

PMCSA Meth Report Debacle - Key Points Summary

1. If PMCSA Report numbers are correct from a health risk perspective, this is a good thing.
2. [The PMCSA report has manifest shortcomings, in science, fact, risk assessment and risk management recommendations](#) and as such cannot be relied upon:
 - a. [People are getting sick in houses where low levels of meth are present](#) – these facts are being ignored, because they are not documented/presented in the specific way the Office of the PMCSA required in order to be considered
 - b. [Many jurisdictions have guidelines and regulations that apply to meth manufacture AND use](#) – the PMCSA has erroneously advised the public of NZ that NZ is unique
 - c. [Research bias](#) – significant real-world science was first considered the day before the first Executive Summary was produced, while Fairgo articles were being hunted down months earlier at the start of the research process
 - d. Leaps of logic – no other jurisdiction in the world is proposing an acceptable level of meth residues at 15µg/100cm²
 - e. [High risk approach to Environmental toxicology](#) – the Scientist who reported to the Ministry of Health, work that underpins the standard, does not know how the PMCSA arrived at its figures and believes that if a recommendation is made to adopt a change of this magnitude specific research should be done – the PMCSA Report makes no specific research recommendations
 - f. [Assessment of the risk by the PMCSA skews the figures to diminish the extent of the problem](#) – less than 1% of swabs in ESR were > 30µg, but these came from 4.5% of houses and less than 3% of swabs were >15µg coming from 14% of houses. A five-fold understating of risk.
[Full ESR Report](#)
 - g. If the recommendations for risk management made in the PMCSA are followed by Landlords, their risks will increase – they will not be able to determine responsibility and they will only know they are in breach of a requirement enshrined in law, when they get a positive result – they will be paying back rent and compensating tenants
 - h. The PMCSA Report relies for its efficacy on the expert opinion of Dr. Nick Kim. Dr. [Kim's views were examined by 3 separate scientists as part of the Standards process](#). They were found to be wanting from a scientific perspective
3. The Standards process that produced NZS8510 was denigrated by Phil Twyford who demanded it be investigated. This independent investigation has been completed and [NZS8510 has received independent sign off](#)
4. The PMCSA Report and the processes that led to its development have not been subject to independent review in the same way the process which developed the Standard has, yet, the Standard has been discounted, while the PMCSA Report has been embraced.
 - a. The errors in science, fact, risk assessment and recommendations around risk management are being adopted into policy –

[HNZ change on day of PMCSA Report release](#)
[REA in early June](#)
Tenancy Tribunal indicating changes in policy based on PMCSA Report
 - b. [Key actors in the 2 to 3 year strategy to increase acceptable meth residue levels in property, were provided with early release reports from the Minister for Housing, with follow up communications suggested](#). There is no record of any follow up communications – inconceivable given the significance of the report

AS A MINIMUM, THE DEVELOPMENT, CONTENTS AND ROLL OUT OF THE PMCSA METH REPORT AND ASSOCIATED POLICY MUST BE INDEPENDENTLY INVESTIGATED, IF THE INTERESTS OF THE MOST VULNERABLE MEMBERS OF NEW ZEALAND SOCIETY ARE TO BE PROTECTED.