



## Proposal for EPA Notices for Hazardous Property Controls

Please submit your comments to [hsnotices@epa.govt.nz](mailto:hsnotices@epa.govt.nz) on this form in Word document format or mail to Private Bag 63002, Wellington 6140.

Submission on	Proposal for an EPA Notice for Hazardous Property Controls
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- ☐ I would like my submission (or specified parts of my submission) to be kept confidential, and attach my reasons for this consideration by the EPA.
- ☐ I would like my submission reported anonymously (i.e. without my name attached) by the EPA.

## Proposals and submission form

The EPA is seeking your views as interested parties on the proposals presented in the consultation document *Proposal for an EPA Notice for Hazardous Property Controls*.

The consultation document presents a number of proposals and poses a series of questions to help you frame your comments. Your feedback is important as it will enable the EPA to make more informed decisions on the content of the proposed notices. Please take this opportunity to have your say.

**Please use this form to submit your written comments and send it to [hsnotices@epa.govt.nz](mailto:hsnotices@epa.govt.nz) (in Word document format) no later than 5.00 p.m. Monday, 21 November 2016.**

The submission form brings together all of the proposals and questions asked throughout the consultation document in table format. Page references are provided to help you locate the relevant discussion as necessary.

When providing your comments, please provide your rationale and any information about the relative costs and benefits (financial or otherwise), and any other impacts of these proposals on businesses, workers or other stakeholders. This information will help us more fully understand the effects the notices would have if introduced as proposed.

Question #	Proposal / Question	Pg Ref
<i>Proposal 9 - Prohibition on application of class 9.1 substances directly onto, into or over water</i>		
Question 32	Do you believe that there should be a control in the HPC Notice that specifically prohibits the application of hazardous substances directly onto, into or over water?	64-66
	<p>Yes.</p> <p>The Drinking Water Standards of New Zealand prescribes Maximum Allowable Values for the presence of a number of hazardous substances that are harmful to human health. This includes a number of pesticides such as 1080.</p> <p>While the proposed control only applies to pesticides, Water New Zealand believes there may also be classes of herbicides that should be considered under this control. Determination of what substances require labelling should be referred to The Ministry of Health.</p> <p>We support the definition of water used in this document (which also includes underground water) however note that users of pesticides may face challenges identifying underground water sources and applying this control in practice.</p>	
Question 33	Do you think there should be a requirement for the product label to include, where relevant, a statement advising people to not apply substances onto, into or over water?	64-66
	<p>Yes.</p> <p>Having a label on the pesticide container will be a more effective prompt of the risks of applying pesticides to water.</p> <p>Currently identifying where pesticides pose risks to drinking water is difficult. Water operators are required to look through data sheets of pesticides to identify active ingredients and then compare those to the list of chemicals in the Drinking Water Standards, to identify if further testing of drinking water is required.</p> <p>In addition there have also been a few new pesticides introduced into the market since the development of the Drinking Water Standards were issued in 2008. Ensuring the product is labelled is a means of keeping track of the contamination risks posed to drinking water by new products.</p> <p>Most contractors applying pesticides won't be aware of the Drinking Water Standards, and by not advising of risks to Drinking Water users are unlikely to be aware a risk exists.</p> <p>The more warnings that exist, the better the risks to drinking water supplies can be managed.</p>	