

**From:** [Andrew Wilson](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Submission on the Proposed Canterbury Air Regional Plan  
**Date:** Friday, 1 May 2015 2:00:57 p.m.  
**Attachments:** [air-plan-submission-form final.pdf](#)

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Please find attached my submission.

If you could acknowledge receipt of this.

Kind regards

**Andrew Wilson**  
*General Manager*

**Eenergy Limited**

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# Submission on the Proposed Canterbury Air Regional Plan

Submitter ID:

File No:

## Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

Return your signed submission by 5.00pm, Friday 1 May 2015 to:

Freepost 1201  
Proposed Canterbury Air Regional Plan.  
Environment Canterbury  
P O Box 345  
Christchurch 8140

### A

Full Name: ANDREW WILSON

Phone (Hm): 03 960 9755

Organisation\*: EENERGY LIMITED

Phone (Wk): 03 341 1338

\* the organisation that this submission is made on behalf of

Postal Address: - PO BOX 11-016, SOCKBURN,  
CHRISTCHURCH

Phone (Cell): - 021854772

Postcode: - 8443

Email: - andrew@eenergy.co.nz

Fax: \_\_\_\_\_

Contact name and postal address for service of person making submission (if different from above):

### 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.

Please tick the sentence that applies to you:

- I could not gain an advantage in trade competition through this submission; or
- I could gain an advantage in trade competition through this submission. **If you have ticked this box please select one of the following:**

- I am directly affected by an effect of the subject matter of the submission
- I am not directly affected by an effect of the subject matter of the submission

Signature: Andrew Wilson

Date: 1st of May, 2015

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

### B

- I do not wish to be heard in support of my submission; or
- I do wish to be heard in support of my submission; and if so,
- I would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearing

<p><b>C</b> (1) The specific provisions of the proposal that my submission relates to are: <i>(Specify page number and subsection numbering for each separate provision).</i></p>	<p>(2) My submission is that: <i>(State concisely whether you support or oppose each separate provision being submitted on, or wish to have amendments made and the reasons for your views.)</i></p>	<p>(3) I seek the following decisions from Environment Canterbury: <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i></p>
<p>7.76 Item 3 (page 7-24)</p>	<p>That the wording of this item be changed to be consistent with Schedule 2: 3 (d)(ii) (1) allowing for appliances that do not have a re-fueling cycle that causes visible smoke but do have an automated clean cycle such as pellet fires. The current clause is related specifically for technology that has a loading cycle that results in visible smoke. 7.21 (4) includes a similar provision I am requesting in relation to pellet fuel boilers. The current wording does not address the different forms of technology by narrowing the reasons for periodic smoke to fuel loading only.</p>	<p>Please amend to read: 3. The visible discharge of contaminants into air from space heating appliances for a period exceeding 15 minutes following start up and 5 minutes during each succeeding hour of operation.</p>
<p>Schedule 8 – Test Method (page 8-32)</p>	<p>Where possible to allow the use of European reports where it can be demonstrated that the appliance meets the ultra-low emission and efficiency requirements.</p>	<p>Add the following wording: Appliances can use overseas testing where overseas tests are deemed functionally equivalent and, are from an accredited overseas laboratory, and can demonstrate that the appliance meets the ultra-low emission and efficiency requirements.</p>
<p>Schedule 8 – Test Operating Regime (page 8-32)</p>	<p>That stronger weight is placed on true real life testing results where there is an uncontrolled fuel source. There is limited research available but some evidence that a controlled fuel source results in more favourable worst case outcomes from improper use of the appliance.</p> <p>It is important to be transparent and clear about the impact of improper use and how an appliance is able to be run in the house including by under loading the appliance. Therefore where it is an uncontrolled fuel source if it is possible to run the fire with a half load even on the full setting then the real life testing would need to include part loading.</p>	<p>Please change wording to: The enclosed burner is to be tested over the normal operating regime of the enclosed burner and operated over a range of output settings: i.e. at maximum and minimum outputs and maximum and minimum fuel loadings if it is possible to run the appliance on one output setting but regulate the output by manually restricting fuel loading.</p>

Schedule 8 – Test Operating Regime (page 8-32)	That for different technologies where start-up can be demonstrated as having minimal or little effect on the overall emission and efficiency outcome that the burden of re-testing to include start-up be removed where this is the only reason that overseas test reports cannot be accepted. An appropriate scaling must be applied in the absence of start-up testing.	Add wording to: Where there is valid testing data without start-up and it can be demonstrated that the appliance would meet the emission and efficiency standards when start-up is included that the overseas reports be accepted with an appropriate scaling that takes into account the effects of start up.
Schedule 7 – Part 1 – Installation (page 8-30)	<p>Installation should not be limited New Zealand Home Heating Association members. As an example, pellet Fires include a lot of electrical components and are an automated feeding and combustion. They require significant training and each model has different software and electrical components. It is important that a suitably qualified and importer / manufacturer accredited installer installs pellet fires and maintains pellet fires to ensure they run at the tested results in real life. This would not preclude a Home Home Heating Association SFAIT from installing a pellet fire but must equally an appropriately trained gas fitter or pellet fire technician must be allowed to install and maintain a pellet fire.</p> <p>Either change the entire clause to suitably qualified person. This allows for the development of another training provider, a separate category of LBP etc.</p>	<p>Change the wording to: Domestic solid fuel burners (other than pellet fires) installed after 28 February 2015 are to be installed, or their installation approved, by a person or company accredited as a Solid Fuel Appliance Installation Technician by the New Zealand Home Heating Association or a suitably qualified person.</p> <p>Pellet fires are to be installed by a suitably qualified person who has been accredited by the importer or manufacturer for the installation of pellet fires.</p>
Schedule 7 - Part 2 – Registration and maintenance (page 8-30)	That the maintenance must be performed by an importer / manufacturer accredited Pellet Fire technician. Again we want these running efficiently and serviced correctly.	<p>Change wording to: Upon request by a CRC office, the person responsible for the space heating appliance must provide the following information to the CRC:</p> <ol style="list-style-type: none"> <li>1) A record of maintenance of the appliance (can be receipts, photographs or diary entries). For pellet fires this maintenance must be formed by an importer / manufacturer accredited technician.</li> </ol>

Various but could not find a specific place to insert	All small-scale low emission burners are impacted by poor fuel quality. With pellet fuel there is an opportunity to steer the industry in the right direction. It should be a requirement that only fuel that meets the NZ standard should be used in Domestic small-scale pellet burners. It should be a requirement that 3rd party auditing of fuel quality be conducted on a regular basis. Ideally we would want Din-Plus standard but we also do not want to remove competition due to the costs of attaining Din-Plus certification.	Add a clause regarding pellet fuel for domestic pellet burners region wide that pellet fuel to be used must meet the current NZ standards and the manufacturer must be able to provide evidence of regular 3rd party auditing.