

Dell Hood

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Hamilton

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ERMA Review of 1080

Submission of the Society of Medical Officers of Health

Matters pertaining to conflict of interest:

Dr Deborah Read, Medical Officer of Health, Wellington is a member of ERMA. She has taken no part in the preparation of this submission, including the discussions prior to its writing.

I was appointed as a member of the Conservation Board for the Waikato Conservancy of the Department of Conservation in October 2006. I have attended 2 meetings to date. The use of 1080 has not been discussed by the Board during my time as a member. The Board's role is advisory, not governance, and it takes care to avoid engagement with operational matters.

This presentation is made on behalf of the Society of Medical Officers of Health representing all Medical Officers of Health. As a group we support the continued use of 1080 for pest control. We do not wish to see any reduction of the current controls on its use.

Points for verbal submission

1. The role of public health in providing independent health oversight of all operations using 1080 is well established, and has been deemed of sufficient importance to be not only retained but strengthened in the Hazardous Substances and New Organisms Act (HSNO). Medical Officers of Health and Health Protection Officers who have completed specific training and are warranted as HSNO enforcement officers must review all applications and can impose conditions necessary to protect the health of the public. The Ministry of Health drew up model permit conditions in 1995 and these are still in use. Under the new legislation, health approval can be declined on public health grounds.

2. The competence and professionalism of contractors delivering all VIAs has a major bearing on maintaining public safety. The best safeguard for human health is in my opinion, well trained, experienced operators who understand the risks of their work. The progressive implementation of the provisions of the Hazardous Substances and New Organisms (HSNO) legislation has been confusing and slow, but has in my experience, lifted the standard in the pest control industry. In particular, small time and casual operators have in most cases been excluded by their inability to comply with the more stringent legislative requirements.

Good operators set and demonstrate compliance with high internal standards as well as legislation, and respect the potential for harm from the toxins they apply, to their staff, the public and the environment. In this regard, 1080 and other VIAs are and should be no different from the numerous other toxic and persistent agents widely used in society, for example petroleum products. Good operators are also well informed partners with Public Health Services in identifying and mitigating public health risks.

Our group encourages the Authority to identify high performing operators and to support others to attain and maintain high standards of practice. This is one of our most powerful strategies to protect the public.

3. We ask the Authority to give serious consideration to the health implications of the increase in use of other VIAs were 1080 to become more restricted. Cyanide and phosphorus paste have very high potential for causing serious injury and death to operators and to the public, particularly as these chemical injuries would most frequently occur in isolated areas remote from medical assistance.

Cyanide in particular can be rapidly lethal, and it is of note that there are no “model conditions” for its use in pest control. This risk of accidental poisoning has been reduced considerably with the introduction of encapsulated cyanide, but simple cyanide paste remains available, and the toxin can be retrieved from within the pellet if anyone seeks to use it to cause intentional threat or harm.

4. Whilst most human tuberculosis in New Zealand is caused by the human strain *Mycobacterium tuberculosis*, there are still around 5 cases of human illness due to the bovine strain *M. bovis* annually. Some of these will be activation of previously latent infection acquired many years earlier but even if only one or two cases annually are new infections with the bovine strain, then that is a serious health concern. Human strain tuberculosis requires a minimum of six months’ treatment with at least 3 drugs in the first 8 weeks, but the bovine strain requires more complex and usually longer treatment as it is characteristically resistant to at least one of the standard antituberculous drugs.

Control of possums therefore contributes to reducing the risk to humans from infection and disease from the bovine strain of tuberculosis.

5. There are wider health concerns that would arise were 1080 to be less available. The links between a healthy environment and human health are not immediately obvious but degraded environments are associated with health risk and adverse health outcomes. From my own experience in Waikato District Health Board, I have seen severe physical, economic and social harm result from flooding and silting, erosion and landslides (the “weather bomb” in Thames Coromandel is a graphic example). There is eutrophication of our waterways, increasingly frequent cyanobacterial blooms, reduction in the volume and quality of source water for drinking water supplies, and contamination of kaimoana. Loss of biodiversity leaves the way open for new and harmful species to become established. These events affect entire communities, not just individuals, and their negative impact is typically long lasting. We ask the Authority to include these wider health impacts as well as those related to direct effects of VIAs.

6. Much of the land where 1080 is applied by air cannot realistically be treated by ground based methods for physical as well as economic reasons. Inadequately controlled pests in the most inaccessible country will rapidly reinvade other adjacent land. This physically rugged and or remote land must be managed if pest numbers are to be kept to levels at which the worst environmental damage is mitigated. Such areas are typically the headwaters of our major river systems, which are important sources of drinking water and recreational resources downstream.

Conclusion

In a perfect world there would be no need for the widespread use of toxic substances in our environment but given the imperfections of our current environment, the use of 1080 is in our collective opinion, a reasonable approach, provided it is used with strict adherence to scientifically based controls, with independent health oversight and with demonstrably careful and responsible stewardship throughout the process.

Dell Hood
on behalf of the Society of Medical Officers of Health