



26 February 2016

Trade Waste Bylaw Review
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WELLINGTON
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PROPOSED WELLINGTON CITY COUNCIL TRADE WASTE BYLAW 2004 - REVIEW 2015

Regional Public Health (RPH) serves the greater Wellington region, through its three district health boards (DHBs): Wairarapa, Hutt Valley and Capital & Coast and is based at the Hutt Valley DHB.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff include a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

RPH supports the use of the trade waste bylaw as a means of controlling discharges to the councils' waste water system to protect public health. This bylaw also protects the wastewater system, system workers and the environment.

While we recognise that a trade waste disposal system is an essential public good it is also true that uncontrolled discharge of trade wastes have the potential to affect peoples health and safety and that of the environment, corrode or block sewer pipes, create odours and place extra demands on wastewater treatment processes.

RPH supports the creation of clearer regulation to improve compliance, and also the beginning of a more consistent approach to improve trade waste management.

RPH supports the move to promote cleaner waste production to reduce levels of sewer system blockages. This will in turn lower levels of exposure of the public who swim at affected beaches or gather seafood to contaminants.

We make the following submission on the proposed bylaw:

Liquid waste from pharmacies is generally product that has been returned by customers to pharmacies in accordance with the Health and Disability Services Standards – Pharmacy Services Standard NZS 8134.7:2010. RPH submits that the bylaw attribute a 'prohibited' grade to cytotoxic waste, and that controls be placed on the disposal of liquid antibiotics.

Although NZS 304:2002 Management of Healthcare Waste currently states that cytotoxic waste can be discharged to a sewer with the local authority's permission, this is no longer considered appropriate.

In addition, RPH supports the advice of the Pharmacy Guild of New Zealand that the amount of liquid pharmaceutical waste discharged monthly will not exceed the following volumes and concentrations of active ingredients:

Volume Limit	Active Concentration
10 Litres	125mg / 5 ml
5 Litres	250mg / 5 ml
3 Litres	Above 250mg / 5ml

Any discharge above these limits should be a controlled grade discharge and require a trade waste agreement.

I do not wish to be heard in support of this submission.

Please contact Mike Fisher Health Protection Officer on (04) 570 9322 or by email (mike.fisher@huttvalleydhb.org.nz) if you wish to discuss any aspect of the Bylaw further.

Yours sincerely



Dr Stephen Palmer
Medical Officer of Health
Regional Public Health