*With respect to DZ8510 - NZS8510 - Testing and decontamination of methamphetamine-contamined properties, the Auckland Property Investors’ Association submitted the below on 5th February 2017 through https://shop.standards.govt.nz/default.htm?action=viewDraft&mod=drafts&draftId=DZ+8510.*

**GENERAL COMMENTS**

The Auckland Property Investors' Association ("APIA") is supportive of the creation of standards for meth testing and decontamination being put in place and submits the following comments to the Standards committee:

1. With respect to the matrix of three levels of contamination and clean up, the APIA wishes to stress the importance of streamlining and simplifying the standard to avoid confusion, dispute, and promote compliance.;

2. The APIA believes strongly that the Central Government, not local authorities, should set and govern the standards as to not discriminate the health and wellbeing of New Zealanders across the country by region;

3. Section 3.2.2(g) is grossly unjust to landlords. Allowing tenants to withhold consent for testing is a convenient out-clause for any tenant who contaminates the property in the first place. If a tenant is smoking or manufacturing meth then naturally they will not give permission;

4. We support the creation and administration of standardised courses as well as test kits that will qualify and equip landlords to carry out testing at rental properties in the presence of tenants. Regular testing and detection serve a valuable community outcome and we encourage the Standards committee to take a common sense approach that is also commercially realistic.  By allowing (suitably trained) landlords to test with approved kits in the presence of tenants will remove the cost barrier for many New Zealand landlords.

**SPECIFIC COMMENTS**

**Clause Number:** 1.4

**Page Number:** 11

**Recommended changes and reason:** Distinction should be drawn between contaminations that pose a health risk to property occupants and contaminations that do no.  Suggest definition of 'contaminated' to be qualified as 'not always resulting in a risk of health for the property occupant'.

**Clause Number:** 2.2.2

**Page Number:** 16

**Recommended changes and reason:** Table 2

Maximum methamphetamine residues after decontamination: Living spaces; 2microgram/100 cm2

**Clause Number:** 3.2.2

**Page Number:** 21

**Recommended changes and reason:** Remove (g)

**Clause Number:** 1.2

**Page Number:** 36

**Recommended changes and reason:** The requirement for samplers to be independent of decontamination companies is crucial. It would be easy for a person or company to set up one company for sampling and another company for decontamination to get around real or perceived conflicts of interest. The NZPIF recommends that the standard makes it implicit that there needs to be a series of layers between samplers and decontaminators. For instance a person or their immediate family cannot be a director or majority shareholder of a sampling company if they are also the director or majority shareholder of a decontamination company. As an example, a decontaminator cannot be used in a property if they or any of their family members are a director or majority shareholder of the company that conducted the sampling on that property. The IRD has well established Associated Person Rules that could be referred to in this standard.

Suggested change:

In addition to "To prevent any real or potential conflicts of interest, a SQEP who is retained to conduct any assessment at a given subject property shall be independent of decontamination companies." will be the addition of " The test for the level of independence shall be governed by the IRD's Associated Persons rules."

**Clause Number:** 1.2.3

**Page Number:** 44

**Recommended changes and reason:** False negatives are the real concern, so suggest that the sentence "No more than 10% failures are permitted" be changed to "No more than 10% false negative failures are permitted".

Take out the sentence "Failures are defined as false positives or false negatives."