



April 18, 2018

Chris Ryan  
Waitomo District Council  
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Dear Chris

### Feedback for your Long Term Plan

As many territorial and regional councils throughout New Zealand are currently consulting on their Long Term Plans, I wanted to take the opportunity to remind councils of their obligations under the Hazardous Substances and New Organisms Act 1996.

Please consider these obligations whenever you are reviewing your plans and prioritising your activities.

Collectively, and alongside regional councils, New Zealand's 67 territorial authorities are our biggest field force of hazardous substances enforcement officers outside workplaces – responsible for hazardous substance compliance and enforcement in every public and private location within their boundaries, in situations not controlled by other agencies.

There are significant environmental and safety risks of not adequately resourcing these responsibilities.

I appreciate the difficulty in quantifying the size and potential impact of the risks, and the challenge of competing resources. Hazardous substances, however, span all of the outcomes that many councils already focus on – such as water quality, air quality, and sustainable resource management. Rather than address hazardous substance enforcement in isolation, you could consider improvements in relation to the other environmental and economic outcomes you are working towards. This might include, for example, distributing public education material on hazardous substance safety to your ratepayers, and/or you might decide to fund an in-house hazardous substances expert to support your enforcement staff.

Thank you for the role you play in safeguarding the health and safety of New Zealand's people and environment.

Yours sincerely

Allan Freeth  
Chief Executive