



**National Council of
Women of New Zealand**

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**Submission to the Foreign Affairs, Defence and Trade Select Committee
on the Hazardous Substances and New Organisms
(Stockholm Convention) Amendment Bill**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 nationally organised societies. It has 34 branches throughout the country attended by representatives of those societies and some 150 other societies as well as individual members. Its purpose is to work for the well-being of women, families and society through research, discussion and action.

This submission is written on behalf of the Environment Standing Committee.

Executive Summary

NCWNZ supports this Bill in its intention and is pleased to see the problems from Persistent Organic Pollutants (POPs) being addressed. Strong support is given particularly for increased funding for research into the management and remediation of toxic waste.

NCWNZ queries the definition of environmentally sound disposal, and suggests there needs to be a mechanism for adding other, newly-recognised polluting substances to the list in Schedule 2A. NCWNZ also considers that there needs to be clarification of Clause 8 to enable research into POPs to continue.

Introduction

NCWNZ has had policy on hazardous substances since 1959 and has made comment regularly on these issues. Submissions have been made to policy documents, most recently to "Towards a Pesticide Risk Reduction policy for New Zealand" released by the Ministry for the Environment in June 2002. NCWNZ is pleased to have another opportunity to submit on this topic, and notes that Schedule 1AA requires consultation with stakeholders, "including women's groups and groups involved in the health of children" (page 19, lines 6-7, Schedule 1AA). This is satisfactory, and we hope that consultation will take place when necessary.

Specific Comment.

NCWNZ notes the intention to enact this Bill so that New Zealand could ratify the Stockholm Convention before or at the World Summit on Sustainable Development in August – September 2002 (explanatory notes, page 1). NCWNZ further notes that the Bill is before the House now, six months after this Summit, and queries the delay. Nevertheless, it is pleasing to see that the Stockholm Convention will be ratified and NCWNZ supports this step.

Part 2, Clause 4 contains definitions of phrases to be inserted in the Principal Act; NCWNZ queries the definition of "environmentally sound disposal". On page 2, lines 21-22 this is given as "*(b) does not include diluting the substance with another substance before discharge into the environment.*"

NCWNZ argues that dilution, when coupled with phytoremediation, does provide an environmentally sound means of disposal of pollutants. Frequently, POP-contaminated soil is diluted with clean soil to allow for disposal of the contaminated soil to landfill. The disposal of this material to landfill is not a real solution to the problem, rather it is deferring the problem to a later





date. NCWNZ is heartened by the fact that there are more environmentally sound methods of disposal under development.

The definition of persistent organic pollutant (page 2, lines 23-29) contains only a short list of ten substances, with some POPs previously used in New Zealand such as PCP not being included on the list. NCWNZ suggests that there needs to be a mechanism for adding other known pollutants to the base list for application in this country.

The new section 25B will prohibit the use of a POP for a use not specified in Schedule 2A if its use has been restricted by ERMA (page 3, lines 26-30). NCWNZ notes that there are no uses given in Schedule 2A, except for polychlorinated biphenyls.

NCWNZ is pleased to see that the overall tenor of the Bill is such that research into the effects and remediation of POPs is permitted. Clause 7 to amend Section 30 of the Principal Act (page 4, lines 12-20) to permit the manufacture or import of small amounts for analytical standards will enable researchers to measure levels of pollution against a known value; this is important for establishing the degree of contamination.

In NCWNZ's view, clause 8 contains an inherent contradiction. Research use of hazardous substances is permitted as long as it does not involve a POP (page 4, line 25). This implies that research into POPs cannot use POPs in research. NCWNZ questions how such research can proceed without involving the substance, and suggest strongly that this be clarified to enable research, such as that into remediation strategies, to proceed expeditiously.

NCWNZ supports the benefits of the proposal as outlined on pages 6 and 7 of the explanatory notes. The protection of health and food standards are both very important, and NCWNZ is pleased to see the recognition of the need for "*...enhanced access to best practice procedures and strategies for managing POPs and addressing POP stockpiles, wastes, and contaminated sites*". A body of research into these topics is being built up within New Zealand by organisations such as the Environment and Risk Management Group of HortResearch, based in Palmerston North. NCWNZ hopes that more funding will be channelled into this and similar groups to facilitate the continuation of this important research. Support for these remediation investigations would enable New Zealand to continue to protect its clean, green image.

Conclusion

New Zealand is promoted internationally as a clean, green country, but the image and reality do not always match. New Zealand has many sites contaminated with POPs, a legacy of their previous widespread use in primary industry; this means that it is this country's interests to abide by the Stockholm Convention, and NCWNZ supports its ratification. Because of the importance of our overseas image, NCWNZ regards increased financial support for research to address management and remediation of POPs as vital, so that the reality does come to resemble the image more closely.

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