From: toby heale
To: Mailroom Mailbox
Subject: Why the Canterbury air plan must be rejected.
Date: Wednesday, 1 April 2015 11:48:59 a.m.
Attachments: The Proposed Canterbury Air Regional Plan must be rejected.docx

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Please open the attachment.
The Proposed Canterbury Air Regional Plan must be rejected.

The plan thinly disguises a gathering of powers for the purpose of perpetuation. Environment Canterbury should be a self-extinguishing body, not a self-perpetuating one.

The proposed plan seeks to oversee practically every aspect of private and commercial life. The desired remit is so wide-cut and the boundary so ill-defined that it is impossible to define the scope of policing.

Because this document heralds an era of control over more or less every human activity it will be oppressively expensive to operate. It will occupy qualified staff better used in the productive economy and it will add substantially to the costs of the community it seeks to police though increases in rates or taxes.

Because the plan seeks powers to regulate far more activities than today it will also add an oppressively expensive layer of compliance costs to business. A fear of transgression in the population, who will not understand or be able to operate such measures as Ringlemann Smoke Chart, may cause reactions with possible financial and health impacts. The first time a citizen may come across the chart might be when he or she learns they are in breach of inflexible parameters.

A third imposition on the private individual will be the imposition of fines. It will be though fines that the organisation will claim to demonstrate it is aware of its impact on the public purse and is trying to reduce it.

That obfuscation is long-time expired.

From these observations alone the Proposed Canterbury Air Plan is itself carcinogenic.

The plan is also undesirable because it represents a gathering of powers is against possible, not probable or actual threats. This is a failure to understand the management of risk. Risk is not managed by avoiding it. It is managed by controlling it, watching for it and correcting it. Only by cultivating a commercial and private society which is responsible and informed will risks be contained and controlled promptly. Avoiding risk simply deskills people.

The plan lists many pages of threats. Without going into each I take a few examples at random:

**Benzyl Chloride**: Sales are monitored because it can be used in the manufacture of amphetamine class drugs. It is highly unlikely that Environment Canterbury can add anything to the control of this substance.

**Caprolactam**: Is used in the manufacture of Nylon-6 and if there is a manufacturer of that substance in Canterbury they will already understand its properties. It is a mild irritant. It is Category 4 (probably not carcinogenic to humans). It would be for Environment Canterbury to indicate the source of Caprolactam that represented a clear and present danger to the population of Canterbury from exposure to that source (and possible health consequences if any) before mandate was awarded.

**Allyl chloride**: This substance is highly toxic and (in)flammable. It is/can be used in the manufacture of pharmaceuticals, and plastics. Any manufacturer of these products using this chemical would
already be aware of its properties. If there are no manufacturers of these products it is for Environment Canterbury to show where else this chemical may occur and to demonstrate a clear and present danger.

**Carbaryl.** This is commercially available slug and insect killer.

The list goes on for pages and seems to list everything that is or might be hostile to humans, but possibly it is designed to frighten those who do not check.

The plan does seem to be designed to frighten the reader into believing he or she is under imminent threat of poisoning from a variety of sources, or he or she is in an environment that is degrading rapidly: that current activities are hostile to the environment and by awarding these powers some unspecified threats will be removed.

It must be seen for what it is: an attempt to gather powers for aggrandisement and self-perpetuation. It is also an urgent attempt because the very foundation for Environment Canterbury is the Resource Management Act (RMA) which is up for review, updating and reform in Parliament.

This Plan is trying to front-run Parliament’s deliberations. It must be struck down for that reason alone. Whether or not the RMA should be reformed is not the question. New Zealand is a parliamentary democracy and what parliament says goes.

The Canterbury Air Plan must be refused anyway until Parliament has finished its deliberations on the RMA. Front running in the stock market is an offence. Front running in the bureaucracy should be seen for what it is.

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