

From: [Sarah Drummond](#)
To: [Mailroom Mailbox](#)
Subject: FW: Submission on Canterbury Regional Air Plan
Date: Friday, 1 May 2015 10:21:45 a.m.
Attachments: [150501_Canterbury Regional Air Plan submission.pdf](#)

For trimming please

From: Hogarth, Nicky [mailto:nicky.hogarth@holcim.com]
Sent: Friday, 1 May 2015 10:19 a.m.
To: Sarah Drummond; Mailroom Mailbox
Subject: Submission on Canterbury Regional Air Plan

Hi There

Please find attached a submission on the Canterbury Regional Air Plan from Holcim (New Zealand) Ltd.

Kind Regards

Nicky

[Nicky Hogarth](#)
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Submission on the Proposed Canterbury Air Regional Plan

To: The Chief Executive
Environment Canterbury
sarah.drummond@ecan.govt.nz

Name of submitter: Holcim (New Zealand) Limited

1. Introduction:

- 1.1 This is a submission on the Proposed Canterbury Air Regional Plan notified on 28 February 2015.
- 1.2 The submitter could not gain an advantage in trade competition through this submission.
- 1.3 Holcim (New Zealand) Limited (“Holcim”) began its involvement in the New Zealand building industry in 1888, when the Milburn Lime and Cement Company was incorporated in Otago. Today, Holcim directly employ over 400 people across a number of operating sites in New Zealand manufacturing cement, lime, and aggregates.
- 1.4 Holcim operates the Cement Depots and distribution facilities at: Lyttelton - Gladstone Quay Port of Lyttelton; Sockburn - 2 McAlpine Street Sockburn; and Timaru Terminal - Port Loop Road Timaru.

2. Submission and Relief:

- 2.1 The submitter opposes in part the Air Regional Plan as there is no specific rule for cement storage and handling. The default Rule 7.59 results in this activity being a discretionary activity.
- 2.2 The submitter does not consider that the activity of cement storage would appropriately fit within Rule 7.37. Therefore the activity would be considered discretionary pursuant to Rule 7.59.
- 2.3 The submitter considers that this approach is inappropriate, inefficient and ineffective at addressing cement storage and handling.
- 2.4 The submitter considers that it is necessary and appropriate to include a new rule relating to cement storage and handling, providing for this activity as a permitted activity subject to performance standards. The suggested new rule is:

7. XX The discharge of contaminants into the air from cement storage, handling, redistribution or packaging is a permitted activity provided the following conditions are met:

1. cement is stored in fully enclosed silos that must be fitted with a filtration system with a filter surface area of at least 24 m²:
2. there shall be no visible discharges of dust;
3. cement shall be delivered via a fully enclosed system;
4. silos must either have an automated remote filling system or be fitted with a high level alarm that has both an audible and visual indicator and when the alarm is triggered it will stop the filling of the silo.

- 2.5 The submitter considers that any infringements of the above conditions should be addressed through a restricted discretionary activity. The suggested new matters of discretion and assessment criteria are:

XX. The storage, handling, redistribution, or packaging of cement

Discretion is restricted to:

- Filter and delivery system

Assessment criteria

- The storage and distribution system and/or filter is appropriate to avoid fugitive dust emissions

- 2.6 The installation of bag house filter systems, along with the delivery of cement by fully enclosed systems will ensure that there are no fugitive dust emissions from cement storage and handling facilities. These systems are utilised throughout New Zealand and are best industry practice.

- 2.7 Specific 'conditions' can be identified and utilised to allow this activity as a permitted activity throughout the region. As cement is an essential material for building and construction, this approach is considered to be effective and efficient as the measures to avoid, remedy or mitigate adverse effects can be identified and quantified in a measurable sense.
- 2.8 This is consistent with the approach in the Proposed Auckland Unitary Plan in respect to regional air rules. It resulted from expert caucusing and mediations required by the Independent Hearings Panel, and is reflected in evidence by the parties. The approach is also consistent with the manner in which cement storage and handling is addressed in other regions.

Relief sought:

- 3.1 The submitter seeks the following decision from Environment Canterbury:
- a. that the proposed provisions be amended to address the concerns set out in this submission so as to provide for the sustainable management of the region's natural and physical resources and thereby achieve the purpose of the RMA.
 - b. any other additional or consequential relief to the Proposed Air Regional Plan, including but not limited to, the maps, issues, objectives, policies, rules, discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission.
- 3.2 Suggested relief to deal with the concerns in this submission is set out above. However, there may be other methods or relief that are able to address the submitter's concerns, and the suggested revisions do not limit the generality of the reasons for this submission.
- 3.3 The submitter wishes to be heard in support of its submission.
- 3.4 If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.

Signature:



Nicky Hogarth

Environmental Manager

Holcim (New Zealand) Ltd

Date: 30 April 2015

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