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Risk assessment methodology

This is a very important opportunity to review and make sure that the new assessment system includes corrections of some fundamental problems of the significant and dangerous weaknesses of the current risk assessment system

This draft is founded on the philosophy of cost-benefit analysis. But applying a cost-benefit analysis approach only to issues which concern the environment and human health is unfair, unethical & risky. There is current research which points out the gaps in the science about the potential harm to public health & our environment of aerial poison operations.

Hence the EPA must broaden their risk assessments of hazardous substances like Brodifacoum & 1080 poisons to include things that might highlight the wider issues.

These issues can be explored by the following:

- epidemiological studies into health issues/spikes in health issues in areas where aerial poison has occurred.
- \* actively interview local residents who are down wind from the operations to ask about health impacts, impacts on bush, bird life, insect life, pasture, estuary, coastal life, etc.
- \* to conduct extensive risk assessments of the impacts of 1080 dust and mist
- \* to conduct regular & extensive risk assessments of the impacts of 1080 on deep groundwater at p/p/trillion
- \* to review and evaluate their operational procedures to ensure that there are no conflicts of interest

Risk assessments must not be motivated by the 'chase to economic benefits', at the serious cost to human and ecosystem health.

There is an underlying assumption that these use of these substances 'will go ahead', regardless of the potential gaps & potential harm to health and that assumption needs to be broken down.

The public health aspects of operational risk assessments should not be carried out operators (contractors) who have been tasked to do the poisoning, because of an obvious conflict of interests, they will naturally not want to find anything which might stall the project. Instead, the public health aspects of a risk assessment must be done by someone completely independent with no interest in whether the operations go ahead or not.

\* also see info <https://oehha.ca.gov/proposition-65/chemicals/sodium-fluoroacetate>

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