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Environmental Protection Authority

By email: hsnotices@epa.govt.nz

Tēnā koutou

Proposal for an EPA Notice for disposal of hazardous substances

The New Zealand Nurses Organisation welcomes the opportunity to comment on the above proposal. We have consulted with staff and members, particularly members of the Infection Prevention and Control Nurses College (IPCNC) and the Cancer Nurses College (CNC), and professional nursing, industrial and policy advisers. I have also had a brief discussion with Peter Dawson, Principal Scientist Hazardous Substances at Environmental Risk Management Authority New Zealand and taken his advice in alerting you to some related issues concerning hazardous waste disposal.

Nurses come into contact with hazardous waste in a number of ways, but are particularly concerned with antineoplastic medicines containing cytotoxic substances, which are not classified as hazardous, but do present an occupational hazard to workers who are constantly exposed to them, and with the safe disposal of hazardous and infectious material in hospitals. We are concerned because, despite the known risks and NZNO's advocacy, anti-neoplastics are still not included in regulations covering hazardous substances; and, with regard to hospital waste, we are not sanguine that management systems are as efficient, integrated or 'green' as they could and should be.

NZNO has supported IPCNC nurses membership and attendance of the joint Australia New Zealand Standards Committee for the Management of Hospital Waste. Their experience has been that the Committee is Industry and Australian dominated, and that they have often been a lone voice in advocating systems appropriate to Aotearoa New Zealand hospital environments. We note that many comparable OECD countries have been proactive in moving towards integrated, sustainable waste management systems, eg the .UK's Green Healthcare Programme includes many best practice guides for improving the management and reduction of hospital waste. We suggest this proposal should be part of a similarly focused and nationally coordinated approach to the management of hazardous waste.

Finally, we note that there has been no update of the Management of Health Care Waste Standard since 2002. Accordingly we recommend that this is updated; that antineoplastics and their disposal are regulated as hazardous substances; and that consideration is given to ensuring sustainable, integrated hazardous waste disposal.

We trust the above is useful and would be happy to elaborate if required.

Nākū noa, nā



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NEW ZEALAND NURSES ORGANISATION (NZNO)

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 47,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse*.