

Proposed risk assessment methodology for hazardous substances

Submission Reference no: 4

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Submitter Type: Not specified

Source: Email

Overall Notes:

Clause

7. Are there alternative groundwater models that the EPA could consider as part of a revised groundwater risk assessment framework?

Notes

Look for water tests that measure in parts per trillion as hormonal changes can occur at these low levels.

Clause

I would like my personal information (other than my name) to be withheld from any publicly available response documents.

Position

No

Notes

How can a methodology such as using a cost effective analysis of hazardous eco-toxic poisons to reach the predator free 2050 goal take precedent over putting the health of the NZ population at risk? Or herbicides sprayed along riverbeds, park settings or play grounds? My belief is that known eco-toxic substances currently freely deposited around New Zealand, such as compound 1080, brodifacoum (and other anti-coagulants), Thordon, Roundup and other poisons, that are not target specific have no place in our society. The end goal doesn't not justify the means.

A real health threat for future New Zealand generations that needs to be taken into account: For example, compound 1080 is known to cause male reproductive toxicity (US EPA 1994) amongst many other health issues. <https://oehha.ca.gov/proposition-65/crnrr/request-information-chemicals-under-consideration-possible-listing-authoritative>

A German Environmental and Resource Student highlight in his paper that the ethical limitations of using the 'cost-benefit analysis' method become apparent in areas of environmental, safety and health regulations.

The 26.5 tonnes of brodifacoum dropped alongside a Nelson neighbourhood highlighted a raft of government departments and agencies passing the buck when I inquired about the safety of this practice. The impact of mass applications show in research papers a lot of knowledge gaps both in regards to human health, impact on soil and eco-systems, what is deemed acceptable by-kill of non-targeted species, the moral obligations we have to act in a humane manner to all wildlife species (as we do have a law that acknowledges that animals are sentient beings), the value and cultural traditions many people and communities put on a diverse wildlife and plants whether it is for a recreational purpose, the wellbeing of being safe in outdoor areas with family, pets or domestic animals or for hunter-gatherers. I do not believe poison warning signage reflect that adequate responsibility of the dangers of highly toxic substances on our land by local and government officials/departments/agencies are acceptable or that poisons in our environment as a definition as something hazardous which can cause illness or death are taken seriously. <http://www.icrp.org/docs/6/11.%20Philosophical%20Critique%20of%20Limitations%20of%20Cost%20Benefit%20Analysis-Stuck.pdf>

Steven Kelman writes “Finally, of some things valued very highly it is stated that they are “priceless” or that they have “infinite value. Such expressions are reserved for a subset of things not for sale, such as life or health. Economists tend to scoff at talk of pricelessness. For them, saying that something is priceless is to state a willingness to trade off an infinite quantity of all other goods for one unit of the priceless good, a situation that empirically appears highly unlikely. For most people, however, the word priceless is pregnant with meaning.”

The ‘cost effective’ principle also does not take into the account the future costs of turning children and adults into patriotic killers to achieve a goal such as predator free 2050. The cost of devaluing species in especially a young child has a potential to make for a very unsafe and uncaring society. Research repeat again and again that the killing of animals at a young age has a potential to cause negative effects in other situations later in life. It is an effective grooming ground for psychopaths. What would the long-term cost be for such a society?

Conflict of interest: MPI for example has the task of looking after animal welfare and the same time their other task is to keep growing the export industry. This is a conflict of interest within the same department. Another example is DoC. This agency do not use brodifacoum which is an eradication tool apart from on island setting due to its high eco-toxicity to many species and its inhumaneness which Landcare Research has established. However, DoC do not speak up and they even support community groups, local councils to use these eco-toxins in bait stations all around the country. If this predatorfree 2050 goal wasn't being pushed, DoC in their capacity of ‘managing public land’ with access to all these studies ought to advocate for this poison to be banned or only used in highly restricted ways with minimal impact to any other outdoor users of land. Conflict of interests override best environmental and humane practices.

What is viewed as a ‘cost-effective’ methodology short-term is indeed very short sighted. I believe the only way forward is to adopt a pre-cautionary principle to environmental, safety and health regulations.

Thank you for your time.

Helen Black