system.

"The review also identified some operational health and safety risks at the Te Marua and Gear Island Water Treatment plants. Because of this, Wellington Water made the decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while they work on reinstating service.

"This means that Upper Hutt, Porirua and Wellington City have not been receiving fluoridated water since last month, but we'll resume it as soon as we can." Wellington Water's other fluoride facilities, based at the Waterloo and Wainuiomata water treatment plants, remain operating.

Wellington Water Director of Regulatory Services emphasised the duty of care water suppliers have to their customers.

"It is important that we supply safe and healthy drinking water to our communities.

"Greater Wellington Regional Council has tasked us, on behalf of the metropolitan

Wellington councils, to operate and maintain our Water Treatment Plants.

"This includes adding fluoride to the water supply as recommended by many national and international health bodies, including the World Health Organisation.

"We are working on ways to return fluoride to the water supply at our Te Marua and Gear Island Water Treatment Plants. We are also working on ensuring that we are able to consistently fluoridate the drinking water at all our water treatment plants in a way that provides the expected health benefit.

"Our review has provided a number of recommendations, which we are working to implement, and Greater Wellington Regional Council has funded us to carry out this work as a priority," says

It is expected that it will take 6-9 months to repair the equipment at the Te Marua Water Treatment Plant. This will return fluoride to Upper Hutt, Porirua and Wellington City.

Wellington Water is still evaluating what is required at Gear Island Water Treatment Plant.

**ENDS** 

Communications and Community Engagement Manager	
Private Bag 39804, Wellington Mail Centre 5045	
Level 4, 25 Victoria Street, Petone, Lower Hutt	
www.wellingtonwater.co.nz	
From: Sent: Monday, 14 March 2022 9:46 pm	
То:	

Cc:	
<b>Subject:</b> Fluoride comms	

This is just a guick update on where we are at for fluoride comms.

Kia ora koutou

and I met with GWRC's comms manager today and we have agreed to issue a joint statement on Wednesday morning to announce our decision to stop fluoride dosing at Te Marua and Gear Island.

As discussed at SLT last week, we have started the process of working through the steps to notify our councils ahead of Wednesday's announcement.

Tomorrow will be a key day for us, and has already set up a time for you all and the CCRs at noon tomorrow to let them know about this issue. is also presenting to GWRC (officers and councillors) tomorrow morning to let them know and to outline our comms approach.

We will ensure that all our council comms teams and their customer hubs have a copy of the comms pack including Q&As to help the answer any questions they may get from the public. We will work with GWRC to lead any media enquiries. will be our spokesperson.

Below is the roll out schedule for in the lead up for Wednesday. Attached are our high level key messages that we will use to base our media release and external comms on.

Any questions, let me or know.

	Roll out schedule				
Date	Time	Activity	Responsibility	Status	
Mon 14	N/A	Council CEOs heads up		Completed	
Mar		Water Committee Chair heads			
		up			
Mon 14	1.30pm	Agree comms approach with		Completed	
Mar		GWRC comms			
Tues 15	9.00am	Heads up to WCC, PCC, HCC,			
Mar		UHCC comms			
Tues 15	9.30am	Briefing to GWRC	+ SLT		
Mar					
Tues 15	12.00pm	Briefing to WCC, PCC, HCC,	+ SLT		
Mar		UHCC CCRs			
Tues 15	12.00pm	Email to council CEs and Water			
Mar		Committee Chair			
Tues 15	1.00pm	Send comms pack to all council			
Mar		comms teams and their			
		customer hubs			
				1	

Tues 15	1.00pm	Update to RPH on status of	
Mar		WTPs and the project	
Tues 15	2.00pm	Notify New Zealand Dental	
Mar		Association and provide them	
		with comms pack	
Wed 15	8.30am	Internal email to let our people	
Mar		know	
Wed 15	9.00am	Issue joint media release	
Mar	2		
Wed 15	10.00am	Update website	
Mar		500	
Wed 15	N/A	Work with and GWRC	
Mar		to respond to media enquiries	
		as needed	

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# Communications and Community Engagement Manager



Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz



From: To: RE: Updated release Subject: Date: Tuesday, 15 March 2022 4:57:14 pm Attachments: image001.png image005.png image007.png Updated fluoride Media Release re NC comment1503.docx Bingo. loves the release. Thanks for your patience! Your version may differ slightly. Cheers makaurangi Kaiwhakatauira whakanikoniko | Senior Media Advisor – Customer Engagement ? Greater Wellington Te Pane Matua Taiao 100 Cuba St, Te Aro, Wellington 6011 Follow us online: Facebook | Twitter | gw.govt nz From: Sent: Tuesday, 15 March 2022 4:35 PM Subject: RE: Updated release Hiya, here are my changes. Some detail not quite right and I'm wondering if we'll get ourselves unstuck if we focus on the minor detail too much. Be good to get your thoughts. Cheers, **Communications and Community Engagement Manager** Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt www.wellingtonwater.co.nz

From:

**Sent:** Tuesday, 15 March 2022 4:22 pm

To:

Subject: Updated release

What do you think – last chance before I send it off to him. Have we got it? Cheers





Kaiwhakatauira whakanikoniko | Senior Media Advisor – Customer Engagement Greater Wellington Te Pane Matua Taiao

100 Cuba St, Te Aro, Wellington 6011

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# Response to LGOIMA requests for communications plan for March 16 fluoride media release.

Requests: OIA IRO - 237 and OIA IRO 226

Response for OIA IRO – 237, NZ Herald

The communications plan behind the press release that was issued on March 16 saying "Wellington Water is working quickly to repair equipment that fluoridates the regional drinking water supply, which a recent review found has not been delivering fluoridated water to specification".

Please see attached for the communications plan which informed and outlines the communications approach Wellington Water took to inform councils, stakeholders, and the public of fluoridation being stopped at the Te Marua and Gear Island Water Treatment Plants.

To do this we made a joint public announcement between Wellington Water and the Greater Regional Wellington Council on 16 March 2022 via a media release.

The attached communications plan, its approach and high-level messaging was proposed, discussed and approved by the CE and Senior Leadership Team (SLT) on 10 March 2022. This is noted on the minutes from the meeting, which are also attached.

A more detailed timeline of communications activities and key messages was also supplied to the CE and SLT by the Communications and Community Engagement Manager on 14 March 2022 via email, which is attached.

In the lead up to the issuing of the media release on 16 March, the final version of the media release was approved in writing by the Director Regulatory Services, who was the SLT lead for the work and the Wellington Water spokesperson for the announcement, and the CE of the Greater Wellington Regional Council as the media release was a joint release between the two organisations.

The final media release was sent to the CE and SLT on 15 March 2022. The relevant correspondence for these events is also attached.

Response for OIA IRO 226, Te Rito Journalism

Any information about how the decision was made on when to tell the public about turning off the fluoride and what to tell them, how this decision aligns with Wellington Water's Communications Strategy, and whether this decision was approved by

Please see attached for the communications plan which informed and outlines the communication approach Wellington Water took to inform councils, stakeholders, and the public of fluoridation being stopped at the Te Marua and Gear Island Water Treatment Plants.

To do this we made a joint public announcement between Wellington Water and the Greater Regional Wellington Council on 16 March 2022 via a media release.

It is important to note that the role of the Communications function at Wellington Water is to provide senior leaders with advice on communications approach and messaging. This is provided for feedback and approval by the relevant senior leader(s) once they are happy.

In the case of fluoride, the overarching decision on how and what to communicate sat with the CE and Senior Leadership Team (SLT). The SLT lead and spokesperson for the announcement was the Director Regulatory Services who provided information, feedback and guidance to the Communications Team in the lead up to the announcement.

The attached communications plan, its approach and high-level messaging was proposed, discussed and approved by the CE and Senior Leadership Team (SLT) on 10 March 2022. This is noted on the minutes from the meeting, which are also attached.

Following on from the CE and SLT decision, a more detailed timeline of communications activities and key messages was also supplied to the CE and SLT by the Communications and Community Engagement Manager on 14 March 2022 via email, which is attached.

In the lead up to the issuing of the media release on 16 March, the final version of the media release was approved in writing by the Director Regulatory Services, and the CE of the Greater Wellington Regional Council as the media release was a joint release between the two organisations.

The final media release was sent to the CE and SLT on 15 March 2022. The relevant correspondence for these events are also attached.

# **SLT Meeting 10 March 2022**

## **DRAFT Minutes**

### 1. Opening Karakia

### 2. Health & Safety Moment

### Omāroro Fatality

Discussed the people side of things. Agreed to follow through with HEB/Rees whānau to decide on how we honour the legacy of the individual concerned.

Then discussed the process. Agreed:

- 1) To converse with Worksafe over the process we are following and seek if possible confirmation
- 2) To layout the investigation process across all 5 PCBU's involved. The key is to complete a professional review, determine the lesson's learned and make the improvements. Peer review of this will ensure we are confident.
- 3) We now need a Board paper to give the Board assurance that the process we are following is robust and professional once submitted.. Once received can be passed to councils and Water Committee.

### Omicron

Thank you for the table which updates us on the Omicron risk to the business gong forward. We agreed to send this to CCRs/ CE's; Board/Water Committee.

The Omicron team meet 2x per week to review the situation which is likely to deteriorate based on general NZ exposure. Were assured key Opex GM's that we are over the issues and there is no current risk to business.

We suggested a series of scenarios be undertaken to stress test our response to worst case scenarios.

### 3. Review of our approaches to Councils

We reflected on the discussion we had 2 weeks ago about our councils and the approach we wanted to take with them. Our final product includes:

- a) Be more documented, less informal;
- b) Be better planned especially around assumed risk
- c) Be satisfied to hold the line on what is reasonable, don't over please or placate

- d) Maintain the regional model as much as we can
- e) We're funded to do core business. Water reform is determined by our owners
- f) Play the structure not the people, and
- g) Practice over communication!

Let's take these principles out to GLT, stress test there, and then bring them back to SLT to close out.

#### 4. Water Reform

Three aspects:

### a) Governance Review

to prepare summary for internal Comms

### b) Working Group

- Keep communicating activities
- Layout programmed going forward
- Seek to understand whey they need the data
- HR done. ICT and Data next
- Record hours to seek reimbursement of cost.

### c) <u>NTU</u>

- Note job adverts, GM's to open dialogue with any interested party so we have some sense of scale and possibility of partnership acrss all aspects.
- Keep engaging
- We will develop a risk register to document key interface threats/ opportunities share with councils.
  - Water supply
  - Over programming capex

#### 5. WWTP

### 5.1 Review and implementation plan

Draft implementation plan on the 23<sup>rd</sup> of March. Final to Steering group by end of March then circulation.

Note, a single page summary is needed for circulation to Stakeholders.

### 5.2 Contract Management

confirmed in role. Key to get feel for the Health of the Contract and be clear about RMA issues, renewals and key risks. UV plants and driers.

### 5.3 Resourcing

Let's see the final resourcing plans.

### 6. Opex

### 6.1 21/22 Forecasts and next 2 years

Complete same deck pack as for WCC but fit for purpose for all councils.

Due end of March.

### 6.2 Operating Model

**Key Outputs** 

Full documented Opex approach to 22/23 completed before year starts. Address all risks with councils prior to 30 June 2022 Then develop a monthly/quarterly reporting tool which facilitates conversations with councils needed to keep with budgets. Let's see final scope back in 3 weeks.

Welcome

### 7. Year 2 and 3 Capex

Good stuff. Plenty of good comms material in here.

Noted the 150% over allocation.

Agreed to pick up a further allocation with the NTU as an opportunity.

Agreed to receive an update on the investment plan at the next SLT meeting. Need to get everything aligned so we have a clear run for the next 2 years.

### 8. People

Agreed to free up from the day to day as a priority. GM's to help full the gaps as necessary.

We then need to see active management of the leadership and engagement activities in readiness for Water Reform.

### Revised paper for the offsite please.

### 9. Comms

People OK with progress on the 4 key issues. Agreed to use the SLT Connect for engagement with the team.

Keep focused on Omicron, WWTP review and Regulation with Opex and Fiscal Stimulus in our minds eye.

### 10. Fluoride

Agreed on the plan. To be proceeded with full engagement with the GWRC before rollout

PS. Extra slot provided by GWRC for 15th.

### 11. Business Planning

Agreed to focus on a full day of work on this on the 6<sup>th</sup> of April. SLT offsite, business planning and the 22/23 Company budget.

### 12. Accommodation

Agreed with the NDD occupation of Level 5. Need new plans for how to expand our Level 6/ Level 4.

### Paper Please

### 13. Fiscal Stimulus

Agreed with the direction of the plan. Please ensure all risks are covered into the Opex operating model.

Close out VHCA carefully.

### 14. General Business

to lay out memo regarding expanding size of his role.

#### 15. Remuneration

Agreed across the board uplift below T2 and excluding front line staff who are eligible for the \$s uplift over 2 years. Ensure all adjustments go together.

### 16. Key Messages

### Omāroro

SLT talked about the tragic incident at our Omāroro site last week. They discussed the importance of supporting the people who have been affected by the event – the family of the man who passed away, workers on the site, and HEB. The Omāroro site has been blessed and HEB has support in place on-site for those impacted. SLT also discussed our upcoming investigation into the incident.

### **Omicron**

SLT and the H&S team talked about our response to Omicron and how our workforce is faring now that there is a high number of COVID-19 cases in the community. We're starting to see a number of cases within our whānau and we are monitoring how that will impact our work. We have a good supply of RATs which we are using to help manage COVID-19 on the front line and in our Head Office. We have also offered RATs to our contractor whānau.

### OPEX

In our quarterly review, SLT identified five areas that they would focus on in each meeting until they are no longer relevant. OPEX is one of these five areas. SLT discussed our OPEX budget, the challenges we are facing and how we communicate our position to councils. We are in the process of talking to councils about our OPEX budget and what it will mean for them in terms of the work we deliver. Over the next few weeks, we will be working to put together an informative, consistent way for councils to receive regular updates on how we are tracking so that they have a good understanding of our OPEX costs. This works into the business planning and budgeting project that is currently underway.

Other items of interest that will need to be communicated at a later date:

- WWTP Implementation
- Fluoride
- Stimulus funding

## 17. Closing Karakia – , thanks.

From:

To: WTPFluorideDosingNotification;
Cc: \* All Bulk Water Plant Operations

**Subject:** RE: Te Marua WTP fluoride dosing system off (update)

**Date:** Tuesday, 25 May 2021 4:48:02 pm

Hello, please note that the fluoride dosing system at Te Marua WTP will stay off until we are able to the determine a plan of actions that will reduce the current dosing risks (not addressing these risks could result in a fluoride dose above the DWSNZ MAV).



**Monday/Tuesday/Wednesday** (working remotely which includes from home and possible travel to Treatment Plants in Wellington and Southern Wairarapa)

My standard working hours are 8:00am-5:00pm

From:

**Sent:** Monday, 24 May 2021 4:13 pm

**To:** WTPFluorideDosingNotification <WTPFluorideDosingNotification@wellingtonwater.co.nz>

Cc: \* All Bulk Water Plant Operations < All Plant Operations @ wellington water.co.nz >

Subject: Te marua WTP

Please be advised that fluoride dosing at Te Marua has been turned off due to a dosing issue.

Regards

**Senior Operations Technician** 



Private Bag 39804, Wellington Mail Centre 5045 Level 4, IBM House, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz

From: To: Cc: Subject: As discussed - communications and customer service materials Date: Tuesday, 15 March 2022 5:05:34 pm Attachments: image001.png Fluoride supply customer service materials (Toolkit).pdf Fluoride supply communications materials (Toolkit).pdf Kia ora, Apologises for how late these are! Attached are two documents, one for you and one for your customer services teams. Please do not distribute the communications material outside of your team until tomorrow. Please also note that the media release in the communications pack is not final and continues to be embargoed until tomorrow. We'll send you the final and let you know once it has been sent. Please let us know if you need anything else. We'll be in touch tomorrow (she/her) **Senior Communications Advisor** In the Petone Office: Monday, Wednesday and Friday Working from home: Tuesday and Thursday Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt www.wellingtonwater.co.nz

Wellington Water is owned by the Hutt, Porirua, Upper Hutt and Wellington city councils, South Wairarapa District Council and Greater Wellington Regional Council. We manage their drinking water, wastewater and stormwater services.

From:
To:

Cc:
Subject: Fluoride comms
Date: Monday, 14 March 2022 9:45:00 pm

Attachments: image001.png

Fluoride key messages.docx

### Kia ora koutou

This is just a quick update on where we are at for fluoride comms.

and I met with GWRC's comms manager today and we have agreed to issue a joint statement on Wednesday morning to announce our decision to stop fluoride dosing at Te Marua and Gear Island.

As discussed at SLT last week, we have started the process of working through the steps to notify our councils ahead of Wednesday's announcement.

Tomorrow will be a key day for us, and has already set up a time for you all and the CCRs at noon tomorrow to let them know about this issue. is also presenting to GWRC (officers and councillors) tomorrow morning to let them know and to outline our comms approach.

We will ensure that all our council comms teams and their customer hubs have a copy of the comms pack including Q&As to help the answer any questions they may get from the public. We will work with GWRC to lead any media enquiries. will be our spokesperson.

Below is the roll out schedule for in the lead up for Wednesday. Attached are our high level key messages that we will use to base our media release and external comms on.

Any questions, let me or know.

Roll out schedule				
Date	Time	Activity	Responsibility	Status
Mon 14	N/A	Council CEOs heads up		Completed
Mar		Water Committee Chair heads	14	
		up	30	
Mon 14	1.30pm	Agree comms approach with		Completed
Mar		GWRC comms		
Tues 15	9.00am	Heads up to WCC, PCC, HCC,		
Mar		UHCC comms		
Tues 15	9.30am	Briefing to GWRC		
Mar		-		
Tues 15	12.00pm	Briefing to WCC, PCC, HCC,		
Mar		UHCC CCRs	-	
Tues 15	12.00pm	Email to council CEs and Water		
Mar		Committee Chair		
Tues 15	1.00pm	Send comms pack to all council		
Mar	-	comms teams and their		

	1	customer hubs	
Tues 15	1.00pm	Update to RPH on status of	
Mar		WTPs and the project	
Tues 15	2.00pm	Notify New Zealand Dental	
Mar	NAX.	Association and provide them	
		with comms pack	
Wed 15	8.30am	Internal email to let our people	
Mar		know	
Wed 15	9.00am	Issue joint media release	
Mar			
Wed 15	10.00am	Update website	
Mar		50 E	
Wed 15	N/A	Work with and GWRC	
Mar		to respond to media enquiries	<u> </u>
		as needed	

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# Communications and Community Engagement Manager



Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt

### www.wellingtonwater.co.nz





# Fluoride supply communications plan

Monday 21 February

# **Background**

Wellington Water operates four fluoridation facilities, located at the four water treatment plants that supply the Wellington regional water supply network. Fluoride dosing is mandated by the Wellington's city councils, with the exception of Petone, Korokoro and South Wairarapa.

The fluoridation facilities are over 30 years old and have experienced ongoing issues that have reduced the safety and reliability of fluoridation and the consistency of the treated water fluoride concentration. Due to these issues, the percentage of time that the fluoride dosing facilities have been operational is poor.

Operational statistics for January 2019 to May 2020:

Water Treatment Plant	Fraction of time fluoridation was operational
Te Marua	10-20%
Waterloo	30-40%
Wainuiomata	10-20%
Gear Island*	55%

<sup>\*</sup>Since 1999 the Gear Island WTP has only been used as a standby facility and is typically only run on one or two days each month, to maintain operational readiness. However, the Gear Island fluoride facility doses continuously into the Wellington water supply (to accommodate the non-fluoridated Petone supply zone).

The poor reliability illustrated above is exacerbated by the fact that because fluoridation is not considered a critical water safety requirement, issues are most easily dealt with by shutting down fluoridation systems, with rectification and reinstatement of fluoride dosing taking a lower priority than other more critical tasks.

As of February 2020, both Te Marua and Gear Island Water Treatment Plants have stopped dosing fluoride, due to ongoing health and safety issues with the treatment plants.

This information has not been communicated to our client councils.

To rectify this, Wellington Water has started a two-phase project to improve the current poor performance and safety of the current fluoride dosing systems to meet the requirements of the Health (Fluoridation of Drinking Water) Amendment Bill and upgrade, medium to long-term, the fluoride dosing systems at each plant to comply with the Water New Zealand code of practice.

In addition, the Health (Fluoridation of Drinking Water) Amendment Bill passed through the Health Committee in Parliament in November 2021.

Water suppliers are now required to fluoridate a water supply if directed to do so by the Director-General of Health. Those already fluoridating will be required to continue to do so unless directed by the Director-General of Health to stop.

This is likely to place more emphasis on reliability of fluoride dosing.

# **Objectives**

- Rebuild the trust and confidence of our client councils and stakeholders in Wellington Water's drinking water systems and procedures.
- To inform our key stakeholders of the current condition of the fluoride dosing at the Water
   Treatment Plants and the work Wellington Water is doing to mitigate these issues.
- To inform the public of the current condition of the fluoride dosing at the Water Treatment Plants and the work Wellington Water is doing to mitigate these issues.
- Partners (iwi, councils, GWRC) have the information they need to answer questions from their audiences.
- Key stakeholders, partners and the community are well-informed about the work Wellington
   Water is doing to improve drinking water operations.

# Strategic approach

The communications approach for this project is dependent on which phase the project is in.

1. The aim of the first phase of the project is to improve the current poor reliability and performance of the current fluoride dosing systems to meet the requirements of the Health (Fluoridation of Drinking Water) Amendment Bill.

The communications team have developed a detailed stakeholder engagement and communications plan to inform key stakeholders of poor reliability issues at the same time as advising them of the short-term work Wellington Water is doing to mitigate these issues.

The communications approach for this stage of the project will be primarily stakeholder focussed. It is important that we inform them of poor reliability issues, and the dosing facilities shut down, at the same time as advising them of the short-term work Wellington Water is doing to mitigate these issues.

Externally there will be a project webpage, a media release, and we will be actively promoting the issues and work we're doing on social media.

2. The aim of the second phase of the project is to upgrade the fluoride dosing systems at each plant to comply with the Water New Zealand code of practice.

This includes an option assessment of the dosing systems for medium-term and long-term solutions to increase the reliability of the fluoride dosing to the network. Including estimated costs for each option – for each plant.

The communications team will keep key stakeholders engaged of the work and implement some 'light touch' external communications.

- 3. The aim of phase three and four is to:
  - a. carry out a detailed design for the preferred option for each plant,
  - b. provide upgraded cost assessment,

c. construct and commission the designed dosing systems in accordance with the gateway process

This communications plan outlines our communication approach and activities for the first two phases of the Fluoride Supply Project. Further communications will be required for phases three and four, including a detailed stakeholder management and risk mitigation plan.

If Petone and SWDC are included in phases three and four, future communications activities and risk registers will need to reflect this.

## **Key messaging**

The below key messages can be used on their own or in conjunction with the overarching story, depending on the audience or channel we're using.

### Overarching key messages:

- We add fluoride to our drinking water at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.
- The machinery we use to fluoridate water is over 30 years old and not operating as it should.
- This has resulted in an inconsistent and low level of fluoridation in our water.
- In February, we commissioned Stantec to undertake a review of our fluoridation facilities at our Wellington's metropolitan drinking water treatment plants, which confirmed that our equipment was not working correctly.
- Fluoridation of water needs to be provided at certain levels to be effective. As the equipment used to gauge the levels of fluoride dosing has been providing lower than required doses, we made the difficult decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while we work on a solution.
- This means that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.
- It is important that we supply safe and healthy drinking water to our communities and these issues mean we are unable to continue to fluoridate the drinking water in a way that provides the expected health benefit.
- As part of the review, Stantec provided us with some short-term recommendations to return fluoride to the water supply as soon as possible.
- We will start work on these recommendations as soon as practicable with an additional project to increase the reliability of our fluoride dosing systems in the medium to long-term running at the same time.
- Greater Wellington Regional Council has funded us to carry out this work as a priority.

### The project/s:

- We are installing more fluoride monitors to evaluate our dosing levels.
- We have commissioned Stantec to review the fluoride facilities and they have provided recommendations to make the plants more reliable.
- We will start work on these recommendations as soon as practicable.

 Alongside our work on the current fluoride dosing systems, Wellington Water is working on a wider project to increase the reliability of our fluoride dosing systems in the medium to long-term.

### Background:

- The Te Marua Water Treatment Plant supplies Upper Hutt, Porirua and the northern and western Wellington suburbs, and the Waterloo, Gear Island and Wainuiomata Water Treatment Plants supply Wainuiomata, Lower Hutt, and Wellington.
- We add fluoride to our drinking water at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

### The amendment bill:

- In November 2021, the Health (Fluoridation of Drinking Water) Amendment Bill passed through the Health Committee in Parliament.
- This means that water suppliers are now required to fluoridate a water supply if directed to
  do so by the Director-General of Health. Those already fluoridating the water supply will be
  required to continue.
- This has placed more emphasis on the consistent operation of the fluoride dosing facilities.
- It is expected that implementation will be phased over time, from mid-2022.

# **Spokespeople**

Wellington Water

## Audiences

Audience	What do we want them to know / do / understand	Channels to reach them
Our client council relationship (CCR) managers	Be familiar with the fluoride dosing issues at the Water Treatment Plants.      Understand our approach to mitigation (when it is available).      Use our key approved messaging.      Support our communications approach including working with the communications team to tailor consistent communication to our key	<ul> <li>Regular updates from the project manager to CCRs via email or in meetings</li> <li>Have the project team directly engage with CCRs prior to their regular meetings with their councils to ensure that they are across the latest progress.</li> <li>Or invite the project manager to the CCR/council meetings so councils can ask questions of the lead directly.</li> </ul>

SLT .	within Council.  Be familiar with the	
SLT	<ul> <li>Re familiar with the</li> </ul>	
	fluoride dosing issues at the Water Treatment Plants.  Understand our approach to mitigation (when it is available).  Use our key approved messaging.  Support us to maintain confidence with the Board, the Water Committee, Mayors and Councillors by being advocates  Staying consistent with messaging during their interactions with these key stakeholders.	<ul> <li>Respective SLT meetings, project manager could attend SLT meetings periodically to provide an update on progress.</li> <li>Clear guidance from the project manager on what's needed from SLT to support the project</li> </ul>
Wellington Water Board	<ul><li>stakeholders.</li><li>Be familiar with the</li></ul>	a I I walata ta Dagual ay
	fluoride dosing issues at the Water Treatment Plants.  Understand our approach to mitigation (when it is available).  Board Chair to directly engage with Water Committee Chair on our progress.  Support us to maintain confidence with the Water Committee, Mayors and Councillors by being advocates  Staying consistent with messaging during their interactions with these key stakeholders.	<ul> <li>Update to Board on approach and progress via monthly Board meetings.</li> <li>Provide the Board with key messages on progress so they can be consistent.</li> <li>is the board conduit for the Fluoride issues.</li> </ul>
The Customer Service Team	<ul> <li>Use our key messaging while communicating with external stakeholders.</li> </ul>	Regular meeting with comms

	Sal NEWSCHOOL CONTRACTOR	1
	Support our communications approach	
	10.7	
	and help us to reach the	
	right audiences with our	
	messaging.	
Wellington Water staff,	Be aware of the project.	SLT connect
contractors, and suppliers	Be ready to engage and	On Tap
	support if needed.	Our website
	External	No. of the last of
Our client councils (GWRC,	That we are working on a	CCR meetings
HCC, UPCC, PCC and WCC) -	short-term project to	• Email
SLT, officers and elected	make our fluoride dosing	Toolkit
members.	systems more reliable.	<ul> <li>Updates from Wellington</li> </ul>
	That the fluoridation	Water CE
	facilities have all	
	experienced ongoing	
	issues that have reduced	
	the availability and	
	reliability of fluoridation.	
	That Wellington Water is	
	working on a wider project	
	to increase the reliability	
	of our fluoride dosing	
	systems in the medium to	
	long term.	
	We will provide regular	
	updates on our progress.	
Our client council comms and	Use our key messaging	We will keep our client
customer service teams	while communicating with	council comms teams in
	external stakeholders.	the loop (as per our usual
	Support our	process) on any messaging
	communications approach	and media queries.
	and help us to reach the	We will supply a toolkit of
	right audiences with our	key messaging and FAQs
	messaging.	to our CC customer
		services teams.
МОН	Use our key messaging	Regular updates to
	while communicating with	(leads the MOH
	external stakeholders.	relationship with Comms
	Support our	guidance)
	communications approach	
	and help us to reach the	
	CONTRACTOR CONTRACTOR AND	

	right audiences with our	
	messaging.	
Water Committee	<ul> <li>That the fluoridation facilities have all experienced ongoing issues that have reduced the availability and reliability of fluoridation.</li> <li>That we are working on a short-term project to make our fluoride dosing systems more reliable.</li> <li>That Wellington Water is working on a wider project to increase the reliability of our fluoride dosing systems in the medium to long term</li> </ul>	Water Committee     meetings     Updates from WW CE
Media	<ul> <li>Inat the fluoridation facilities have all experienced ongoing issues that have reduced the availability and reliability of fluoridation.</li> <li>That Wellington Water is working on a project to increase the reliability of our fluoride dosing systems.</li> </ul>	Media release
Our customers / residents / Wellington public	<ul> <li>That the fluoridation facilities have all experienced ongoing issues that have reduced the availability and reliability of fluoridation.</li> <li>That Wellington Water is working on a project to increase the reliability of our fluoride dosing systems.</li> </ul>	Website/Social Media
Dental association	That the fluoridation facilities have all experienced ongoing	Email the Dental     Association with     information about the

issues that have reduced	issues with the plants and
the availability and	a request to pass onto
reliability of fluoridation.	their patients.
That Wellington Water is	951
working on a project to	
increase the reliability of	
our fluoride dosing	
systems.	

# Risks and mitigation

Risks	Mitigation
Reputational damage	Have a clear and concise communications rollout with
	tight messaging and timelines.
Key internal stakeholders (Client	Have clear communications plan and FAQs available
councils) have not been made aware of	prior to releasing any information about fluoride.
the inconsistent fluoride dosing at the	
WTPs.	Have clear information released to our key
	stakeholders, affected parties and the public as
	appropriate.
Wellington Water needs to be prepared	Have proactive information on the project available to
that information, regarding the	reference on the website.
inconsistent fluoride dosing at the	
WTPs, will be shared to media.	Inform the public proactively about the issues with
	the dosing systems and about the likely impacts of un-
	fluoridated water.
	Have clear and authentic information released to our
	key stakeholders, affected parties and the public.
The public have not been receiving	Have fluoride FAQs on the website.
consistently fluoridated water.	
	Engage with the media early (if required) and have
	clear and authentic information released to our key
	stakeholders, affected parties and the public.
Director General of Health has	Have a clear plan for the redesign and replacement of
mandated fluoride dosing; however,	the fluoride dosing systems with proposed timeframes
WW is not currently meeting this	to inform the messaging.
requirement.	
Internal staff, primarily those not in the	All internal issues are referred to the Project Manager.
project but have worked on fluoride	
dosing in the past, are at conflict with	
the priority and funding this project	
now has.	

Anti-fluoride advocates use the project	Have clear communications plan and FAQs available
as a 'springboard' for their agenda.	prior to releasing any information about fluoride.
	,
	Have clear information released to our key
	stakeholders, affected parties and the public as
	appropriate.
Director General of Health has	The estimated timeframe for any decision on
mandated fluoride dosing including	mandated fluoride dosing is mid-2022.
introducing fluoride into the Petone	
water supply.	If the Director General of Health does request the
	introduction of Fluoride into the Petone water supply,
	WW will respond with a separate communications and
	engagement plan focused on communicating the
	process, implications, and reasons for it to the public.
	This will be a significant undertaking.
Director General of Health has	The estimated timeframe for any decision on
mandated fluoride dosing including	mandated fluoride dosing is mid-2022.
introducing fluoride into the SWDC	
water supply.	If the Director General of Health does request the
	introduction of Fluoride into the SWDC water supply,
	WW will respond with a separate communications and
	engagement plan focused on communicating the
	process, implications, and reasons for it to the public.
	This will be a significant undertaking.

# Measurement

We will measure the effectiveness of our communications through:

- Traffic to our webpage
- Feedback from our client council communications teams

If needed, we will adapt our approach according to what our data is telling us.



# **Tactics and timing**

Timing	Activity	Priority	Responsible	Status
Week of 21/02	Regulatory Services briefing to Board	N/A		Complete
04/03/2022	Messaging and situation report provided to Board.	N/A		Complete
02/02/2022	MILESTONE: Communications approach drafted and sent to PM			Complete
02/03/2022	Messaging drafted	N/A	A (A)	Complete
02/03/2022	FAQs drafted	N/A		Complete
02/03/2022	Website copy drafted	N/A		Complete
02/03/2022	Our client councils (GWRC, HCC, UPCC, PCC and WCC) – SLT, officers and elected members.     Wellington Water Board     MOH     Water Committee	N/A		Complete
07/03/2022	MILESTONE: Communications approach approved			Complete
By 09/03/2022	Customer Service Team     Client Council Comms Teams	N/A		Complete
By 09/03/2022	Story and messaging finalised	N/A		Complete
By 09/03/2022	FAQs finalised	N/A		Complete
By 09/03/2022	Webpage copy finalised	N/A		Complete

By 09/03/2022	Summary and announcement emails finalised	N/A		Complete
	<ul> <li>Our client councils (GWRC, HCC, UPCC, PCC and WCC) – SLT,</li> </ul>	240	*	
	officers and elected members.			
	Wellington Water Board			
	• MOH			
	Water Committee			
Week of 07/03	MILESTONE: Internal communications rollout begins	*	-	
Week of 07/03	Provide an overview of the fluoride issues to the board via email.	N/A		Complete
	These range from reputation, status and future timelines (when			
	we will advise councils etc.)	0		
10/03/2022	Brief SLT members of plan during an SLT meeting	N/A	Project Team	Complete
	<ul> <li>SLT item of significance including project overview and comms</li> </ul>			
	plan.			
	<ul> <li>Toolkit provided including key messaging, draft emails, FAQs and</li> </ul>			
	reactive lines			
10/03/22	to talk to (GWRC) about the issue	N/A		Complete
10/03/22	to speak to (Board) and (Committee)	N/A		Complete
14/03/22	Brief the GWRC comms team	HIGH		Complete
14/03/22	Brief the Wellington Water Customer Services team	MEDIUM		
	<ul> <li>Toolkit provided including key messaging, draft emails, FAQs and</li> </ul>			
	reactive lines			
15/03/22	MILESTONE: Content goes live			
15/03/22	Our client council comms teams	HIGH		Complete
	<ul> <li>Meeting and information pack (@1pm)</li> </ul>	9am		
	To inform the client council customer service teams		\$	

15/03/22	Workshop with GWRC led by	HIGH		Complete
		9.30am	5	
15/03/22	Our client councils (GWRC, HCC, UPCC, PCC and WCC) – SLT	HIGH		Complete
	Send email	Midday		
15/03/22	Brief our external client council relationship (CCR) managers	HIGH		Complete
	Meeting at midday	Midday		
15/03/22	Water Committee (entirety?)	HIGH		
	Send email	Midday		
15/03/22	RPH	MEDIUM		Complete
	Email update to Regional Public Health regarding the status of the	1pm		
	WTPs and the project.			
15/03/22	The New Zealand Dental Association	MEDIUM		Complete
	<ul> <li>Send email including toolkit - key messaging, FAQs, and reactive</li> </ul>	1pm		
	lines (info@nzda.org.nz )			
	<ul> <li>Ask about where people can find information on Fluoride</li> </ul>			
	additives outside of the water supply.			
16/03/22	Our customers / residents / Wellington public	HIGH		
	Website published	Morning		
	Social media posts			
16/03/22	Media	HIGH		
	<ul> <li>Joint GWRC release in appendix</li> </ul>	Morning		
18/03	MILESTONE: Water Committee Meeting			

	Ongoing	
As required	Regular updates from the project manager to CCRs via email or in meetings	
As per meeting frequency	CCR TO COUNCIL MEETINGS  Have the project team directly engage with CCRs prior to their regular meetings with their councils to ensure that they are across the latest progress or invite the project manager to the CCR/council meetings so councils can ask questions of the lead directly.	Various/
As per meeting frequency	SLT MEETINGS     Respective SLT meetings, project manager could attend SLT meetings periodically to provide an update on progress.     Clear guidance from the project manager on what's needed from SLT to support the project	Project team
As per meeting frequency	BOARD MEETINGS     Update to Board on approach and progress via monthly Board meetings.     Provide the Board with key messages on progress so they can be consistent.	/Project Manager
As per meeting frequency	WATER COMMITTEE MEETINGS     Update to committee on approach and progress via meeting.	/Project Manager



# **Appendix**

### 1. Reactive lines

Upper Hutt, Porirua and the northern and western Wellington suburbs have not been receiving Fluoride, why?

We are working on a project to increase the safety and reliability of fluoride dosing.

The machinery we use to do this, at Te Marua and Gear Island, has been experiencing ongoing issues that has reduced the safety and reliability of fluoridation in the treated water.

Because of this, we have needed to stop the fluoride dosing facilities at these plants. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

We add fluoride to our drinking water at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

### 2. Board messaging

See Fluoride update to Chair of Board.pdf

### 3. Media release

Wellington's drinking water fluoridation facilities are aging and in need of repair Embargoed until 9.30am, Wednesday 16 March 2021

Wellington Water is working quickly to repair equipment that fluoridates the regional drinking water supply, which a recent Wellington Water review found is not working consistently.

"Our fluoridation machinery is over 30 years old and not operating as it should, which has resulted in an inconsistent and low level of fluoridation in our water," says Greater Wellington Regional Council Chief Executive

"The review also identified operational health and safety risks at the Te Marua and Gear Island Water Treatment plants. Because of this, Wellington Water made the difficult decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while they work on a solution."

"This means that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water."

Wellington Water's other fluoride facilities, based at Waterloo and Wainuiomata, remain operating.

Wellington Water Director of Regulatory Services emphasised the duty of care water suppliers have to their customers.

"It is important that we supply safe and healthy drinking water to our communities.

"Greater Wellington Regional Council has tasked us, on behalf of Metropolitan Wellington councils, to operate and maintain our Water Treatment Plants.

"This includes adding fluoride to the water supply as recommended by many national and international health bodies, including the World Health Organisation.

"We are working on ways to return fluoride to the water supply at our Te Marua and Gear Island Water Treatment Plants. We are also working on ensuring that we are able to consistently fluoridate the drinking water at all our water treatment plants in a way that provides the expected health benefit.

"Our review has provided a number of recommendations, which we are working to implement, and Greater Wellington Regional Council has funded us to carry out this work as a priority," says



### **ENDS**

#### **NOTES**

Fluoride already exists in water naturally. Wellington Water top it up to between 0.7 ppm and 1.0 ppm, with 1.0 ppm being the maximum amount. This range provides the ideal amount of fluoride for giving protection against tooth decay as outlined in the national standard and recognised by international health bodies, including the World Health Organisation.

### 1. Website copy

### Work in your area - Map marker on WTPs

We are working on a project to increase the reliability and availability of fluoride dosing at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

From: March 2022 To: July 2022

### **Preview:**

We are working on a project to increase the reliability and availability of fluoride dosing at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants.

#### **Content:**

The machinery we use to add fluoride to the water supply has been experiencing ongoing issues that has reduced the availability and reliability of fluoridation in the treated water.

As of February 2022, continued health and safety issues at Gear Island and Te Marua Water Treatment Plants have meant that we have needed to stop the fluoride dosing facilities. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

So, we have reviewed the fluoride facilities and received recommendations to achieve a higher reliability target.

We will start work on these recommendations as soon as practicable.

Updates will be available here as the project progresses.

### 2. Internal emails

### a) Email to Internal CCRs

Date: Week of Monday 7 March

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Kia ora koutou,

Wellington Water is required by its metropolitan Wellington Councils to add fluoride to drinking water, except for the Petone and Korokoro areas.

Fluoride is added at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants to achieve a level of fluoride between 0.7-1.0 g/m3. This is the recommended national standard and recognised by international health bodies, including the World Health Organisation.

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability Wellington Water commissioned a peer reviewed report, received in February 2022, that confirmed the poor state of the fluoride plants and the limited feasibility of keeping those plant running into the medium term.

The report also identified a health and safety issue at Gear Island Water Treatment Plant and a plant defect at Te Marua Water Treatment Plant.

As a result of these issues, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have stopped. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Earlier today Greater Wellington Regional Council was briefed as the owner of the metropolitan water treatment plants. They have provided assurance of funding to progress immediate repairs and are committed to a longer-term plan to upgrade the regions plants to improve reliability.

The project aims to:

- reinstate fluoride dosing to the affected areas in the short term (5-9 months),
- increase the safety and reliability of fluoride dosing at all the water treatment plants in the medium to long-term, and
- install new fluoride monitors to evaluate our dosing level throughout the network.

Our next step is to inform the public, as part of this, we are:

- Briefing the CCRs,
- Meeting the council communications teams,
- Providing an information pack, through council communications team, for council customer services teams as they will likely be the initial points of contact for customer enquiries.

- Advising Regional Public Health and the Dental Association,
- And issuing a joint GWRC and WWL media release.

Tomorrow we will share this information publicly. For this reason, I ask you to please keep this email and information confidential.

If you have any questions, or would like to discuss, please contact

Director of Regulatory Services at

Ngā mihi,

Director of Regulatory Services Wellington Water

### 3. External emails

### b) Email to Water Committee

Date: Week of Monday 14 March

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Kia ora koutou,

Wellington Water is required by its metropolitan Wellington Councils to add fluoride to drinking water, except for the Petone and Korokoro areas.

Fluoride is added at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants to achieve a level of fluoride between 0.7-1.0 g/m3. This is the recommended national standard and recognised by international health bodies, including the World Health Organisation.

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability Wellington Water commissioned a peer reviewed report, received in February 2022, that confirmed the poor state of the fluoride plants and the limited feasibility of keeping those plant running into the medium term.

The report also identified a health and safety issue at Gear Island Water Treatment Plant and a plant defect at Te Marua Water Treatment Plant.

As a result of these issues, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have stopped. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Earlier today Greater Wellington Regional Council was briefed as the owner of the metropolitan water treatment plants. They have provided assurance of funding to progress immediate repairs and are committed to a longer-term plan to upgrade the regions plants to improve reliability.

### The project aims to:

- reinstate fluoride dosing to the affected areas in the short term (5-9 months),
- increase the safety and reliability of fluoride dosing at all the water treatment plants in the medium to long-term, and
- install new fluoride monitors to evaluate our dosing level throughout the network.

Tomorrow we will share this information publicly. For this reason, I ask you to please keep this email and information confidential.

If you have any questions, or would like to discuss, please contact

Director of Regulatory Services at

.

Ngā mihi,

Director of Regulatory Services Wellington Water

### c) Email to council SLT

**Date: Week of Monday 14 March** 

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Kia ora koutou,

Wellington Water is required by its metropolitan Wellington Councils to add fluoride to drinking water, except for the Petone and Korokoro areas.

Fluoride is added at the Te Marua, Waterloo, Wainuiomata and Gear Island Water Treatment Plants to achieve a level of fluoride between 0.7-1.0 g/m3. This is the recommended national standard and recognised by international health bodies, including the World Health Organisation.

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability Wellington Water commissioned a peer reviewed report, received in February 2022, that confirmed the poor state of the fluoride plants and the limited feasibility of keeping those plant running into the medium term.

The report also identified a health and safety issue at Gear Island Water Treatment Plant and a plant defect at Te Marua Water Treatment Plant.

As a result of these issues, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have stopped. The implication of this is that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Earlier today Greater Wellington Regional Council was briefed as the owner of the metropolitan water treatment plants. They have provided assurance of funding to

progress immediate repairs and are committed to a longer-term plan to upgrade the regions plants to improve reliability.

The project aims to:

- reinstate fluoride dosing to the affected areas in the short term (5-9 months),
- increase the safety and reliability of fluoride dosing at all the water treatment plants in the medium to long-term, and
- install new fluoride monitors to evaluate our dosing level throughout the network.

Our next step is to inform the public, as part of this, we are:

- Briefing your CCR,
- Meeting your communications teams,
- Providing an information pack, through your communications team, for your customer services teams as they will likely be the initial points of contact for customer enquiries.
- Advising Regional Public Health and the Dental Association,
- And issuing a joint GWRC and WWL media release.

If your team has any questions please contact , our Director of Regulatory Services at .

Ngā mihi nui,



d) Email to Regional Public Health

Date: Week of Monday 14 March

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Tēnā koe,

The letter is to advise you that due to a recently identified health and safety issue at Gear Island Water Treatment Plant, and a plant defect at Te Marua Water Treatment Plant, fluoridation of the water from those Water Treatment Plants has now been stopped.

This impacts the delivery of fluoridated water to the Wellington region. The only areas that are currently receiving fluoridation within the recommended health guidelines (with some interruptions) are Wainuiomata, Lower Hutt, and Eastbourne. All other areas in metropolitan Wellington are receiving no fluoride, or not enough to have a health benefit.

As customers rely on the presence of fluoride in the water, we have advised the impacted communities to make them aware of the absence of fluoride so they can adjust their oral health regime.

Should Regional Public Health be collecting data related to the effects of fluoride in the population of metropolitan Wellington then you should treat this data with caution. The level of fluoride has often not been at the level to have a positive health benefit - more exact data can be provided should this be required.

It is expected that fluoride dosing will be restarted to Upper Hutt, Porirua, and most of Wellington City midyear and Wellington Water will confirm to the Ministry when this occurs.

Should any further information be required please feel free to contact me. Nāku noa, nā

Director of Regulatory Services Wellington Water

#### e) Email to Dental Association

**Date: Week of Monday 14 March** 

Subject: Fluoride dosing at the Metropolitan Wellington Water Treatment Plants

Tēnā koe,

The letter is to advise you that due to a recently identified health and safety issue at Gear Island Water Treatment Plant, and a plant defect at Te Marua Water Treatment Plant, fluoridation of the water from those Water Treatment Plants has now been stopped.

This impacts the delivery of fluoridated water to the Wellington region. The only areas that are currently receiving fluoridation within the recommended health guidelines (with some interruptions) are Wainuiomata, Lower Hutt, and Eastbourne. All other areas in metropolitan Wellington are receiving no fluoride, or not enough to have a health benefit.

As customers rely on the presence of fluoride in the water, we will be advising the impacted communities tomorrow morning of the absence of fluoride so they can adjust their oral health regime.

We're asking the New Zealand Dental Association to be the spokesperson for advice on the public's oral health regime.

It is expected that fluoride dosing will be restarted to Upper Hutt, Porirua, and most of Wellington City in the next 6-9 months and Wellington Water will confirm when this occurs.

Should any further information be required please feel free to contact me.

Nāku noa, nā

#### 4. FAQs

## Why have the fluoride dosing systems at Te Marua and Gear Island Water Treatment plants been stopped?

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the increasing plant unreliability, Wellington Water commissioned a review, received in February 2022, that confirmed the fluoride facilities are not operating as they should.

The review also identified operational health and safety risks at the Te Marua and Gear Island Water Treatment plants. Because of this, we made the difficult decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while we work on a solution.

This means that Upper Hutt, Porirua and Wellington City are no longer receiving fluorinated water.

Wellington Water's other fluoride facilities, based at Waterloo and Wainuiomata, remain operating, which means Wainuiomata, Lower Hutt and Eastbourne are still receiving some levels of fluoride in their water.

#### Is this a new issue, and if not, how long has Wellington Water known?

The fluoride dosing facilities at the water treatment plants have been operating inconsistently for around four years.

Due to the health risks posed by high levels of fluoride dosing our operators have been conservative with dosage. This ensures that the upper level is not exceeded but has generated periods where dosage has fallen below the effective range.

#### Why didn't you deal with it sooner?

We have been monitoring and nursing the fluoride facilities at our treatment plant for a number of years now but more recently, the issues with the facilities have become too onerous.

We understand that this situation is not ideal, which is why in February 2022 we commissioned a review to confirm that the fluoride facilities have not been operating as they should and to provide us with recommendation on the best way to consistently fluoridate the drinking water at all our water treatment plants in a way that provides the expected health benefit.

We are working on implementing these recommendations now and Greater Wellington Regional Council has funded us to carry out this work as a priority.

# What are other issues are you facing with fluoride facilities at your other water treatment plants?

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

When were you last fluoridating the drinking water at the right levels?

We are still working on collating the long-term data but we do know that our fluoride facilities have been operating inconsistently for around four years.

#### Why have you decided to only turn off fluoride for certain suburbs/areas?

Each water treatment plant services different areas of metropolitan Wellington.

This means that the supply of fluoride depends on which plant you receive your water from.

As we have decommissioned the fluoride facilities at the Te Marua and Gear Island water treatment plants, Upper Hutt, Porirua and Wellington City are not receiving fluoridated water.

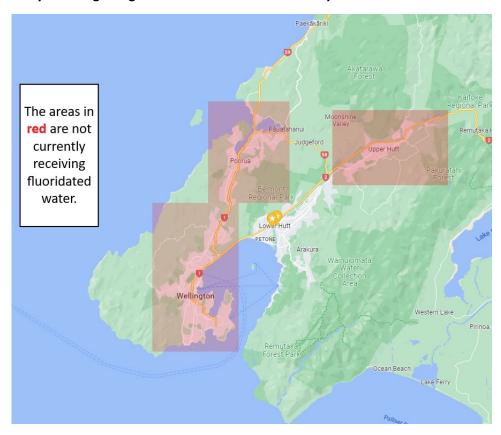
As of early March, both Waterloo and Wainuiomata are fluoride dosing, meaning that Lower Hutt (except for Petone and Korokoro) Eastbourne and Wainuiomata are currently receiving the recommended amount for protection against tooth decay.

#### Are the other suburbs that are still getting fluoride getting the right levels?

Our last report for the last month shows that the Waterloo Water Treatment Plant was supplying 0.8mg/l of fluoride. The Wainuiomata Water Treatment Plant was supplying 0.79mg/l of fluoride.

This means that Lower Hutt (except for Petone and Korokoro) Eastbourne and Wainuiomata are currently receiving the recommended amount for protection against tooth decay.

#### Is my suburb getting fluoride in their water currently?



\* Please note, the Petone and KoroKoro areas also do not receive fluoridated water, due to a separate council agreement.

#### What areas are you dosing correctly?

As of early March, both Waterloo and Wainuiomata are fluoride dosing, meaning that Lower Hutt (except for Petone and Korokoro) Eastbourne and Wainuiomata are currently receiving the recommended amount for protection against tooth decay.

#### Why have you not been dosing correctly?

The age of the fluoride dosing plants in all four of the Water Treatment Plants is approaching 30 years and the dosing facilities have become increasingly inconsistent in their ability to dose correctly.

Due to the health risks posed by high levels of fluoride dosing our operators have been conservative with dosage. This ensures that the upper level is not exceeded but has generated periods where dosage has fallen below the effective range.

## What advice are you giving to parents whose children have not been getting the right levels of fluoride in their water?

It's not appropriate for Wellington Water to be providing health advice but we do recommend that anyone who is concerned to either contact their dentist or Regional Public Health [to be confirmed by RPH]

#### Has the removal of fluoride had any dental health ramifications?

It's not appropriate for Wellington Water to be providing health advice but we do recommend that anyone who is concerned to either contact their dentist or Regional Public Health [to be confirmed by RPH]

#### How much will it cost to repair the plants?

Due to the early stage of the project, supply challenges and Covid-19, we are still working on confirming a cost for this work.

#### Why does Greater Wellington have to pay for the upgrade?

Greater Wellington Regional Council own the Wellington metropolitan water treatment plants and task us on behalf of other councils, to operate and maintain these facilities.

#### How long will it take to repair the plants?

We are estimating that it will take 6-9 months to repair the equipment at the Te Marua Water Treatment Plant. This will return fluoride to Upper Hutt, Porirua and Wellington City.

We are still evaluating what is required at Gear Island Water Treatment Plant.

#### Why are you fluoridating the drinking water?

In November 2021, the Health (Fluoridation of Drinking Water) Amendment Bill passed through the Health Committee in Parliament.

This means that water suppliers are now required to fluoridate a water supply if directed to do so by the Director-General of Health. Those already fluoridating the water supply will be required to continue.

Our metropolitan Wellington Water Treatment Plants already have fluoridation facilities, but they are aging and are not very reliable.

The introduction of the Health (Fluoridation of Drinking Water) Amendment Bill has placed more emphasis on the consistent operation of these fluoride dosing facilities.

#### What is water fluoridation?

Fluoride already exists in water. Water fluoridation is when the natural level of fluoride in the water supply is topped up to between 0.7 ppm and 1.0 ppm. This is the ideal amount for giving protection against tooth decay. This is recommended by many national and international health bodies, including the World Health OrganiSation.

The Ministry of Health recommends water fluoridation as a safe and effective way to prevent and reduce tooth decay for everyone. The levels of fluoride in water are carefully monitored.

#### Is fluoride in water safe?

The role of fluoride in water has been examined around the world – including in New Zealand – over the last 60 years. There is strong evidence that there are no adverse effects of any significance from fluoridation at the levels used in New Zealand, and that it is beneficial to New Zealanders of all ages. This is especially true for our most vulnerable communities.

#### Is it effective?

Fluoride in water neutralises the effect of acids that cause decay on teeth and helps to repair damage before it becomes permanent.

The most recent New Zealand Oral Health Survey (2009) shows that children and adolescents have 40 percent less tooth decay over their lifetime if they live in areas with fluoridated water.

The government estimates that introducing community water fluoridation to all public drinking water supplies would result in net savings of more than \$600 million over 20 years - mostly to consumers, and some to government?

#### Why isn't fluoride added to the Petone/Korokoro water supply?

There was a consultation in Petone in 1999 which resulted in 70% of those polled (30% of households) saying they did not want fluoridation.

#### What is the Health (Fluoridation of Drinking Water) Amendment Bill?

The new legislation allows the Director-General of Health to make decisions about fluoridating public water supplies.

It requires the Director-General of Health to consider the scientific evidence of the effectiveness of fluoridation in reducing dental decay, and whether the benefits outweigh the financial costs. They must consider the oral health status (or likely oral health status) of the local community, the size of the water supply and how much it's likely to cost to introduce fluoridation.

The new legislation does not require local authorities to consult with their communities on decisions around fluoridating their water supplies.

Local authorities that are currently fluoridating drinking water supplies must continue to do so.

It is expected that implementation will be phased over time, from mid-2022.

In instances of non-compliance, the Director-General of Health may take action to hold local authorities to account.

From:

To: \* All Staff

Subject: Heads up of public announcement tomorrow Date: Tuesday, 15 March 2022 8:28:00 pm

Attachments: <u>image001.png</u>

Kia ora koutou.

This is a heads up to let you know that tomorrow from 9.30am, we'll be publicly announcing the findings from a recent review into our fluoride dosing facilities. We'll be publishing a joint media release with our client council, Greater Wellington Regional Council, who own the water treatment facilities in the Wellington metropolitan area.

We recently commissioned a review of our fluoride facilities as they are over 30 years old and have become increasingly inconsistent in their ability to dose correctly. This has resulted in an inconsistent and low level of fluoridation in our water.

We got the results back from the review last month, and the report confirmed the fluoride equipment at our plants are not operating as they should. The review also identified some operational health and safety issues at the Gear Island Water and Te Marua Water Treatment Plants.

As a result, the fluoride dosing facilities at Gear Island and Te Marua Water Treatment Plants have been stopped. This means that Upper Hutt, Porirua and parts of Wellington City are no longer receiving fluorinated water.

about this at tomorrow's SLT Connect. Feel free to join us for tomorrow's session and can answer any questions you may have.

If you receive any questions from media or the wider public, please direct them to my team by emailing us on <a href="media@wellingtonwater.co.nz">media@wellingtonwater.co.nz</a>

Ngā mihi



### Communications and Community Engagement Manager



Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz

-

From:
To:

Cc:
Subject: RE: Fluoride comms

Date: Tuesday, 15 March 2022 7:55:00 pm

Attachments: image001.png

Kia ora koutou

Here's the final media release which has been approved by and and . We will be issuing this at 9.30am tomorrow.

has asked me to send a note out to all staff to give people a heads up that we'll be making the below announcement and to encourage people to attend the SLT connect tomorrow if they have any questions. I'll do this now.

Cheers,



#### MEDIA RELEASE

Wellington's drinking water fluoridation facilities are aging and in need of repair Embargoed until 9.30am, Wednesday 16 March 2021

Wellington Water is working quickly to repair equipment that fluoridates the regional drinking water supply, which a recent review found has not been delivering fluoridated water to specification.

The Greater Wellington Regional Council Fluoride Facilities Review was commissioned by Wellington Water and received in February 2022 confirming Wellington Water's analysis of the failing performance of the decades-old fluoridation system. Wellington Water operates the water treatment plants on behalf of Greater Wellington and delivers the bulk drinking water supply to Lower Hutt, Upper Hutt, Porirua and Wellington cities.

"Our fluoridation machinery is over 30 years old and no longer meets acceptable performance standards," says Greater Wellington Regional Council Chief Executive . "The outcome of which is a low and inconsistent level of fluoridation in our water but it's also an opportunity to invest in an upgraded system.

"The review also identified some operational health and safety risks at the Te Marua and Gear Island Water Treatment plants. Because of this, Wellington Water made the decision last month to turn off the fluoride facilities at Te Marua and Gear Island Water Treatment plants while they work on reinstating service.

"This means that Upper Hutt, Porirua and Wellington City have not been receiving fluoridated water since last month, but we'll resume it as soon as we can." Wellington Water's other fluoride facilities, based at the Waterloo and Wainuiomata water treatment plants, remain operating.

Wellington Water Director of Regulatory Services emphasised the duty of care water suppliers have to their customers.

"It is important that we supply safe and healthy drinking water to our communities.

"Greater Wellington Regional Council has tasked us, on behalf of the metropolitan

Wellington councils, to operate and maintain our Water Treatment Plants.

"This includes adding fluoride to the water supply as recommended by many national and international health bodies, including the World Health Organisation.

"We are working on ways to return fluoride to the water supply at our Te Marua and Gear Island Water Treatment Plants. We are also working on ensuring that we are able to consistently fluoridate the drinking water at all our water treatment plants in a way that provides the expected health benefit.

"Our review has provided a number of recommendations, which we are working to implement, and Greater Wellington Regional Council has funded us to carry out this work as a priority," says

It is expected that it will take 6-9 months to repair the equipment at the Te Marua Water Treatment Plant. This will return fluoride to Upper Hutt, Porirua and Wellington City.

Wellington Water is still evaluating what is required at Gear Island Water Treatment Plant.

#### **ENDS**

?		gement Manager	
1 04 912 4400 <b>Mob</b> rivate Bag 39804, Wellingto	n Mail Centre 504	15	
evel 4, 25 Victoria Street, Pe www.wellingtonwater.co.n			
r <b>om:</b> ent: Monday, 14 Marc	:h 2022 9:46 p	m	
o:			

Cc:	
<b>Subject:</b> Fluoride comms	-

Kia ora koutou

This is just a guick update on where we are at for fluoride comms.

and I met with GWRC's comms manager today and we have agreed to issue a joint statement on Wednesday morning to announce our decision to stop fluoride dosing at Te Marua and Gear Island.

As discussed at SLT last week, we have started the process of working through the steps to notify our councils ahead of Wednesday's announcement.

Tomorrow will be a key day for us, and has already set up a time for you all and the CCRs at noon tomorrow to let them know about this issue. is also presenting to GWRC (officers and councillors) tomorrow morning to let them know and to outline our comms approach.

We will ensure that all our council comms teams and their customer hubs have a copy of the comms pack including Q&As to help the answer any questions they may get from the public. We will work with GWRC to lead any media enquiries.

Below is the roll out schedule for in the lead up for Wednesday. Attached are our high level key messages that we will use to base our media release and external comms on.

Any questions, let me or know.

Roll out schedule				
Date	Time	Activity	Responsibility	Status
Mon 14	N/A	Council CEOs heads up		Completed
Mar		Water Committee Chair heads		
		up		
Mon 14	1.30pm	Agree comms approach with		Completed
Mar		GWRC comms		
Tues 15	9.00am	Heads up to WCC, PCC, HCC,		
Mar		UHCC comms		
Tues 15	9.30am	Briefing to GWRC	+ SLT	
Mar				
Tues 15	12.00pm	Briefing to WCC, PCC, HCC,	+ SLT	
Mar		UHCC CCRs		
Tues 15	12.00pm	Email to council CEs and Water		
Mar		Committee Chair		
Tues 15	1.00pm	Send comms pack to all council		
Mar		comms teams and their		
		customer hubs		
-				

Tues 15 Mar	1.00pm	Update to RPH on status of WTPs and the project	
Tues 15 Mar	2.00pm	Notify New Zealand Dental Association and provide them with comms pack	
Wed 15 Mar	8.30am	Internal email to let our people know	
Wed 15 Mar	9.00am	Issue joint media release	
Wed 15 Mar	10.00am	Update website	
Wed 15 Mar	N/A	Work with and GWRC to respond to media enquiries as needed	

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### Communications and Community Engagement Manager



Tel 04 912 4400 Mob

Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt

www.wellingtonwater.co.nz



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**Subject:** Re: Item of significance - reliability of Fluoride dosing systems

Any insights ?

Cheers

Sent from my iPhone

On 17/12/2021, at 12:58 PM,

wrote.



Are the fractions reflective of an even spread of when the fluoridation was occurring ie. Was Te Marua only running for two months of the period and no fluoridation for the rest of the period, or is the 20% spread across the period?

**Director of Regulatory Services** 

<image001.jpg>



Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt www.wellingtonwater.co.nz

From:

**Sent:** Friday, 17 December 2021 12:03 pm

To: \* All Senior Leaders <

Cc:

Subject: Item of significance - reliability of Fluoride dosing systems

Morena koutou

Our fluoridation facilities for the metropolitan area have and continue to experience ongoing issues that have reduced the availability and reliability of fluoridation and the consistency of the treated water fluoride concentration. Due to these issues, the percentage of time that the fluoride dosing facilities have been operational is poor due to a variety of reliability issues associated with the plant and the quality of the products dosed into supply.

The issue is of significance as it poses a potential reputational issue, and will take investment and time to resolve.

Your guidance is requested on how and who to communicate the issue to within

our client councils - so that we adopt our usual no surprises approach.

#### **Background**

Fluoride plan operational statistics for January 2019 to May 2020 show the following:

Water Treatment Plant	Fraction of time fluoridation was operational
Te Marua	10-20%
Waterloo	30-40%
Wainuiomata	10-20%
Gear Island*	55%

<sup>\*</sup>Since 1999 the Gear Island WTP has only been used as a standby facility and is typically only run on one or two days each month, to maintain operational readiness.

SWDC currently has no fluoride dosing systems. With the Health (Fluoridation of Drinking Water) Amendment Bill recently being passed through the Health Committee, we may be required to fluoridate all supplies if directed to do so by the Director-General of Health. Those supplies already fluoridating are required to continue to do so unless directed by the Director-General of Health to stop. As a result, the issue may gain more attention in the near future.

#### What are the regulatory requirements?

Dosing of Fluoride is only a regulated issue in the event of exceeding maximum acceptable values stated in the drinking water standards. There is no regulated minimum reliability performance standard at present.

Historically, GWRC has self-imposed a 90% reliability target. The poor reliability experienced is exacerbated by the fact that because fluoridation is not a critical water safety requirement, issues are most easily dealt with by shutting down fluoridation systems - with rectification and reinstatement of fluoride dosing taking a lower priority than other more critical tasks.

#### What are the issues impacting reliability?

Issues contributing to the above at the Water Treatment Plants include:

- Short-circuiting in the treated water reservoirs.
- Poor powder quality,
- Manual powder bag handling,
- Small mixing tanks,
- Incorrect/unsuitable dosing pump types,
- Lack of standby fluoride dosing pumps.
- Dosing pumps doubling as day tank recirculation pumps
- Complex systems with batch makeup and pumped transfer.
- High manual operator input.
- Powder feeder screws not fit for purpose, with lack of turndown or suitable peak capacity
- No access to bottom of day hopper feed screw conveyors to allow maintenance
- Old dosing equipment at the Gear Island Water Treatment Plant the entire system needs replacing.

#### How much will it cost to fix, and how long will it take?

To fix these problems, the fluoride dosing systems need to be upgraded. Preliminary sizing and cost estimates indicated that repairing/replacing the fluoride dosing system at Te Marua will cost between \$435,000 - \$696,000, at Waterloo will cost between \$435,000 - \$696,000, at Wainuiomata will cost between \$384,000 - \$614,000, and at Gear Island will cost between \$384,000 - \$614,000.

Implementation is expected to take several years to complete. In the meantime we (and councils) will continue to carry the reputational risk.

Let me know if you have any further questions.

Ngā mihi

**Chief Advisor – Drinking Water** 

<image001.jpg>

From: To: RE: Updated release Subject: Date: Tuesday, 15 March 2022 4:57:14 pm Attachments: image001.png image005.png image007.png Updated fluoride Media Release re NC comment1503.docx Bingo. loves the release. Thanks for your patience! Your version may differ slightly. Cheers makaurangi Kaiwhakatauira whakanikoniko | Senior Media Advisor – Customer Engagement ? Greater Wellington Te Pane Matua Taiao 100 Cuba St, Te Aro, Wellington 6011 Follow us online: Facebook | Twitter | gw.govt nz From: Sent: Tuesday, 15 March 2022 4:35 PM Subject: RE: Updated release Hiya, here are my changes. Some detail not quite right and I'm wondering if we'll get ourselves unstuck if we focus on the minor detail too much. Be good to get your thoughts. Cheers, **Communications and Community Engagement Manager** Private Bag 39804, Wellington Mail Centre 5045 Level 4, 25 Victoria Street, Petone, Lower Hutt www.wellingtonwater.co.nz

From:

**Sent:** Tuesday, 15 March 2022 4:22 pm

To:

Subject: Updated release

What do you think – last chance before I send it off to him. Have we got it? Cheers





Kaiwhakatauira whakanikoniko | Senior Media Advisor – Customer Engagement Greater Wellington Te Pane Matua Taiao

100 Cuba St, Te Aro, Wellington 6011

Follow us online: Facebook | Twitter | gw.govt nz

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## Response to LGOIMA requests for communications plan for March 16 fluoride media release.

Requests: OIA IRO - 237 and OIA IRO 226

Response for OIA IRO – 237, NZ Herald

The communications plan behind the press release that was issued on March 16 saying "Wellington Water is working quickly to repair equipment that fluoridates the regional drinking water supply, which a recent review found has not been delivering fluoridated water to specification".

Please see attached for the communications plan which informed and outlines the communications approach Wellington Water took to inform councils, stakeholders, and the public of fluoridation being stopped at the Te Marua and Gear Island Water Treatment Plants.

To do this we made a joint public announcement between Wellington Water and the Greater Regional Wellington Council on 16 March 2022 via a media release.

The attached communications plan, its approach and high-level messaging was proposed, discussed and approved by the CE and Senior Leadership Team (SLT) on 10 March 2022. This is noted on the minutes from the meeting, which are also attached.

A more detailed timeline of communications activities and key messages was also supplied to the CE and SLT by the Communications and Community Engagement Manager on 14 March 2022 via email, which is attached.

In the lead up to the issuing of the media release on 16 March, the final version of the media release was approved in writing by the Director Regulatory Services, who was the SLT lead for the work and the Wellington Water spokesperson for the announcement, and the CE of the Greater Wellington Regional Council as the media release was a joint release between the two organisations.

The final media release was sent to the CE and SLT on 15 March 2022. The relevant correspondence for these events is also attached.

Response for OIA IRO 226, Te Rito Journalism

Any information about how the decision was made on when to tell the public about turning off the fluoride and what to tell them, how this decision aligns with Wellington Water's Communications Strategy, and whether this decision was approved by

Please see attached for the communications plan which informed and outlines the communication approach Wellington Water took to inform councils, stakeholders, and the public of fluoridation being stopped at the Te Marua and Gear Island Water Treatment Plants.

To do this we made a joint public announcement between Wellington Water and the Greater Regional Wellington Council on 16 March 2022 via a media release.

It is important to note that the role of the Communications function at Wellington Water is to provide senior leaders with advice on communications approach and messaging. This is provided for feedback and approval by the relevant senior leader(s) once they are happy.

In the case of fluoride, the overarching decision on how and what to communicate sat with the CE and Senior Leadership Team (SLT). The SLT lead and spokesperson for the announcement was the Director Regulatory Services who provided information, feedback and guidance to the Communications Team in the lead up to the announcement.

The attached communications plan, its approach and high-level messaging was proposed, discussed and approved by the CE and Senior Leadership Team (SLT) on 10 March 2022. This is noted on the minutes from the meeting, which are also attached.

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