

SUBMISSION ON PROPOSED NATIONAL ENVIRONMENTAL STANDARD FOR ASSESSING & MANAGING CONTAMINANTS IN SOIL

Part 5 Resource Management Act 1991

Details of Submitter

Person Making Submission

Medical Officer of Health
Canterbury District Health Board

Postal Address

Community and Public Health
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Our Reference Number: 01 0601

Details of Submission

1. **The reasons for making this submission are** to assist in the sustainable management of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while—
 - (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
 - (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems;
and

(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.

Engaging in the above Resource Management Act processes also advances Canterbury District Health Board's public health objectives to:

promote the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health

pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

2. The Submitter strongly supports the introduction of the National Environmental Standard, while acknowledging its limited scope, and identifies an area where it believes the development process for the NES has been deficient.

- The introduction of the proposed National Environmental Standard (NES) is supported, as it will provide greater certainty to landowners, developers and regulatory authorities when dealing with known or suspected contaminated land.
- In particular, the introduction of chemical-specific soil contaminant thresholds that will define an adequate level of protection for human health for a range of land uses is supported as it provides for substantial degree of protection for the health and safety of people and communities.
- It is recognised that the proposed NES has limited scope, in that:
 - it is restricted to soil, and excludes contaminated ground and surface water, and
 - it only applies to soil at the point at which land is being developed or redeveloped.
- Our concerns, in relation to both the NES and the HAIL list, are that collectively they do not adequately identify and publicise the issue of the large number of residential properties that are, or probably are, contaminated with soil lead residues above the soil guideline values. This contamination derives from lead based paint commonly used on the exterior of older painted houses and other buildings, and occurs via natural weathering of the paint and/or renovation activities in relation to repainting house exteriors.
- It is seems likely that the scale of lead paint contamination of soils, particularly in urban locations, is significantly unrecognised at present¹. This will have implications in relation to property owners and developers perceptions of such sites and, perhaps, the capacity of regulatory authorities to resource the issue when such sites are redeveloped.

3. *I do not wish to be heard in support of my submission*

However Lew Graham can be contacted via the address at the top of the submission to discuss any aspects of the submission.

¹ Except in certain specific situations such as development of sites for Early Childhood Education and Care Centres, when such issues can be addressed, and are, usually via the licensing process.

A handwritten signature in black ink, appearing to read 'Lew Graham', is enclosed within a rectangular border.

For Dr Ramon Pink

Medical Officer of Health

Date: 15th April 2010