

**From:** [ECInfo](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** FW: Submission EMAIL:01000007  
**Date:** Wednesday, 29 April 2015 10:09:33 a.m.  
**Attachments:** [{cid:A1F58AB296B1DB4FBF927229FDECF531@ecan.govt.nz}12484 Gibson, Alastair - LTP 2015 - WWW.pdf](#)  
**Importance:** Low

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Kia ora Team

This email came in through our Customer Services email. Can you please workflow.

Ngā mihi

Melanie

Customer Services

----- Original Message -----

**From:** Rainey Sean  
**Received:** 28/04/2015 3:32 p.m.  
**To:** ECInfo; Environment Canterbury; Services Customer; Services Customer  
**Cc:** [ajgibson@ihug.co.nz](mailto:ajgibson@ihug.co.nz)  
**Subject:** Submission

Dear Sir/Madam,

Please find attached a submission on the Regional Air Plan. It arrived as part of the Council's LTP submissions. Could you please process it and acknowledge Alastair's submission.

Many thanks.

Sean Rainey  
Democracy Services.  
Christchurch City Council

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Christchurch City Council  
<http://www.ccc.govt.nz>

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# CHRISTCHURCH CITY COUNCIL

## Draft Long Term Plan 2015-25

**- Received via Have Your Say -**

Submissions close 12 noon on 28 April 2015

<b>Full Name*:</b>	Alastair James Gibson
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<b>Postal Address (City and Postcode)*:</b>	Christchurch 8014
<b>Email Address:</b>	ajgibson@ihug.co.nz
<b>I am Completing this Submission:</b>	For myself
<b>If you are Representing a Group or Organisation, How many People do you represent?:</b>	
<b>Organisation Name:</b>	
<b>Your role in the Organisation:</b>	
<b>Date Sent:</b>	23/04/2015 3:37:00 PM
<b>Are you submitting a Supporting Petition Form?</b>	
<b>Do you wish to present your submission at a hearing?:</b>	No
<b>Daytime Phone Number:</b>	
<b>Email 2:</b>	

### Submission:

	<p><b>Environmental Canterbury's Proposed Canterbury Regional Air Plan</b></p> <p>Environment Canterbury's Proposed Canterbury Regional Air Plan</p> <p>Thursday, 23 April 2015 9:52 am</p> <p>I have serious concerns that unrealistic clean air requirements are being based on the claim that substantial evidence exists for a link between air pollution levels, specifically PM10 levels linked to domestic wood burners, and deleterious health effects. Claims have been made that hundreds of deaths occur each year in Christchurch as a result of air pollution. This claim is based on a very questionable model used by public health specialists in their environmental risk assessment.</p> <p>The model used is called the linear response no threshold (LNT) model which states that health risk is directly proportional to the exposure dose and that there is no threshold below which harm does not occur. It also assumes that the sum of several very small exposures has the same effect as one larger exposure. This leads to multiplying very low doses by large numbers of individuals to estimate the number of deaths attributable to the pollution.</p> <p>Environmental risk assessment typically involves extrapolation from the high doses of exposure used in animal experiments to the very low doses that are characteristic of human exposure. This extrapolation over several orders of magnitude carries enormous uncertainty. It is generally accepted in the field of</p>
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toxicology that a threshold does exist for the vast majority of potential toxins, below which no harm is caused. Cells have mechanisms to detoxify harmful chemicals and low doses may in some cases even trigger beneficial responses.

For example, ingestion of say 200g of table salt by 1000 people could result in 500 deaths. The LNT model would say that 1000 people ingesting 2g of salt (less than 1/2 teaspoon) would still result in 5 deaths. In other words, there is a threshold above which ingestion of a certain amount of the salt would be expected to cause harm. A quote often used in toxicology; 'the dose makes the poison' (Paracelsus).

Conservative assumptions that the LNT model is valid has led to stringent air pollution standards that are not only unrealistic but potentially harmful because the deleterious effects of inadequately heated homes is well established.

In summary, the 'one size fits all' approach of government legislation with their tight air pollution targets is inappropriate. People in Christchurch with inadequate home heating are at risk of major adverse health effects that may not be relevant in warmer North Island centres. Against that is the claimed excess mortality due to low levels of air pollution which is based on a model which is biologically implausible and increasingly challenged in the area of environmental risk assessment.

Signed:

Dr. A.J. Gibson