Hi Mailroom,

Can you please TRIM and workflow this submission?

Thanks

Charles

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

From: Brand Steven Paul
Received: 1/05/2015 2:12 p.m.
To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Cc: Taylor Coal Properties Limited
Subject: Submission on the proposed Cantebury Air Regional Plan brand n badcock

Dear Sirs,

Please find attached a copy of our submission on the proposed Air Plan.

Please respond acknowledging receipt of these documents.

Regards.....Barbara Badcock
03 3125266 or email
SUBMISSION ON THE PROPOSED CANTERBURY AIR REGIONAL PLAN

A
SUBMITTED BY:
SP Brand & BA Badcock
Flower Growers
59 Maindonalds Road
West Eyreton
RDS Rangiora 7475

CONTACT:
Steve Brand

DATE:
30th April 2015

TRADE COMPETITION:
I could not gain an advantage in trade competition through this submission.

B
I do wish to be heard in support of my submission.

C

INDUSTRIAL, TRADE AND LARGE SCALE DISCHARGES TO AIR

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<tr>
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PROPERTY SITUATION AND DETAILS

Site: West Eyreton – North Canterbury
Distance from closest village: Oxford – 15km
Distance from closest Town: Rangiora – 20km
Distance from Closest City: Christchurch – 50km

Local demography: 10 acre blocks mixed with large scale farming and some horticulture
Property Size: 2 sites 16 hectare in total
Business longevity: 20 years

HORTICULTURAL BUSINESS

Annual Income: $600,000 (approx.)
Fulltime Staff: 5
Part-time Staff: 15
Wage Bill: $250,000

All Year Product: Lilies, Alstromeria,
Seasonal Product: Gypsophila, Paeonies, Delphiniums, Viburnum, Others

EXISTING COAL HEATING

Number of burners: 3
Kw per burner: 200
Heating Fuel: Coal
Usage per day: 1 Ton - $220.00
Heater efficiency: 80-85%

Heating type: Ducted hot air
Building heated: Twinskin plastic tunnelhouse-climate controlled

Coal used: Low Sulphur/Low Ash
Coal Merchant: Taylor Coal Ltd
Consent Required: NO
Currently compliant: YES – under current ECAN permitted activity and regulations
ALTERNATE HEATING COMPARISONS TO COAL

Coal $220 per day
Wood Pellets $600 per day
Diesel $800/900 per day
Natural Gas Not available in our area
Electricity $800/900 per day

ALTERNATE HEATING COSTS TO CONVERT FROM COAL

Wood Pellets $90,000-100,000 for 3 heating appliances
Diesel $90,000-100,000 for 3 heating appliances
Natural Gas Not available in our area
Electricity $120,000-150,000 for 3 heating appliances
+$80,000 Electricity line/transformer upgrade

HOW COST EFFECTIVE HEATING IMPACTS OUR BUSINESS

1. Heating is during the wintertime only. This heating provides us with the ability to produce flowers during the winter months. Without the heating we would have no income for approximately 6 months of the year. Without this production we would not be able to support our staff and our business model would collapse.
2. Without year round production we would only be able to employ staff in the summer. All of our employees have been with us for several years and we have put a lot of training into them. We have 2 employees that are fully qualified horticulturalists that we have trained under the Primary ITO apprentice training scheme. We have 2 further employees that have just completed their first year of their apprenticeship.
3. All of our staff lives within a 15km radius.

HOW INCREASES IN HEATING COSTS WILL IMPACTS OUR BUSINESS

1. The last 3-5 years have been the toughest we have experienced in this industry.
2. We are increasingly finding that we have to compete with imported product from low cost countries such as China, Malaysia, Thailand, India, and Equador. Not only do these countries have lower costs but many have government subsidies as well.
3. Increases in heating and compliance costs will potentially make growing flowers with heating unprofitable and this will destabilise our whole business.
OTHER FACTORS

1. I note in the proposed plan. It gives guidelines for chimney stack heights for wood pallets, diesel and gas. There are no guidelines for coal. Is this an omission?
2. Having operated our heating systems for up to 10 years without any complaints from neighbours or being visited by compliance officers from ECAN and operated under the current guidelines of ECAN we should be given automatic Resource Consents because of existing use.
3. We are surrounded by houses on 4 hectare blocks in a Non-Clean Air Zone that have no restrictions of what or how efficiently they use their log or multi-fuel burners. Meanwhile we under the current regulations comply with all that ECAN has required of us in the operation of our heaters.
4. Our Coal merchant has been very active in holding seminars and workshops to aid in the clean and efficient operation of our burners.
5. Within the last 12 months we have had our burners inspected by a Specialist Combustion Engineer to the view of increased efficiency and clean burner operation.
6. We are cognisant of the fact that clean efficient operation of our heating system translates into a saving in cost.
7. We also agree that clean air is important for the community at large but suggest that smoke and particulate matter comes in a large part from domestic heating and diesel vehicles.
8. We are concerned that the Regional Council will stifle industry and small business in the Canterbury region that will have a negative effect jobs and incomes.

RECOMMENDATIONS

1. Coal burners under 1 megawatt remain at Status Quo. No Resource Consent needed for coal burners of this size in a Non-Clean Air Zone on land area of greater than 3.5 hectares.