



25 August 2006

S06.35

**Submission to the Ministry for the Environment on the Consultation Draft
for New Zealand's National Implementation Plan for
Persistent Organic Pollutants**

Introduction

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 38 nationally organised societies, with 31 branches throughout the country, to which many local organisations are affiliated as well. The function of the Council is to serve women, the family and the community through research, study, discussion and action.

Because women are in the main responsible for the health of the family and the community, the discussion around the use and persistence in the environment of organic pollutants has been joined by NCWNZ for many years and many submissions have been made (Sub05.23 – the HSNO (Approvals and Enforcement) Bill; Sub02.32 – Towards a Pesticide Risk Reduction Policy; Sub00.19 – HSNO Bill No.2). Those who have responded to requests for comment on the draft consultation paper come from urban, small town and rural sectors, so there is a wide range of knowledge and experience represented in this submission.

General Summary of Comment

NCWNZ members are in favour of the Implementation Plan as it is currently presented, and are pleased to see that careful attention has been paid to complying with the several areas of concern outlined in the Articles of the Stockholm Convention. NCWNZ has followed the development of measures already taken to protect human and environmental health from the effects of Persistent Organic Pollutants (POPs), and is pleased to see that the rapid response to the threats, which resulted in the passing of the HSNO Act 1996 and the Imports and Exports (Restrictions) Prohibition Order 2004, as well as ceasing the use of leaded petrol, chlorine bleaches, and dioxin-producing timber treatment agents and herbicides, have resulted in New Zealand having a very low level of POPs detectable in the environment. NCWNZ believes that implementing the plan will go a long way toward the desired goal of entirely eliminating POPs from the environment.

Specific Comments (numbers refer to pages of the discussion document)

5. Article 11: Research, development and monitoring.

With respect to the bio-monitoring programme for breast milk and serum, managed by the Ministry of Health and the Ministry for the Environment, to track the New Zealand populations declining exposure to POPs, NCWNZ members responded that monitoring should continue “as long as it takes,” more precisely; until detectable levels are so low as to be insignificant; twenty-five years; until the levels in human tissues can no longer be associated with a threat to health; until scientific opinion recommends discontinuation. It was suggested that even after discontinuation of regular monitoring, there should be an occasional check of sectors of the population, which might be expected to still have POPs in their tissues (children and grandchildren of those who during their lifetime had considerable exposure).



**11. Table 4: Summary of Article 3: obligations and legal measures taken to eliminate the production and use of POPs**

NCWNZ members endorse what has already been done to comply with the obligations of the Convention through the legal measures outlined. They were specifically asked if they agreed with Article 3.5: use of POPs for laboratory-scale research or as a reference standard is enabled.

All respondents agreed that Article 3 should stand, with the following remarks regarding Article 3.5:

Every care should be taken to ensure that there is no accidental release of any POP from laboratory containment; it is best that such research be undertaken within New Zealand rather than relying on overseas findings, since our soil and water chemistry, native species and climate are peculiar to this country and POP effects may be different here; ERMA has not in the past always made good decisions although this may have been because of lack of information being available; strict controls are necessary within the laboratory.

50. Article 5 (a)(v): review, evaluate and report on strategies every five years in meeting dioxin reduction obligations.

Because of the problem of dioxins in the tissues of women, and their passage to the unborn child through the placenta and to the infant through breast milk, that the level of dioxin production be reduced as fast as possible has been and continues to be of great concern to women. Thus we are delighted to see that through measures undertaken ever since the problem was discerned; the amount of dioxin released into the environment has steadily decreased. Especially pleasing is the result of the 2001 study which showed that between 1988 and 1998 there was a 70% decline in the body burden of dioxins, and we hope to see that the ensuing ten years will also show that decline is the continuing trend. Most responding NCWNZ member groups are comfortable with the requirement of the Convention to review the Action Plan for Dioxins every five years, but three groups did feel that every three years might be better, as any anomalies in what is expected of the plan would be more quickly revealed. One respondent, agreeing with five yearly review, nevertheless suggested that if anything out of the expected did seem to be occurring, there should be provision for immediate review of the effects of following the strategies. All agreed review should be no less frequent than five yearly.

18. Article 6: stockpiles and wastes. NCWNZ is concerned that during the period lasting until June 2009 when follow-up collections of unwanted and unused agricultural chemicals will cease, that these chemicals be stored in complete safety. NCWNZ commends the second part of the plan, to establish long-term systems to ensure that stockpiles of agrichemicals do not build up again, but we are a little anxious about the phrase "ERMA ...will promote among rural property owners the safe interim storage of historical POPs." We see that the Ministry for the Environment and ERMA have conjointly published a pamphlet explaining the requirements to store surplus agrichemicals safely until they can be properly disposed of, but how can anyone be sure that it is read by those at whom it is aimed? Or that despite the most responsible actions to store these chemicals safely, an accident might not occur? NCWNZ members have some suggestions to make: that central government give financial assistance to local bodies in order to speed up the collection and disposal process; the agricultural/horticultural industries undertake the responsibility of ensuring that every member of their respective groups knows about and complies with the requirement to store chemicals in absolute safety; it is ensured that farmers remember it is important to keep these chemicals labelled - labels can fall off - so that they know what they have in the shed, and how it should be handled; depending on available money, local bodies should at intervals distribute reminder pamphlets emphasising the need for safe storage chemicals should be sold only in small quantities; of chemicals; in the future, such manufacturers and distributors should have some responsibility for bringing in and disposing of unwanted products. NCWNZ would like to see the process of collecting agrichemicals from the nation's sheds proceed more rapidly. What will happen after 2009?



18. Activities to manage POP-contaminated land. One respondent is from an area where historically there has been a problem with soil contamination, and was very pleased at the establishment of the Contaminated Sites Remediation Fund, which will relieve the burden on local people to pay for the necessary clean-up. Her local NCWNZ branch has had first-hand experience of the effects of chemical contamination in the workplace and the environment, and the impacts on the health of the people and the local economy. For the people of that district (Whakatane), decontamination cannot proceed fast enough. In general, NCWNZ members believe that the costs of cleaning up contaminated land should not be borne by local or regional rate-payers, and are pleased that the Remediation Fund is available to call upon, while also remarking that there need to be limits set on the amount of money spent on any one site. The desire to decontaminate must have reasonable expectations. Housing, schools and playgrounds should not be planned on or near decontaminated sites for a very long time, and finally, care should be taken to ensure that such contamination never happens again.

Conclusion

It is pleasing to see this draft plan of action in the public arena for comment so early, leaving plenty of time for consultation then finalisation before the May 2007 Conference of the Parties. The aim of the Convention is to ensure that the people of the world and their environment will not in the future suffer from the appalling mistake made in the mid-twentieth century, to use, unrestrictedly, chemical compounds about which almost nothing was known. NCWNZ is pleased to endorse the draft plan as a comprehensive, thoughtful and seemingly exhaustive response to the call to develop a National Implementation Plan for eliminating Persistent Organic Pollutants, and hopes that the final plan will be acceptable to the Conference.

Christine Low
National President

Elizabeth Lee
Convener, Environment Standing Committee