

16 April 2010



Ministry for the Environment,
PO Box 10362,
Wellington 6143.

To whom it may concern,

**Tauranga City Council Submission to the Proposed National Environmental Statement
for Assessing and Managing Contaminants in Soil.**

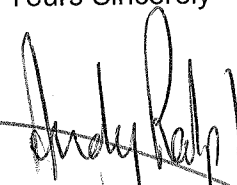
Please find attached the Tauranga City Council (TCC) submission to the Proposed National Environment Standard for Assessing and Managing Contaminants in Soil (the Proposed NES) (Attachment 1).

The TCC Submission is structured to respond to 'General' then 'Specific' questions posed in the Proposed NES Discussion Document. 'Other Matters' identified in the review of the Proposed NES conclude the TCC Submission. The key issues raised in the TCC submission include:

- The proposed permitted activity status for site investigations, particularly in respect to cost recovery for auditing investigation reports.
- The limitations of the Policy Objective which only addresses human health, not environmental protection.
- Uncertainty in respect to local government responsibilities in implementing the Proposed NES.
- Liability issues around the auditing of soil investigation reports.
- Ambiguity in some of the terminology used.

If you require any further information or clarification please contact Ayy Greenway, Planner: Environment on (07) 577 7329 or via email (ayvron.greenway@tauranga.govt.nz).

Yours Sincerely


Andy Ralph
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Tauranga City Council

TCC Ref: 3069748