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<p>DZ 8510: 2017 Public Comment Draft</p> <p>Committee: P 8501</p> <p>Title: Testing and decontamination of methamphetamine-contaminated properties</p>	<p>Closing date for comment</p> <p>20 February 2017</p>	<p>Date of your comments</p> <p>20 February 2017</p>

Comment using this form is preferred in electronic format using Microsoft Word 97 or above, following the layout below. You can alternatively submit comments at the Standards New Zealand web site at <https://www.standards.govt.nz/developing-standards/comment-on-draft-standards/> in the 'New Zealand draft standards' tab, using the 'submit comments' button below this standard's entry.

The following form is for comments to be submitted electronically. Please email your comments to: SNZPublicComments@mbie.govt.nz

General comment

Regional Public Health (RPH) supports the need for more accurate standards for assessing methamphetamine contamination in properties. The application of a safe post-decontamination level should not be confused with a level at which it is safe or not safe to occupy a dwelling. The acceptable methamphetamine level in a standard must be interpreted alongside a health risk exposure assessment based on the likely source of the contamination and the level of potential exposure. This risk assessment will support a balanced evaluation of health effects and cost-effective decontamination process to adequately protect health, while avoiding unintended consequences. In particular, the costs of decontamination should be in proportion to the likelihood of human exposure and avoid unnecessary restrictions on availability of limited housing stock, which has the greatest impact on our vulnerable populations.

Specific comment

Please note that the proposal is to adopt the ISO standard ISO 10377:2013. Comments should focus only on the suitability for New Zealand of the standard, as the ISO standard itself is not intended to be altered.

We also encourage comments on ideas for additional supporting guidance material you feel would be of benefit to New Zealand business owners, to support those that wish to implement the practices of the standard within their own business

Clause No	Page No	Recommended Changes and Reason <i>Exact wording of recommended changes should be given</i>
1.1(b) and 1.2	9	<p>Scope and Objective</p> <p>Regional Public Health (RPH) supports the Scope Item 1.1 and Objectives 1.2 in the draft standard. However, there is a risk that without specific consideration of the likely exposure routes, the management of risk may not be proportionate to the potential health risks.</p> <p>RPH recommends that a Health Risk Exposure Assessment guide be developed to sit alongside the numerical standards, so there are appropriate measures to manage risks to health, well-being and safety.</p> <p>RPH suggests that Item 1.1 (b) should read as follows: “Measures appropriate to manage the level of risks to health (as determined by the guide to health risk exposure assessment), well-being, safety, and the environment from methamphetamine-contaminated material and chemicals used to manufacture methamphetamine;”</p> <p>RPH suggests that Item 1.2 should read as follows: “The objectives of this standard are to provide guidance on methodologies, procedures, and performance criteria aimed at ensuring the methods of testing properties provide reliable results, and the decontamination of contaminated properties is effective (and appropriately targeted to the assessed level of health risk),...”</p>
1.4	9	<p>Definitions</p> <p>RPH is concerned there is an insufficient explanation about the difference between a clan-lab and a non-clan-lab. RPH suggest that the definition of a clandestine laboratory should be expanded to be more specific.</p> <p>RPH suggests that the definition of Clan Lab under Item 1.4 Clandestine lab should read as follows: “a property or rooms that has been used for the illicit manufacture of methamphetamine and identified as a clan-lab by the NZ Police or other authorised agency, or confirmation of the presence of manufacture chemicals”</p> <p>To support this definition RPH have provided an additional recommendation around guidance to support identification of premises likely to have been associated with manufacture of methamphetamine (see next section).</p>

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C2.1	13-14	<p>RPH acknowledges the background information regarding the review of the ESR recommendations. However, we believe that the intent of the ESR guidance was not that the surface sampling is used to determine whether the property has been used for manufacture or not. What is required is a clearer definition of a Clandestine Lab (as per our previous submission point) and guidance on evidence of methamphetamine production. While a standard would be difficult to update as methods of manufacture may change, maintaining an up to date guide is more practicable.</p> <p>RPH recommends that there should be a guideline about the signs of methamphetamine contamination in dwellings if methamphetamine is manufactured using the two most popular methods. The literature shows dwellings are the most popular location (70%) for the manufacture of methamphetamine and current research indicates the two most popular manufacturing methods are red phosphorus and the Nazi/Birch method (Fowles, J. et. al.: 2016). This information could also describe the other hazards associated with the manufacture of methamphetamine.</p>
C2.2	13	<p>Options for methamphetamine residue clean-up levels</p> <p>RPH notes that both option A and B have some limitations. Option A relies on knowledge of the source of contamination, with extra caution applied when there is evidence of manufacture. Option B does not require a decision to be made on the source of contamination, but would lead to a higher level of decontamination being undertaken (e.g. removal of soft furnishings) even without evidence of manufacture. The majority of the burden is likely to fall on already vulnerable populations, such as those in social housing. The health impact of being displaced from housing is significant. This is in comparison to very little chance of health effects from being exposed to methamphetamine residue.</p> <p>Option B could also be associated with the reverse risk - that is, the level is used to determine there is no need for action, when in fact manufacture has occurred on the premises and the hard surfaces level would not reflect the potential risk from retention of contaminated soft furnishings. We note that the post clean-up level of 1.5ug/100cm² recommended by the California Department of Toxic Substances Control is specifically aimed at known clandestine laboratories and assumes removal of soft furnishings such as carpet.</p> <p>RPH prefers “Option A” that describes the three-level decontamination approach for a property contaminated with methamphetamine residues. This allows for the highest risk properties i.e. those known to have been clandestine labs, to have a more stringent clean-up standard without the need for costly testing in addition to costly decontamination measures. This is balanced with the majority of properties being unlikely to present a risk of exposure to chemicals of manufacture, and therefore cleaning methods alone being sufficient decontamination measures.</p>

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2.3.1, 2.3.2 & Fig 1	16 & 17	<p>Limits in this standard and process</p> <p>RPH agrees with the requirements written in this section; however, RPH recommends that two additional steps are added to the process.</p> <p>First, a property should, as suggested in Item 1.4 be officially deemed a clan lab by the NZ Police or other authorised agency or via presence of manufacture chemicals (as per our recommendation of developing a guide), and secondly a health risk exposure assessment should be part of the pre-decontamination assessment (as per our recommendation of developing a guidance document).</p> <p>Item 2.3.2</p> <p>RPH is concerned that a compliance report will be issued at the level of 1.5ug/100cm² even when known to have been a site of manufacture. As previously outlined, this could present a risk from retention of contaminated soft furnishings. Our understanding is that acceptance of a post-decontamination level of 1.5ug/100cm² assumed the soft furnishings (carpet) had been removed.</p> <p>RPH recommends that the words “health risk exposure assessment” is added into the first box in Figure 1 – Actions for known or suspected clandestine lab on Page 17.</p>
2.3.3 & Fig 2	18 & 19	<p>RPH would like to reinforce that this section only applies to properties that have a specific assessment determining that the source of any methamphetamine contamination is unlikely to be as a result of manufacture. We acknowledge that although not all places of manufacture can be identified, that the majority of positive tests will represent contamination from use only. It is still important that the first step for screening is a review of the evidence for likelihood of manufacture, and that some guidance is produced to support this assessment. This step should then be added to the flowchart Fig 2 “Actions to determine methamphetamine contamination in properties”</p>
3.1	20	<p>Item 3: Contamination Level Assessment</p> <p>It is important that the contamination level assessment also includes consideration of the level of likely exposure – that considers not only the number of rooms where contamination is detected but also who is likely to be exposed and how (a health risk exposure assessment). This will then help guide decisions, alongside the environmental testing results, for the required extent of decontamination. RPH recommends that a health risk exposure assessment guide is developed to sit alongside the standard.</p>
3.1.1 & 3.1.2	20	<p>Contamination-level assessment purpose and contamination-level assessment phases</p> <p>RPH agrees that there should be phases of assessment and that characterisation of clan labs, presence/absence, and laboratory testing, establishing the extent and magnitude of the contamination, the design of any decontamination works and waste disposal plan and post-decontamination assessments are all suitable steps.</p>

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		RPH suggests a health risk exposure assessment will inform and compliment these phases.
3.2.5 & 3.3.6	22 & 25	<p>Items 3.2.5 & 3.3.6: Recommendations on next steps</p> <p>RPH notes that recommendations on next steps may be included in a compliance report but are beyond the scope of the standard. In our experience, such recommendations on laboratory reports can cause unnecessary anxiety. Introducing a simple health risk exposure assessment prior to testing can help tailor any recommendations provided, so they are proportionate to the likely level of exposure and who is at risk of exposure.</p>
4	27	<p>Decontamination should be tailored to the amount of exposure – specifically who is exposed, how, and for how long (e.g. with more than one contaminated room within a house, an individual is likely to have a longer period of exposure). RPH recommends that the Objective of decontamination includes this consideration to avoid unnecessary costly decontamination or impacts on housing availability.</p> <p>RPH recommends that the inclusion of a health risk exposure assessment in the pre-decontamination report will then inform the scope of work for the decontamination process. In particular this will inform item 4.3.4.1 Removal and Disposal (page 28), which as written implies that all soft furnishings will be removed. With Option A this will depend on the likely source of the contamination (i.e. evidence of manufacture or not). It can also be informed by the health risk assessment exposure, so that the level of decontamination is proportional to the potential risk.</p>
5.3, 6.4 & 6.5	32, 34 & 35	<p>Items 5.3, 6.4 and 6.5: Qualifications, accreditation and experience of testers, laboratories and decontaminators need.</p> <p>RPH agrees with statements in Item 5.3 and 6.4 that the provider of the investigation, sampling and testing should be ISO accredited and separate from people or organisations providing the decontamination to avoid any potential conflict of interest.</p> <p>RPH also agrees with the items under 6.5, that there should be a competency level and code of ethics for decontaminators, as this will prevent any conflicts of interest.</p> <p>RPH recommends that Worksafe NZ could publish/display an approved and accredited list of ‘field screening technology testers and laboratories on their website in the same way it lists certified asbestos removers - http://www.worksafe.govt.nz/worksafe/information-guidance/guidance-by-hazard-type/asbestos/licensing/documents-and-forms/certified-asbestos-contractors.pdf/view</p>