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Auckland Regional Public Health Service

Rātonga Hauora ā Iwi o Tamaki Makaurau



Working with the people of Auckland, Counties Manukau and Waitemata

Auckland Regional Public Health Service

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Ministry for the Environment
PO Box 10362
Wellington 6143
Attn: standards@mfe.govt.nz.

Submission on the Proposed National Environmental Standard for Assessing and Managing Contaminants in Soil

1. Thank you for the opportunity for the Auckland Regional Public Health Service (ARPHS) to provide a submission to the Proposed National Environmental Standard for Assessing and Managing Contaminants in Soil.
2. The following submission represents the views of the Auckland Regional Public Health Service and does not necessarily reflect the views of the three District Health Boards. Please refer to Appendix 1 for more information on ARPHS.
3. ARPHS understands that all submissions will be available under the Official Information Act 1982, except if grounds set out under the Act apply.
4. The primary contact point for this submission is:

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EXECUTIVE SUMMARY AND KEY RECOMMENDATIONS

5. ARPHS supports the introduction of new standards for assessing and managing contaminants in soil. It regards the incorporation of soil guideline values considered safe for human health (SGVs(health)) into national environmental standards as essential.

REASON WHY ISSUE IS IMPORTANT TO PUBLIC HEALTH

6. The historical use of chemicals in industry, agriculture and horticulture has led to a legacy of soil contamination in New Zealand. This contamination has the potential to adversely affect public health.

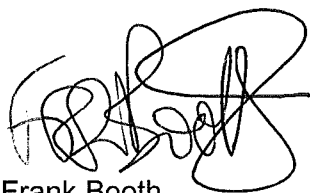
SPECIFIC COMMENTS ON DOCUMENT BEING SUBMITTED ON

7. ARPHS supports the introduction of new standards for assessing and managing contaminants in soil, and setting a standard at which land is considered safe for human health.
8. Further to this, ARPHS strongly recommends the incorporation of soil guideline values considered safe for human health (SGVs(health)) into national environmental standards (NES).
9. The Proposed National Environmental Standard for Assessing and Managing Contaminants in Soil Discussion Document has appropriately addressed SGVs(health) threshold concentrations for contaminants in soil - calculated for generic land-use exposure scenarios at which the exposure is judged to be acceptable because any adverse effects on human health for most people are likely to be no more than minor.
10. Incorporation of these soil guideline values is considered essential by ARPHS - in view of the past use of chemicals in industry, agriculture and horticulture, and the legacy of soil contamination in New Zealand.
11. The document well addresses soil contaminants for the Auckland region, namely heavy metals, and organic substances such as DDT, dieldrin, PCP and dioxin.
12. ARPHS supports the view that it cannot be assumed that affected properties are safe for use unless they have been systematically identified, assessed and as necessary, contained or remediated.
13. With respect to draft recommendations on toxicological intake values for priority contaminants, ARPHS would prefer the most conservative international evidence be implemented when setting a toxicological intake value on which to base soil guideline values.

CONCLUSION

14. ARPHS supports the Proposed National Environmental Standard for Assessing and Managing Contaminants in Soil.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Frank Booth', written in a cursive style.

Frank Booth
Service Manager
Auckland Regional Public Health Service

A handwritten signature in black ink, appearing to be 'Simon Baker', written in a cursive style.

Simon Baker
Medical Officer of Health
Auckland Regional Public Health Service

APPENDIX <1> - AUCKLAND REGIONAL PUBLIC HEALTH SERVICE

Auckland Regional Public Health Service (ARPHS) provides public health services for the three district health boards (DHBs) in the Auckland region (Auckland, Counties Manukau and Waitemata District Health Boards), with the primary governance mechanism for the Service resting with Auckland District Health Board.

ARPHS has a statutory obligation under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities in the Auckland region. The Medical Officer of Health has an enforcement and regulatory role under the Health Act 1956 and other legislative designations to protect the health of the community.

ARPHS' primary role is to improve population health. It actively seeks to influence any initiatives or proposals that may affect population health in the Auckland region to maximise their positive impact and minimise possible negative effects on population health.

The Auckland region faces a number of public health challenges through changing demographics, increasingly diverse communities, increasing incidence of lifestyle-related health conditions such as obesity and type 2 diabetes, outstanding infrastructure needs, the balancing of transport needs, and the reconciliation of urban design and urban intensification issues.