

15 May 2019

Zach Powell
Ministry of Health
By email: zach_powell@moh.govt.nz

+64 9 476 7162
wasteminz.org.nz

Unit 2, 5 Orbit Drive
Rosedale 0632
PO Box 305426
Triton Plaza
Auckland 0757

Dear Zach

Consultation – notifiable blood lead level

Thank you giving WasteMINZ's Residential Lead Working Group the opportunity to provide feedback on the Ministry of Health's consultation document; *Proposal for reducing the notifiable level for lead absorption under the Health Act 1956*. The following feedback includes responses to the questions noted in this document, as well as further comments from the group.

Q1. Do you agree that the notifiable blood lead level should be reduced to 0.24 µmol/l?

We support lowering the notification level as it will assist in identifying children at risk of adverse effects of elevated blood levels and also potentially lead to further investigations of at-risk homes. We also support lowering the notification level to improve consistency with notification levels in Victoria and New South Wales and also the Australian National Health and Medical Research Council recommended level for further investigation.

Q2. If you do not agree, what level do you recommend, and why?

NA.

Other comments

We would like to point out that lowering the notifiable blood level may have an impact on Soil Contaminant Standards for lead in the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011. This regulation is administered by the Ministry for the Environment; and so, we would like to see consultation on this to include the Ministry for the Environment and its policy advisors. If the notifiable lead level is reduced; we would like to see the Ministry of Health working with the Ministry for the Environment to ensure a seamless follow-through of alterations through the various policy tools that protect communities from exposure to lead and other toxic contaminants.

Please contact me if you have any questions.

Kind regards,



Michelle Begbie
Chair – WasteMINZ Residential Lead Working Group
Michelle.Begbie@waikatoregion.govt.nz



About WasteMINZ: WasteMINZ is the largest representative body of the waste, resource recovery and contaminated land sectors in New Zealand. Formed in 1989, it is a membership-based organisation with over 1,000 members – from small operators through to councils and large companies.

WasteMINZ is the authoritative voice on waste, resource recovery and contaminated land in New Zealand and seek to achieve ongoing and positive development of the industry through strengthening relationships, facilitating collaboration, knowledge sharing and championing the implementation of best practice standards.

About the Residential Lead Working Group: The working group was established to encourage and facilitate information sharing and identify research needs relating to residential lead contamination arising from the use of lead-based paint. The group aims to engage stakeholders from a range of sectors, including health, environment and housing and encourage links between these sectors.