

## **Submission for NES Proposed for Soil Contamination**

The proposed NES are not protective enough of human health as they do not include the potential effects of eating foods derived from land including fat condensing foods such as eggs, dairy products and meat. The NES should include the potential for landowners to be self sufficient from their land as this could be their (or subsequent owners) expectation.

The SGV values proposed for some metals would be ecotoxic to plants making the figures appear meaningless for human health.

The proposed standards would not require a site investigation if the land being subdivided was not undergoing a change in use. However this discounts the possibility that the land could already be contaminated. This is likely to be the case on old horticultural land which could now be already in residential development or lifestyle blocks. Site investigations should be required as we know how persistent some of these contaminants are and site history information is becoming more difficult to verify.

If site contamination investigations are allowed to be permitted activities there is no guarantee that the results will be forwarded to Council as it may not be in the owner's interest to have the information recorded against the property. This leaves the potential buyer at risk as they may not associate any historic use of potentially harmful chemicals with the current use of the land which may not show any signs of the former use (eg; horticultural land, tobacco cropping or historic sheep dip sites).

16 April 2010

### **Submitter:**

Jennie McGuinness (BE Hons Agricultural) Environmental Engineer  
Cameron Gibson & Wells Ltd