



## Office of Hon Peter Dunne

MP for Ohariu  
 Minister of Internal Affairs  
 Associate Minister of Health  
 Associate Minister of Conservation

- 2 JUL 2015

Ms Jill Mortimer  
 Contract Administrator  
 Queenstown Lakes District Council  
 jill.mortimer@qldc.govt.nz

Ref. 1530117

Dear Ms Mortimer

Thank you for your email of 28 May 2015 and the attached copy of the proposed Trade Waste Bylaw for Queenstown Lakes District Council.

The Ministry of Health supports the use of trade waste bylaws as a means of reducing waste to councils' sewage treatment plants. These bylaws also protect the sewerage system, sewerage workers and the environment. I am advised that Queenstown Lakes District Council's Trade Waste Bylaw is comprehensive and largely follows the requirements set by the New Zealand Standard (NZS) Model Bylaw for Trade Waste, and exceeds the requirements in places.

Ministry of Health officials have asked me to draw to the Council's attention the disposal of liquid waste from pharmacies. These are generally products that have been returned by customers in accordance with the Health and Disability Services Standards – Pharmacy Services Standard NZS 8134.7:2010. However, Ministry officials also recommend that in the Schedules of your Bylaw, cytotoxic waste is prohibited and controls are placed on the disposal of liquid antibiotics. Although NZS 304:2002 Management of Healthcare Waste currently states that cytotoxic waste can be discharged to a sewer with the local authority's permission, this is no longer considered appropriate. When this Standard comes up for review, the Ministry will seek to have this advice amended.

Ministry officials recommend including a provision prohibiting the discharge of any pharmaceutical liquid waste containing cytotoxic ingredients. In addition, they support the advice of the Pharmacy Guild of New Zealand that the amount of liquid pharmaceutical waste discharged monthly will not exceed the following volumes and concentrations of active ingredients:

Volume Limit	Active Concentration
10 Litres	125mg / 5 ml
5 Litres	250mg / 5 ml
3 Litres	Above 250mg / 5ml

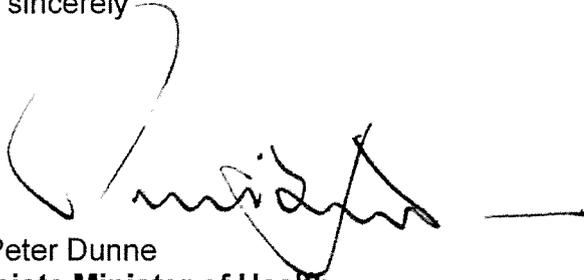
Any discharge above these limits should be a controlled discharge and require a trade waste agreement.

Finally, Health officials advise me that the radiation regulatory body has changed from the National Radiation Laboratory to the Office of Radiation Safety. As such, in Schedule 1A, Section 1A.2.7 should refer to Office of Radiation Safety guidelines. ]

In accordance with section 148(4) of the Local Government Act 2002, I do not have any representatives of the owners or occupiers of trade waste premises that I require you to consult with, as I note you have already consulted extensively with these groups.

Additionally, you can contact Mr Paul Prendergast (Public Health Engineer, Environmental and Border Health) at the Ministry on (04) 816 2672 or by email ([paul\\_prendergast@moh.govt.nz](mailto:paul_prendergast@moh.govt.nz)) if you wish to discuss any aspect of the Bylaw further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Dunne', with a horizontal line extending to the right.

Hon Peter Dunne  
**Associate Minister of Health**