

Recommended changes to draft standard

To: Standards New Zealand Private Bag 2439 WELLINGTON Email: SNZPublicComments@mbie.govt.nz	From: (Your Name and Address) Building Officials Institute of NZ PO Box Manners Street Wellington 6011	
	Closing date for comment 20 February 2017	Date of your comments 22 February 2017 – late submission as accepted by Bruce Taylor
DZ 8510:2017 Committee: P8510		
Title: Testing and decontamination of methamphetamine-contaminated properties		

Comment is preferred in electronic format using Microsoft Word 2003 or above, following the layout below. Electronic drafts are available from the Standards New Zealand website at www.standards.govt.nz.

The following form is for comments to be submitted electronically. Please email your comments to SNZPublicComments@mbie.govt.nz.

General comment

Type your general comments in the box. The comment box will automatically expand to accommodate comments of any length.

BOINZ primarily represents the Accredited Building Surveyor (ABS) profession (in addition to its Building Control Officer membership) in this submission. Accredited Building Surveyors conduct pre-purchase inspections in accordance with NZS4306 and hence have a clear vested interest in DZ8510.

The ABS membership has raised concerns in general with the Institute regarding undue influence of service providers in the creation of DZ8510 and questions whether conflict of interests have been appropriately alleviated. The Institute agrees with its membership on the basis of the businesses/service providers that have been listed on page 3 instead of the nominating organisations that they ought to be representing.

ABS members have also raised concern with the Institute about the lack of engagement with working groups/sub-committees by their lead developers adding further doubt to the declaration and minimising of conflicts of interest and hence the validity and neutrality of the steering group.

The current draft standard is difficult to read/follow largely due to the different options that have been presented

within it. The Institute suggests a further draft for comment be published once feedback from the current consultation round has been considered and the draft amended accordingly by removing unnecessary clauses and sections.

Many of the standard clauses contain informative references and comments resulting in the standard wording in general to be misaligned with the technical terminology/writing standard typically applied to standards. The standard may benefit from engagement of a technical writer to make it consistent with other standards.

The standard defines accreditation and competence at reasonably detailed levels for testers, samplers, SQEP1 and SQEP2 but lacks the same level of detail for decontamination contractors and testing laboratories. In particular for decontamination contractors, granted their work is ultimately checked by SQEP2 post-decontamination, their level of competence should reflect the requirements posed on SQEP1 and SQEP2.

The inclusion of 'sampler' and 'tester' is valid in providing a clear definition of the difference between the two, however any accreditation/qualifications or similar relate to SQEP1 and SQEP2. Hence the standard should refer only to SQEP1 and SQEP2 in its body and not to sampler or tester as their credentials have not been clearly defined.

Given the lack of established training/accreditation this must be addressed but is beyond the scope of this standard; BOINZ / ABS would be happy to assist.

Specific comment

Insert the number of the clause, paragraph or figure. Do not preface the number with words (i.e. 1 not clause 1). If there is no clause number, use the section heading (e.g. Preface). Insert the page, paragraph and line number as appropriate. Use a new row for each comment.

The rows will automatically expand to accommodate comments of any length. Remove unused rows, or insert additional rows as required. To insert extra rows at the end of the table, go to the last cell and press the TAB key.

Clause/ Para/ Figure/ Table No	Page No	Recommended Changes and Reason <i>Exact wording of recommended changes should be given</i>
Committee representation	3	The committee representation as per wording of the standard itself should consist of representatives of nominating <u>organisations</u> ; hence instead of individual businesses being listed (almost ½ of the list) the individuals organisation they represent shall be published. If individual businesses have been invited to participate in the review process of this standard then StandardsNZ own criteria for forming a technical committee has not been complied with in this instance, and one would seriously question conflict of interests.
1.1	9	'...result of the use or manufacture of...' should incorporate all aspects including reference to distribution/sale/storage/processing rather than just use or manufacture of; '...result of the manufacture, storage, processing, distribution, sale or use of...'
1.4	9	Accreditation definition should reflect the reliance of international reference in the creation of DZ8510 by inclusion of ISO (and/or other?) competence assessment; '...following assessment by a Government or ISO recognised accreditation body,...'
1.4	10	Definition of Decontamination Contractor; should a contractor need to be accredited or approved by some means to avoid "home handyman" type service providers undertaking decontamination work?
1.4	11	Sampler definition; define further '...suitably qualified and experienced practitioner level 1 or 2...' – ie. '...practitioner level 1 or 2 as further defined in SQEP1 and SQEP2 below...'
1.4	11	Move SQEP1 and SQEP2 definitions to immediately below Sampler definition as the SQEP definitions help further define the definition of Sampler.
1.4	11	Tester definition should be expanded to include approved methods reference; 'A person who uses approved or commonly accepted in-field screening technology...'

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2.2.1	14	Remove Option A
2.2.2	15	Accept Option B – single level of clean-up. Standard’s purpose is to provide clear prescriptive guidance as a means of establishing compliance – Option A does not adequately define parameters and hence is open to too great a level of interpretation/too subjective.
3.1.1	20	This paragraph contains informative references that should be removed from the clause and provided as informative reference instead; remove from clause the following sentences and provide as commentary instead: ‘For example, is it necessary to decontaminate the property, or is...’ and ‘For example, use of screening technology cannot be definitive about...’ and ‘Therefore providing advice on whether the site should...’
3.1.2	20	Sections (a) to (d) should be worded more concisely and be aligned with the terminology applied in the following sections providing more detail (ie. in 3.2, etc); eg. ‘(a) Phase One – Screening Assessment: Determining the presence or absence of...’ Similar for (b) to (d).
3.1.2	20	The ‘NOTE’ should be made Commentary or Informative.
3.2.1	21	Remove ‘NOTE – This is a non-exhaustive...’ or integrate into the sentence listing examples; ie. 3.2.1 page 19 could read ‘While not an exhaustive list, examples of when a screening...’
3.2.3.1	21	Remove or incorporate NOTE into clause or as commentary
3.2.3.3	21	The clause contradicts itself given the term ‘shall’ and ‘if possible’ in the same clause; apply should instead of shall to read ‘..at least one sample should be taken from the roof space if possible.’
3.2.3.3	21	Is the 10m2 area reasonable for the screening process? Given the increasing occurrence of open plan living environments maybe this should be increased (20m2?) and a maximum number of samples for a defined living space be introduced - ie. one sample per 20m2 to a maximum of 3(?) samples per one defined living space.

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3.2.3.3	21 +22	Remove or incorporate NOTE into clause or as commentary
3.3.3.1	23	The 10m2 area limit may be more applicable here than in clause 3.2.3.3 given this is now a more detailed assessment.
3.3.6 (a)	25	refers to clause 3.3.8 but should refer to clause 3.3.7 instead.
4.3.3	27	Remove or incorporate NOTE into clause or as commentary
4.3.4.2 (b)	28	This clause should be expanded to define/quantify 'all insulation'
4.3.4.2	28	Remove NOTE as this has been covered sufficiently in previous clauses/comments.
4.3.4.3	28 +29	In (a) change 'hatch' to 'access point' And in (b) change 'hatches' to 'access points'
4.3.4.3	29	Remove or incorporate NOTE into clause or as commentary
4.3.4.5	29	Remove or incorporate NOTES into clause or as commentary

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4.3.4.6	29	Remove or incorporate NOTE into clause or as commentary
4.3.4.7	29	Remove or incorporate NOTE into clause or as commentary
4.3.9	30	Incorporate NOTE into clause as this is a prescriptive requirement.
5.3	32	Remove NOTE as this is speculative and therefore has no relevance to the clause.
5.3	32	This clause should sit under section 3 not section 5.
5.4	32	Clarify intent: is it a suitably qualified and experienced person and/or Level 2 or is it only Level2? If latter than amend wording to ‘... shall be developed by a SQEP2, in consultation with...’ otherwise amend wording to ‘... shall be developed by a SQEP1 or SQEP2, in consultation with...’
5.4	32	Remove or incorporate NOTE into clause or as commentary
5.5.1	33	This is too subjective and should be amended to reference contamination levels being below limits set in this standard; ‘...independent evidence of effective decontamination to within acceptable levels published in this standard has been received...’
5.5.2	33	The last paragraph ‘If sampling and testing following...’ is redundant as this is covered in previous clauses.

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6.2(d)	34	If 5.4 page 32 is clarified then 6.2(d) could be a SQEP1 or SQEP2
6.4	34	Section heading refers to 'Competency of samplers and testers' yet only competencies of samplers are provided. Needs additional sub-clause for testers. [note - ideally these should be changed to SQEP1 and SQEP2 terminology instead of tester and sampler in-line with 6.2 etc]
6.4.1	34	Sub-clause (c) is incorrectly labelled (a). Sub-clause (c) should also be amended to remove testing kits and replace with test method; '...independent organisation for approved test methods (refer Appendix C).'
6.4.1	34	Remove NOTE as this is speculative and therefore has no relevance to the clause.
6.5(a) to (c)	35	Remove '(qualification to be developed)' / '(to be developed)'
6.5(d)	35	Remove clause as this would be expected to form part of any substantive training course. Or alternatively amend to '(a) to (c) above shall include ethical behaviour training'
6	34 + 35	In general this section repeats a lot of the information already covered in other sections of the standard.
A2.1(i)	36	For consistent terminology and clarity change '..top-to-bottom direction' to '...vertical direction' as this then aligns with A2.1(g)(ii)
C1.1.2	44	As noted previously, given the reliance on, and adoption of international guidelines and best-practice in DZ8510 this clause should be expanded to allow for other internationally recognised in-field screening technologies. The wording of this clause should be changed to '... independently validated by an organisation accredited to NZS ISO/IEC 17025 or internationally recognised verification such as Veritas or ISO9001 certificates, to be able to detect...'

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C1.1.2	44	This clause should be re-worded to clarify the intent of ‘...able to detect levels at the acceptable decontamination level and half of the decontamination level set in this standard...’ – why does a test need to be able to identify half levels? Screening tests are intended to provide a positive or negative return.
C1.2.7	45	This might need further clarification as to who ‘shall maintain a list and make this available’.