



COMMENTS ON

**WATER NEW ZEALAND GUIDELINES FOR
BENEFICIAL USE OF ORGANIC MATERIALS ON PRODUCTIVE LAND**

To:

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From:

Medical Officer of Health
Public and Population Health Services
Northland District Health Board
WHANGAREI

Guidelines for Beneficial Use of Organic Materials on Productive Land – 2nd Draft for public comment

Thank you for the opportunity for the Public and Population Health Services, Northland District Health Board (NDHB) to provide comment on the above *draft Guidelines* for public comment.

The submission is from the Medical Officers of Health, Public and Population Health Unit, Northland District Health Board (DHB), Whangarei. The Medical Officers of Health are public health physicians who provide independent specialist advice on matters that relate to population health, and have an overall statutory role to improve, promote and protect the health of Northlanders. Northland Public and Population Health Unit (the Unit), one of 12 in New Zealand, is the only provider of comprehensive, regional public health services in Northland.

The 2nd Draft of the old 2003 Biosolids Guidelines should provide a useful reference for those working in this area.

We would like to reiterate the following: in our view this document needs to be adopted by the Ministry for Environment (or assimilated into any National Environmental Standard that may be developed to capture application of organic waste products to land) to ensure that organic waste products applied to land (or made available for sale to the consumer) do not pose an environmental and/or public health risk to the community.

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**Guidelines for Beneficial Use of Organic Materials on Productive Land – 2nd Draft for public comment****Comments**

Firstly, we are strongly supportive of the inclusion of “protecting public health and the environment” in 1.3 Purpose of this Guide. Organic materials if not managed appropriately do have the potential to pose a risk to human health.

Secondly, this document is a “Good Practice Guide”. Guidelines allow people who want to do the right thing to do the right thing. However, they carry no regulatory weight. This could be achieved by making it a Standard, or a National Policy Statement. In addition, most Guides are “Best Practice Guides” rather than just Good Practice Guides – is there a reason that this document isn’t “Best Practice” ?

Thirdly, this document needs to be owned by a government department. In other jurisdictions this document would be owned by the relevant Environmental Authority. In New Zealand, the relevant Environmental Authority is the Ministry for the Environment. Without this organisational endorsement, it is possible that this document will simply be ignored.

Conclusion:

Thank you for the opportunity to provide this feedback. The Guide (comprising of Volume 1 and Volume 2) is a repository of useful information and we look forward to the document being finalised.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'V. McLaughlin'.

Dr Virginia McLaughlin
Medical Officer of Health