

## **2) Submission for**

My submission is for the Proposed National Environmental Standard for Assessing and Managing Contaminants in Soil

## **3) Support**

I support the proposed standard

## **4) My Submission (Questions, Comments, Proposed Changes)**

### Policy Objective

Although I do support the proposed standard I was hoping that it would be a standard that included and focuses equally on the environment. I feel that the standard needs to include protection of the environment because:

- 1- Environmental health is as important as human health.
- 2 - New Zealand promotes a clean green image. Our standards should reflect a focus on this image and focussing only on human health does not cut the mustard.
- 3 - It is necessary to have a clean and healthy environment in order to protect human health. It is unclear as to whether the standard is meant to protect human health further up the food chain than immediate contact with contaminated soil or plants grown in contaminated soil.

My hope is that this standard will force one or more standards for the protection of the environment.

### Permitted activity

I think the activity outlined as permitted and the required information to be provided is sufficient. There must be some ownership on the person proposing any development as well as the consultancy providing the professional assessment to submit any reports on contaminated land. For areas with a known HAIL activity the council would expect to see a report on the likelihood of contamination. For those not currently listed as a HAIL site there has to be some reliance on either the person or assessing consultancy to "do the right thing".

### Cost of processing and consent.

I think the cost for processing any applications and review of reports needs to fall largely on those wishing to develop the land rather than councils. Why should tax payers help fund the development of someone else's land?

### 12 Selected Parameters

Some clarification is required on how this standard can or cannot be used to enforce or control land that has elevated levels of contaminants not included in the 12 parameters outlined in section 8. Furthermore, clarification on whether this standard can or cannot be used to help control the effects on the environment.

### Produce Consumption

I think a SGV value for needs to be adopted that is independent of the amount of produce grown at an individual property.

### Background Contaminants in Soil

Naturally occurring contaminants in soil should be treated as a natural hazard and be controlled at the discretion of the council.

## **5) Decision**

Despite any reservations I may have about particular aspects of the Propose Standard I would hope that the Minister will pass this standard. I feel this standard will provide the required push to force some councils to address environmental contamination and to help get this country up to speed in managing its contamination.

Kind Regards,

**Shane Greene**  
**Engineering Geologist.**