

The Moanataiari Project

Here's a summary of the Moanataiari project to help our communities put the risk at Moanataiari in context and to help explain the common-sense approach we need to take.

The History

The Coromandel is a highly mineralised area due to ancient volcanic activity; our towns were founded by the pursuit of gold. Where there's gold there's also elevated levels of things like naturally occurring arsenic and lead!

Between October 2011 and June 2012 soil tests on public land and private property

at Moanataiari revealed elevated levels of these and other elements.

Moanataiari is built on reclaimed land from highly mineralised rubble and old (unprocessed) mine works from behind the hills of Thames and reflects the geodiversity of the local environment.

Risks at Moanataiari are tiny

Should we spend millions to reduce the average additional risk by 0.00136%?

A Health Risk Assessment was undertaken at Moanataiari, which found that the additional risk (above government policy) of developing cancer from a lifetime of exposure to soil at Moanataiari is on average only 0.00136%

TCDC believes that spending millions of dollars to remediate the soil in order to comply with government policy is NUTS.

The Health Risk Assessment was peer reviewed three times, by international scientists and experts, an independent quality assessor and the Ministry of Health.

Moanataiari Governance Group decision

To manage the very small risk to health from exposure to naturally occurring minerals in the soil, by a majority, the Project Governance Group approved the TCDC recommendation to implement a "non-physical" approach (not digging out

and dumping soil). Most of the properties on the western side of the sub-division will drop out of the project after the investigation discovered no increase in additional health risk.

The current health advice is good advice wherever you live: don't consume soil.

Ministry and regional council pull out

The Ministry for the Environment and regional council have terminated their involvement in the project after disagreeing with the Governance Group decision.

They think we need to do more work on the science and cost-benefit analysis. We think spending \$700,000 on the project is enough and has bought us the best science.

Read their letters and our replies at www.tcdc.govt.nz/letters to find out more or you can request copies on 07-868-0200.

The project will continue without them and a working group will be set up to implement the 5 December decision.

www.tcdc.govt.nz/letters

In summary:

The risks at Moanataiari are less than tiny and life should return to normal as fast as possible: simply follow good hygiene practices and avoid eating dirt.

TCDC will not spend millions of dollars of public money remediating nature to reduce such a minute risk; much of the Coromandel is similar geodiversity (minerals etc).

The 3 agencies have spent \$700,000 buying the best international science, which has been peer reviewed three times and so we are confident we're spot on with the "non-physical approach."

The NES is poor policy and needs to be reviewed urgently - it's overly conservative and hard to apply to areas higher in natural mineralisation.

Major concerns with the National Environmental Standards (NES)

The new NES has been the underlying driver behind the inception of the project by the regional council. We have major concerns with this poor piece of policy work.

Policy disconnect

There is a significant disconnect between Government policy and the NES. New Zealand Government policy sets the acceptable level of increased risk at 1-in-100,000. But the NES soil contaminant standard for arsenic does not correlate with this government policy.

Lack of international peer review

It is not correct that the NES has been internationally peer reviewed, as is commonly understood to be the case. Toxicological draft reports that underpin only one of two NES foundation documents were peer reviewed by two leading international toxicologists. However, the same policy robustness was not extended to the other key document. This inconsistency is not openly discussed and has not been satisfactorily explained.

Lack of coordination between teams

During its development, there were two teams respectively working on the technical and policy aspects of the NES. There is concern that there was insufficient coordination between teams that, for example, may have led to the policy disconnect described above. Enquires to the Ministry for the Environment confirm that there exists no minutes or similar documentation that would document

adequate coordination between the teams.

The NES is based on science that should have been better

When challenged in a meeting over a key NES assumption, the response was "we know it's wrong, but we don't have better science".

It is not that the Ministry for the Environment did not have available to it better science. Rather, in the development of the NES, it appears that the Ministry chose not to spend time and money sourcing the better science it needed.

As early as May 2009, through a letter from leading international toxicologists, the Ministry was advised that better science was needed in relation to oral bioavailability.

Better science did indeed exist, and it was needed; this is evident by the unfortunate fact that this Moanataiari project ended up having to commission and pay for it.

Cost benefit

Ministry for the Environment Officials made quite an effort to discredit the cost benefit analysis that was presented to the 5 December Moanataiari Governance Group meeting; yet they had the temerity to not present

to the meeting any alternative analysis.

This is despite the fact that Cabinet papers refer to (but do not include) a detailed cost benefit analysis prepared by independent consultants at the time of the NES' development.

Our reading of the advice given to Cabinet is that the nationwide and potential site-specific costs and impacts were estimated to be less than \$1 million. This would be at odds with one scenario for Moanataiari alone which put the cost between \$3 million and \$10 million.

We have asked Officials for comment on our reading of the advice given to Cabinet

What happened to the National List of Contaminated sites?

We were told by the regional council and MfE staff that a national list of contaminated sites was being released in 2011 and Moanataiari was on this list. Because of this information we launched the Moanataiari investigation but the list was never made public!

Our request of October 2012 to the Ministry for the Environment for the national priority list of contaminated sites was denied in order to protect free and frank expressions of opinions between Officials and Ministers, but what we have requested is simply a list.

We have referred the Ministry's decision to withhold the list to the Office of the Ombudsman.

Hamilton water supply delivers arsenic dose up to twenty times higher

TCDC has uncovered a major policy disconnect between water standards and the soil standards and has asked Minister for the Environment, Amy Adams to investigate.

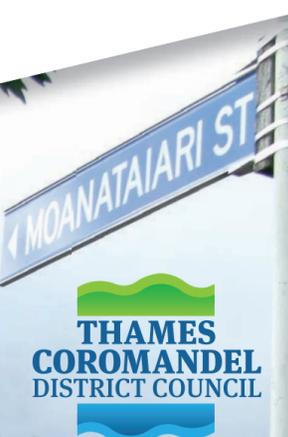
Assuming a 2L-per-day consumption, naturally occurring arsenic in the Hamilton City water supply delivers more than seven times the daily dose of arsenic to Hamilton adults than is obtainable from the remediation target insisted upon by Ministry for the Environment Officials for Moanataiari.

But the situation is more concerning than this for children; for children, the arsenic dose from just 1L-per-day of Hamilton water is around twenty times that which is obtainable from the remediation target at Moanataiari.

It appears to us that, with regard to arsenic, the threshold for soil is around 33 times more onerous than it is for water. This circumstance will cause avoidable stress and cost to communities up and down the country, beyond Moanataiari, as Ministry for the Environment Officials continue to hold their line with impractical zeal.

We believe that that discrepancy must be urgently addressed by the Ministries.

Read the letter sent to the Minister at: www.tcdc.govt.nz/letters



visit www.tcdc.govt.nz/moanataiari for more