

Proposed risk assessment methodology for hazardous substances

Submission Reference no: 3

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Overall Notes:

Clause

1. Is the level of detail appropriate? (please reference page numbers as appropriate)

Position

Yes

Notes

People are becoming more concerned about our impact on the environment and are starting to prefer a more sustainable and interactive approach in preference to invasive and manipulative initiatives. It would be a very good idea to survey public opinion more widely to determine whether or not the ongoing and increasing use of poisons and "inorganic " methods and products are favoured or disapproved of.

Clause

2. Are there any areas that you would like more information on? (please reference page numbers as appropriate)

Position

Yes

Notes

There is a growing awareness that ongoing exposure to subclinical doses of hazardous substances can have adverse long term effects on health. Are well constructed and administered Epidemiological studies a part of the proposal?

Clause

3. Is the level of detail appropriate? (please reference page numbers as appropriate)

Position

No

Notes

I would suggest that the well known and well respected PRECAUTIONARY PRINCIPLE should be the preeminent consideration and that economic cost benefit analyses should be the least influential factors influencing decisions.

Clause

5. Are there any areas that need more guidance? (please reference page numbers as appropriate)

Position

Yes

Notes

There are already many concerns that the exploitation of our environment for financial gain is excessive and that the regulations that are meant to protect the environment and the people are not properly enforced. Making rules that are not rigidly enforced is a form of deception and false reassurance that hazardous substances are not being used irresponsibly.

Clause

6. Are there any other matters that should be addressed as part of this methodology? (please reference page numbers as appropriate)

Position

Yes

Notes

The methodology should be based on the precautionary principle and the clear understanding that we are here to preserve our environment for the benefit of future generations and not for the short term benefits of those with vested financial interests who wish to irresponsibly exploit and pollute it for their personal benefit.

Clause

10. Are the requirements practical and achievable? (please reference page numbers as appropriate)

Position

No

Notes

There are probably already too many potentially harmful and hazardous substances in our environment and more effort should be made to reduce rather increase the numbers. Given the vast numbers of poisonous substances in use and the difficulties in enforcing all the regulations there are bound to be regrettable consequences in the future.

Clause

11. When used in conjunction with the external guidelines for each model, is any further clarification required to be able to perform a risk assessment? (please reference page numbers as appropriate)

Position

No

Notes

Risk assessment is a way to predict future events and human beings are notoriously bad at doing that. If one does not expect the unexpected then there will be cause for regrets.

Clause

12. Are the parameter values used by the EPA relevant and correct? (please reference page numbers as appropriate)

Position

No

Notes

Too much emphasis on economics and not enough on sustainability and preservation of the balance of natural species and processes. We are meddling with systems that are so complex and interactive that we cannot hope to predict the consequences. Better to reduce our human interference before the environment and nature decided to dispose of our species.

Clause

13. Are the models used by the EPA relevant and correct? (please reference page numbers as appropriate)

Position

No

Notes

I tend to think that there is too much reliance placed on information provided by people with vested financial interests (from within and outside of our government). Decisions should only be based on evidence and opinions obtained from totally independent and unbiased scientists. Since this is very difficult to achieve all evidence and opinions should be regarded as potentially biased and invalid. If there is any doubt at all then the decision should be NO.

Clause

14. Are there any alternate models that the EPA could consider? (please reference page numbers as appropriate)

Position

Yes

Notes

A model that is based on reducing the reliance on and proliferation of invasive measures and promotes a shift to organic agriculture and less interventions.

Clause

7. Are there alternative groundwater models that the EPA could consider as part of a revised groundwater risk assessment framework?

Notes

The effects of current activities on future quality of groundwater are very difficult to predict. Changes in the quality and quantities of groundwater seem to be very unpredictable and evolve over longer time periods. Adverse effects are also difficult to predict or accurately monitor and are most likely to be exceedingly difficult and costly to remedy once they have been identified. Please err totally on the side of caution.

Clause

I would like my personal information (other than my name) to be withheld from any publicly available response documents.

Position

No

Notes