

Submission

to

Standards New Zealand

on the

Draft standard on testing and decontamination of methamphetamine- contaminated properties

16 February 2017

About NZBA

1. NZBA works on behalf of the New Zealand banking industry in conjunction with its member banks. NZBA develops and promotes policy outcomes that contribute to a strong and stable banking system that benefits New Zealanders and the New Zealand economy.
2. The following sixteen registered banks in New Zealand are members of NZBA:
 - ANZ Bank New Zealand Limited
 - ASB Bank Limited
 - Bank of China (NZ) Limited
 - Bank of New Zealand
 - Bank of Tokyo-Mitsubishi, UFJ
 - Citibank, N.A.
 - The Co-operative Bank Limited
 - Heartland Bank Limited
 - The Hongkong and Shanghai Banking Corporation Limited
 - Industrial and Commercial Bank of China (New Zealand) Limited
 - JPMorgan Chase Bank, N.A.
 - Kiwibank Limited
 - Rabobank New Zealand Limited
 - SBS Bank
 - TSB Bank Limited
 - Westpac New Zealand Limited.

Background

3. NZBA welcomes the opportunity to provide feedback to Standards New Zealand (**Standards NZ**) on the draft standard on testing and decontamination of methamphetamine-contaminated properties (**Standard**), and commends the work that has gone into developing it.
4. If you would like to discuss any aspect of the submission further, please contact:

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Support for the Standard

5. NZBA supports the introduction of the Standard as it should provide greater protection for the general health of members of the public. The Standard should also engender greater assurance and certainty for property owners (including vendors and buyers), and should also benefit banks and lenders via improved information being available to mortgage borrowers.

Consultation with technical subject matter experts

6. NZBA supports the implementation of a New Zealand standard that reflects a conservative and best practice approach to testing and decontamination of methamphetamine contaminated properties, with a minimum residual safe level reading. NZBA would encourage ongoing consultation with technical subject matter experts to ensure the Standard addresses the practical challenges of determining whether methamphetamine has been manufactured or used in a property.

Options presented for clean-up

7. NZBA and its members do not have the technical expertise required in order to express an informed preference for either option A or option B for clean-up. However, from a practical perspective some of our members would note that having one limit apply to all living areas within a dwelling regardless of the source of contamination appears preferable. Assessing whether contamination arose from a clandestine lab or ongoing use can be difficult in practice and having one limit to apply should reduce uncertainty.

Samplers, testers and decontaminators

8. NZBA and its members support having training and accreditation programmes for samplers, testers and decontaminators.
9. The requirements that conflicts of interest by those who screen/sample contamination be disclosed, and that party should be independent from the decontamination contractor is in our view prudent and is also supported by NZBA and its members.