

**From:** [Kevin Tiffen](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission to Proposed Canterbury Regional Air Plan - Waimate District Council  
**Date:** Friday, 1 May 2015 4:38:26 p.m.  
**Attachments:** [air\\_regional\\_plan.pdf](#)

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Please find attached our submission to the Air Plan.

Any questions can be directed to me.

Thanks

Regards

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1 May 2015

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Proposed Canterbury Air Regional Plan  
Environment Canterbury  
PO Box 345  
**CHRISTCHURCH 8140**

**SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN**

PART A

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**Trade Competition**

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) Adversely affects the environment; and
- b) Does not relate to trade competition or the effects of trade competition.

**I could not gain an advantage in trade competition through this submission.**

PART B

I do wish to be heard in support of my submission, and if so, I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing.

PART C

- (1) The specific provisions of the proposal that this submission relates to are the whole of the Plan in its entirety.
- (2) Our submission is that:

**A. Submission: General**

The Waimate District Council appreciates the overall effort being made by Environment Canterbury to clean the air as a statutory responsibility to manage air quality and national health-based targets.

While we support the eventual replacement of older style wood burners with new technology burners, we consider the timetable to achieve this may be unrealistic and would prefer that education and advocacy promoting better burning practices together with the Good Wood Merchant programme should be foremost. Council will offer support and work constructively with Environment Canterbury's initiatives in this regard.

Using Environment Canterbury's figures, about 550 households in urban Waimate would be affected by the banning of older style burners, open fires and multi fuel burners. This could equate to a conservative \$2-3 million being spent by the Waimate homeowner over the 5 year compliance timeframe. In Waimate, 41.4% of persons aged 15 years or older have an annual income of \$20,000 or less where the requirement for new technology burners or other forms of alternative heating could be a serious financial burden. It is recognized that Environment Canterbury intend to provide financial support and initiatives but that will still have to be paid for by the community. There is the risk that by prohibiting the use of older style wood burners that some people may chose not to have any form of heating whatsoever by simply wrapping up

with additional clothing which could be shifting one health problem to another, especially for the elderly and those on fixed incomes that cannot afford replacement or alternative heating. Council is of the opinion that education and advocacy alone on promoting proper burning practices together with the Good Wood Merchant programme should be tried first which may achieve compliance without requiring replacement of the older style burners within the 5 year compliance timeframe. In fact, in Environment Canterbury's own 2014 Discussion Document, it did state that *"we think that better burning practices and the voluntary upgrade of woodburning appliances will be enough to achieve the NESAQ in Waimate/Waimatamate"*. Council has some reservations over the methodology in using the PM10 measure as it would appear from Environment Canterbury's Air Quality Status Report (June 2014) that the PM2.5 measure is more critical to people's health. Another query relates to the need to take the average readings over a 24 hour period for each exceedance when some form of averaging over a number of days, weeks or even months may be a better reflection of the air pollution overall. Also, there is particular concern that one only monitoring site is located in the most likely highly polluted area of Waimate which could penalize those outer areas within the Waimate Clean Air Zone where the air emissions may be complying but everyone within the Clean Air Zone will have to upgrade their burners. A more central location for the monitoring site is preferable. In addition, Council is cautious over the extent of monitoring or enforcement of the rules that will need to be carried out including whether detection of the older style burners and/or open fireplaces can actually be achieved.

**B. Submission: Policy 6.17 (page 6-2)**

**Reason for submission:** "Township" is not defined in the definitions however "urban" is defined as meaning "any site or area zoned for residential, commercial or industrial activities" which is an acceptable alternative to the term township.

**Decision requested:** Replace "township" with the term *"urban areas"*.

**C. Submission: Policy 6.43 (page 6-4)**

**Reason for submission:** For the Waimate district, it is considered that education and advocacy of better burning practices together with the Good Wood Merchant Programme should be tried first which may achieve compliance without the compulsory replacement of older style burners. This action was acknowledged in Environment Canterbury's own 2014 Discussion Document. The upgrading of wood burning appliances would therefore be voluntary for (say) up to 3 years (2018). If compliance has not been achieved by the year 2018, then the compulsory replacement of older style burners shall be enforced to be achieved by (say) the year 2022.

**Decision requested:** That the policy shall read: *"On any site less than 2ha in area, the discharge of contaminants into air from any open fire is to be avoided. In Waimate, promote better burning practices together with the good wood merchant programme and allow the voluntary replacement of older style enclosed burners up to the year 2018. If compliance has not been achieved in Waimate by 2018, then any older style enclosed burner that is 15 years old or older shall be replaced by the year 2022."*

**D. Submission: Rule 7.92 (page 7-27)**

**Reason for submission:** For the Waimate district, it is considered that education and advocacy of better burning practices together with the Good Wood Merchant Programme should be tried first which may achieve compliance without the compulsory replacement of older style burners. This action was acknowledged in Environment Canterbury's own 2014 Discussion Document. The upgrading of wood burning appliances would therefore be voluntary for (say) up to 3 years (2018). If compliance has not been achieved by the year 2018, then the compulsory replacement of older style burners shall be enforced to be achieved by (say) the year 2022.

**Decision requested:** That the rule shall read: *"Within the Waimate Clean Air Zone the discharge of contaminants into air from an older-style enclosed burner is a permitted activity provided the following conditions are met:*

- (1) *The older-style enclosed burner is located on a site that is 2ha or greater in area; or*
- (2) *In Waimate, wood burner users will manage their smoke emissions by regularly maintaining their wood burner, always using dry and appropriately seasoned wood and operate their fire so that there is no visible smoke most of the time until 1 January 2018. If after that*

*date, compliance with no more than one exceedance of 50 micrograms of PM10 per cubic metre averaged over a 24 hour period per year is not met, then the discharge does not occur after:*

*(a) 15 years after the date of installation of that burner; or*

*(b) 1 January 2022;*

*whichever is later.*

*Note: For Waimate, Environment Canterbury will undertake education and advocacy initiatives aimed at providing in-home training on better burning and running a smoke free fire together with monitoring and addressing smoky chimneys (on site) and promoting the Good Wood Merchant Programme ”*

#### **E. Submission: General**

For Environment Canterbury to note that the current Regional Air Plan includes fuel having a sulphur content of 1 % or greater in the list of prohibited fuels [See Discussion Document for Consultation, 9 appendices 1.(a)], and that most New Zealand coals, with the exception of Westland, have a sulphur content of between 1% and 6%. Westland coal has a sulphur content of between 0.3% and 1.2%.

**Reason for Submission:** Coal smoke from domestic burners can contain any number of about fifty gases which are particularly hazardous to human health, particularly when combined with damp, cold air which keeps those gases close to ground level in still weather conditions. These conditions give rise to the winter phenomenon known as smog.

These gases include hydrogen sulphide (H<sub>2</sub>S) carbon dioxide (CO<sub>2</sub>) and carbon monoxide (CO). Hydrogen sulphide, which has the characteristic rotten egg smell, and carbon monoxide, the lethal gas from car exhausts are both particularly dangerous to human health. Some of the gases from coal smoke are neurotoxins or developmental toxins which adversely affect foetal and infant development. Twenty-four are known, probable, or possible carcinogens [Scott Sklar Scott, founder and president of The Stella Group, Ltd., in Washington, DC, is the Chair of the Steering Committee of the Sustainable Energy Coalition].

**Decision requested:** That Environment Canterbury regulates to exclude coal with a sulphur content greater than 1 % from the domestic heating market in accordance with the existing prohibition.