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Minister Responsible for Housing New Zealand
Minister for Social Housing

Upcoming public consultation on development of standard for testing and remediation of methamphetamine contamination in residential properties – Housing New Zealand comment

This paper provides you with Housing New Zealand's comments on the public consultation on the proposed standard for testing and remediation of methamphetamine contamination.

Overview

Housing New Zealand is taking part in the "Methamphetamine Testing and Remediation Standards Development Committee (P 8510)" administered by the Ministry of Business, Innovation, and Employment in conjunction with the Ministry of Health (MoH) and other departments and industry experts. This committee was established in May 2016 to address a need for guidance on methodologies, procedures, and other supporting material that will ensure a consistent and effective approach to managing, testing, and remediation of contaminated properties. This committee will establish a new standard which will inform what level of contamination is considered safe in homes.

Interim contamination guideline

The MoH asked the Institute of Environmental Science and Research (ESR) to conduct a review of the threshold within the current guidelines. On 27 October 2016 the recommendations of this review were released and were endorsed by MoH for use as an interim guideline until the final standard is established in early 2017. The interim guidelines are:

- 0.5 µg/100cm² for houses where the drug has been manufactured (unchanged)
- 1.5 µg/100cm² for houses where the drug has only been used – where soft furnishings remain (for example, carpet)
- 2.0 µg/100cm² for houses where the drug has only been used – where soft furnishings have been removed.

Draft standards and public consultation

The Committee agreed to include the above guidelines in the public consultation document. However, some members of the Committee raised concerns around the three-level guidelines. These included that it is difficult to distinguish whether the contamination is from manufacture or use, and that it is difficult to remove contamination from soft furnishings.

In response to this, the Committee decided to include a second option, which includes a single guideline for all properties contaminated by methamphetamine. The Committee intends to consult the public on the following two options:

- *Option one:* Retain the current MoH recommended interim guidelines, as outlined above. These are consistent with the recommendations in the ESR report.
- *Option two:* A single level of clean up for all sources of methamphetamine contamination (including P labs) of 1.5 µg/100cm² and a separate level for limited exposure areas (such as roof and crawl spaces) of 4.0 µg/100cm².

We understand that the Committee is looking to release the draft standard for public consultation on 9 December 2016.

Implications for Housing New Zealand

Business implications

Operationally, a single-level guideline of 1.5 µg/100cm² would be simpler to implement, as properties could be tested and remediated to one level, regardless of whether the property was contaminated due to manufacture or use, or whether or not the property has soft furnishings. This would create clarity for Housing New Zealand staff and our contractors and provide clear guidance as to what is considered safe in our properties.

Reputational risks

Housing New Zealand has identified the following reputational risks to the proposed standards.

- The ESR report represents the most up-to-date, international research on the topic of methamphetamine contamination and its health affects. The adoption of a standard that differs from this would alter the exposure rate of methamphetamine residue for our tenants. Housing New Zealand has been under significant public scrutiny for its application of MoH's guidelines in the past, and the perception that there is no scientific basis for testing to these.

For example, there is no scientific consensus on whether a level of 1.5 µg/100cm² where methamphetamine has been manufactured is safe. The ESR report recommends properties where manufacture took place be decontaminated to 0.5 µg/100cm².

- Under the ESR recommendation of 2.0 µg/100cm² for houses where the drug has only been used, and where soft furnishings remain, it is unclear whether or not cleaning carpets is sufficient, or if they should be removed. The recommendations are silent on this distinction. There could be a perception that Housing New Zealand would be misapplying the guideline and is not adequately safeguarding the health and safety of its tenants

Costs

Housing New Zealand will incur slightly increased costs if the guideline were to change to a single level of 1.5 µg/100cm². Following the release of the interim guidelines, Housing New Zealand began testing properties to 2.0 µg/100cm² where soft furnishings have been removed.

Approximately six percent of properties that tested positive for contamination would be affected by a single-level guideline. To decontaminate these properties to 1.5 µg/100cm² could cost an additional \$370,000 per year.

Territorial Authorities

There has been concern raised by Local Government New Zealand that there is a risk that councils may adopt different contamination levels in the future (the adoption of the MoH standards vs. those that are recommended by the Committee next year). If this were to occur, Housing New Zealand would be required to operate differently in different parts of the country. This could create significant challenges for Housing New Zealand operationally, including with its staff, contractors, and local stakeholder relationships.



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