



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

National Office
Level 4 Central House
26 Brandon Street
PO Box 25-498
Wellington 6146
(04) 473 7623
www.ncwnz.org.nz

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**Submission to the Local Government and Environment Select Committee
on the “Hazardous Substances and New Organisms Bill (No 2)”**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 nationally organised societies. It has 36 branches spread throughout the country to which women from some 150 societies are affiliated.

This submission is made after consultation with members of the Environment Standing Committee and is supported by submissions made in 2000 to IBAC on “The Economic Implications of a First Release of Genetically Modified Organisms in New Zealand, in 1999 to the Ministry for the Environment on “Managing Hazardous Waste: A Discussion Document”, and in 1998 to the Environmental Risk Management Authority on draft protocols.

Summary :

NCWNZ supports the definitions used and the changes to wording to improve the understanding of the current Act, and that agricultural chemicals be included within the provisions of the Act.

NCWNZ urges caution in approving substances too rapidly without consideration of each one’s risks and merits.

NCWNZ does not support the exemption of dwellings from inspection under the Act.

Specific Clauses

Clause 2 Interpretation.

NCWNZ commends these definitions for their clarity and notes that they will not allow misinterpretation, either accidental or deliberate. In particular, the definition of risk stands out for its simplicity and brevity, while ensuring that the term “magnitude” includes the concept of irreversibility.

Clause 7 Application for approval to import or manufacture hazardous substances.

This amendment ensures consistency with the intention of the Act to focus on substances rather than people. Use of the word “approved” rather than “prescribed” assists the application of the law by allowing for discretion to be exercised in individual cases. NCWNZ expects that the fundamental precautionary principle of the Act will be maintained and that any new substance will show some benefit not previously present.

Clause 8 Rapid assessment for importation or manufacture of hazardous substances.

While NCWNZ understands that this clause is designed to save time in processing applications for substances that are very similar, NCWNZ expects that each substance would need to be approved for its own properties and merits rather than being “grandparented” through the approval procedure.





Clause 9 Approvals for innovative agricultural compounds and medicines.

NCWNZ is pleased to see that the exclusion of these from the original Act will be corrected.

Clause 12 Exemption from the Act for small-scale research on hazardous substances.

This change meets the concerns of researchers and educators and NCWNZ supports it.

Clause 28 Powers of entry for inspection.

NCWNZ does not support the exclusion of dwellings from Section 103 (1)(a), unless this has been provided for under other legislation. NCWNZ holds the opinion that all buildings and facilities should be subject to inspection under the conditions of this Act and no loopholes provided.

NCWNZ is part of the NGO/ERMA consultative group and benefits from the information coming from this association. NCWNZ is appreciative of the efforts made by ERMA to engage public confidence and looks forward to this continuing. NCWNZ is pleased to have been given the opportunity to comment on this Bill as part of the ongoing public consultation on an important issue.

Barbara Glenie
National President

Barbara Arnold
**Convener,
Environment Standing Committee**