

Canterbury

District Health Board

Te Poari Hauora o Waitaha

Submission on Beneficial Use of Organic Waste Products on Land 2016/2017 Consultation

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SUBMISSION ON

BENEFICIAL USE OF ORGANIC WASTE PRODUCTS ON LAND CONSULTATION

Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting 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. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.
3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.

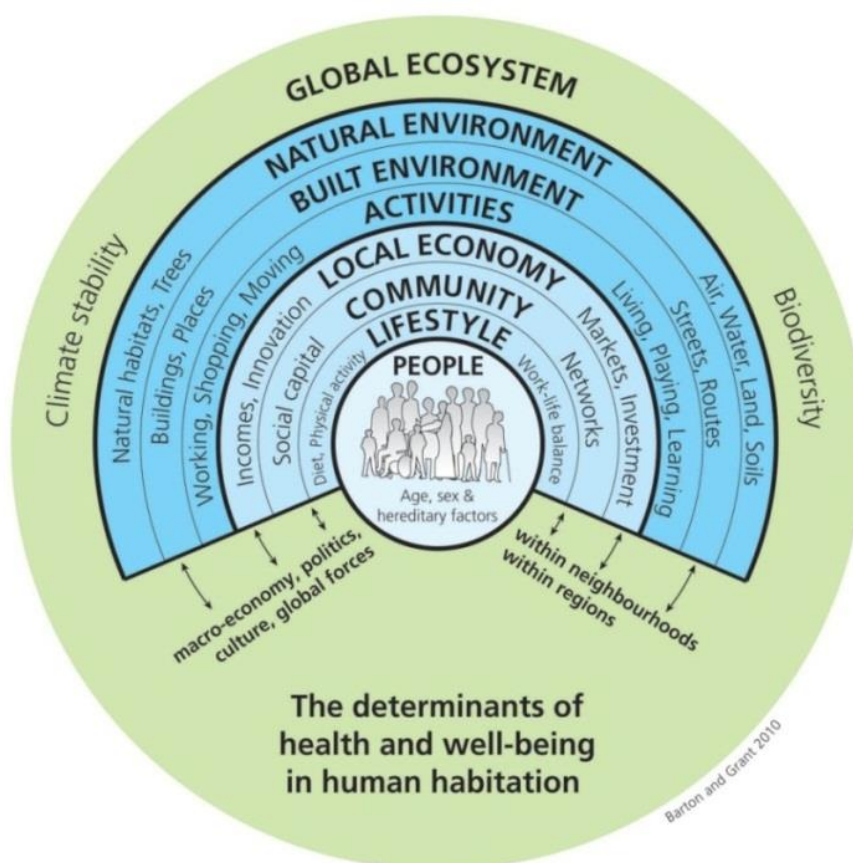
Details of submission

4. The CDHB welcomes the opportunity to comment on the Beneficial Use of Organic Waste Products on Land Consultation. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively.
5. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. Health care services manage disease and trauma and are an important determinant of health outcomes. However health creation and wellbeing (overall quality of life) is influenced by a wide range of factors beyond the health sector.
6. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the social determinants of health¹.

¹ Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

The diagram² below shows how the various influences on health are complex and interlinked.

- The most effective way to maximise people’s wellbeing is to take these factors into account as early as possible during decision making and strategy development. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact³.



² Barton, H. & Grant, M. (2006). A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health*, 126(6), 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

³ McGinnis, J.M., Williams-Russo, P., & Knickman J.R. (2002). The case for more active policy attention to health promotion. *Health Affairs*, 21(2), 78-93.

General Comments

8. The Canterbury District Health Board commends Water New Zealand for developing a guidance document aimed at achieving consistent management of organic waste products on Land.
9. There is considerable potential to reduce the burden on landfills by using organic based products on land. The CDHB has a number of recommendations for consideration which would further improve health outcomes for the community by providing more specific guidance. These recommendations are listed below.

Specific comments

10. **Consent Criteria** - Whilst the value of applying organic waste products to land is acknowledged there are no clear limits in the *Guide* about what criteria determine the consent category for a specified activity and the associated compliance criteria which should be applied. It is possible that these aspects are outside the scope of the guidance document but the absence of clarity around this creates some concern. There are potential problems with activities of this nature which require controls, and our concerns largely relate to aspects of the operation which if unchecked could create a public health risk.

Recommendation 1: Develop clear guidance on consent criteria categories including, permitted, controlled, discretionary, restricted discretionary, non-complying and prohibited categories.

11. **Management Plans** - Management Plans that include criteria about the operational procedures are a useful tool to ensure all aspects of the operation are run according to procedures and within safe guidelines. In addition to the topics covered in the *Guide* the monitoring scope and routine Management Plans should also include the following so as to mitigate any adverse impact on the environment and the health of the public - bunding, blending, slope, temperature controls and setbacks from residential properties, pest management, maximum area, volume of stockpiles, setback between stockpiles, odour management, fire risk and location over unconfined aquifers. The inclusion of these aspects will be reliant on the specific type of operation and location. The *Guide* could be an important reference document to ensure that these aspects are encompassed in any activity planning.

Recommendation 2: Provide guidance around aspects of the operation which may impact on public health and encourage the development of Management Plans as a means of control.

12. **Quality Control:** Whilst the intention of the *Guide* is to provide for the application of 'good quality products' to existing soils and specifies the type of material that are suitable there is concern that monitoring will be unable to identify contamination. It is feasible that the history of the source cannot be guaranteed and analysis will not be specific enough to identify an impurity which may potential contaminate ground water or create a public health risk.

Recommendation 3: Develop guidance around criteria for accredited sources.

13. **National Environmental Standards:** The acceptable concentrations of metals in composting material are above the residential guidelines and inconsistent with the National Environmental Standard (NES) for Contaminated Land, NES for Contaminated Soil Regulations, Toxicological Intake Values for Priority Contaminants in Soil (MfE 2011) and Methodology for Deriving Standards for Contaminants in Soil to Protect Human Health (MfE 2011). It is not appropriate for the guidance document to allow levels of metals above the environmental standards.

Recommendation 4: The consultation document should be revised in order to be in-line with the NES for Contaminated Soil Regulations, the Toxicological Intake Values for Priority Contaminants in Soil (MfE 2011) and Methodology for Deriving Standards for Contaminants in Soil to Protect Human Health (MfE 2011).

14. Aerosols and Respiratory Health: There is no mention of bioaerosols and the risk from the creation and dispersal of respirable pathogens in the guidance document. Exposures to bioaerosols are associated with a wide range of health effects with major public health impact, including infectious diseases (legionellosis), acute toxic effects, allergies and cancer.

Recommendation 5: Develop guidance around temperature control, setbacks from residential properties and aerosol containment to reduce the risk of bioaerosols dispersion.

15. Composting Standard; NZ Standard 4454:2005 Composts, Soil Conditioners and Mulches is mentioned only twice in the consultation documents. The Standard details requirements for large scale composting facilities, and provides valuable guidance, it could be more effectively referenced in the guidance document.

Recommendation 6: Increased reference to the guidance material detailed in the NZ Standard 4454:2005.

16. Reference to Regional Council Rules: There is no link in the guide to Regional Council Rules around Odour and Odour Management Plans and Incident Reporting Logs. These provide a valuable tool to manage odour discharges and potential public health nuisances.

Recommendation 7: Provide reference to Odour Management Plans and Incident Reporting Logs.

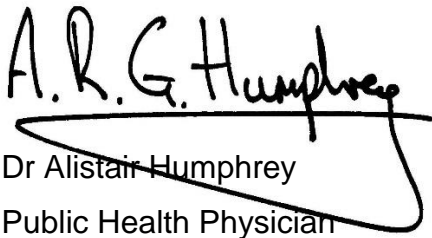
Summary

17. The CDHB recommends that further refining and amending of the *Guide* is required in order to minimise adverse public health impact from depositing organic waste products onto land.

Conclusion

18. The CDHB does not wish to be heard in support of this submission.
19. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.
20. Thank you for the opportunity to submit on Beneficial Use of Organic Waste Products on Land Consultation.

Person making the submission


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Date: 30th March 2017

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