

Lisa Mackenzie

From: Louisa Young <[REDACTED]>
Sent: Thursday, 5 July 2018 9:44 p.m.
To: submissions
Subject: Proposed risk assessment methodology for hazardous substances

Please disregard first submission just sent – this is Amended – Thank you.

Submission for Proposed risk assessment methodology for hazardous substances

Is the level of detail appropriate?

No – the statement ‘Many of the products we use everyday are hazardous substances. Petrol, solvents, industrial chemicals, household cleaners, and some cosmetics are all examples of hazardous substances.’ needs to include hazardous substances like what DoC is putting over millions of hectares in NZ – i.e. 1080 – that is toxic and a hazardous substance.

Do you consider that there are any other matters that should be addressed as part of this methodology?

EPA needs to follow this as a guideline for deciding on whether toxic substances can be used in NZ. It is very apparent after reading this that something as toxic as 1080 should not be aerially dropped anywhere ‘Where an application relates to a hazardous substance, the Authority must also evaluate information which addresses the effects of the substance through its life cycle and the risks, costs, and benefits flowing from the following characteristics associated with the substance:

- (a)explosiveness:
- (b)flammability:
- (c)capacity to oxidise:
- (d)corrosiveness:
- (e)toxicity (including chronic toxicity):

The use of 1080 aerially over a wide range of NZ needs to be reviewed. Presently it can be dropped into waterways. It is known to be causing deaths of many animals and carcasses are left to rot in waterways. There is a register which EPA needs to look at of deaths and injuries to animals and people close to drops. This is a hazardous substance and with all the talk about our waterways not being clean from dairy, 1080 is a huge risk factor also given the amount of problems for people and animals close to aerial drop areas. Please read this document thoroughly. <http://www.scoop.co.nz/stories/PO1802/S00160/open-letter-regarding-1080-and-brodifacoum-poisoning-events.htm>

EPA needs to be thorough in researching hazardous substances – they are failing to address one of the biggest cause of problems in NZ – 1080.

Soon NZ will not be a country that can be taken seriously as 1080 has been banned in most countries around the world.

Cheers, Louisa Suzanna