

Submission on the Proposed Canterbury Air Regional Plan

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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:

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

A

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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: Garth Gould

Date: 28/4/2015

(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

[illegible]

Add further pages as required.

Submission on Proposed Canterbury Air Regional Plan

1. It is apparent that since 1988 the number of times PM10 omission concentrations have exceeded the National Environmental Standards for air quality in Christchurch have been on a decline.

The operative Air Plan has obviously had a beneficial effect.

It is, disappointing that a more aggressive stance has not been taken by Environment Canterbury in administering the plan, which may well have resulted in a more spectacular improvement.

The desirability of compliance with the existing regulations, will only be conveyed to a certain percentage of the population if enforcement procedures are initiated in the form of prosecutions and fines.

There have been no prosecutions taken to enforce the existing Air Plan.

I am unaware of the number of offence notices that have been issued, but I suspect very few and there is no anecdotal information of inspectors circulating the city on nights of high pollution requiring citizens with smoking chimneys to desist or issuing notices of infringement.

A few small steps in this direction, accompanied by appropriate publicity could have a most beneficial effect.

2. A fundamental and practical matter is the necessity to use dry wood. Many households cut and collect their own wood in the January-April period and this is totally unsatisfactory for winter burning and probably accounts for a high percentage of the excess emissions.

Prosecutions for using wood with an excess moisture content above 25% would encourage the use of storage and eliminate this source of pollution.

In the evidence produced to the hearing panel for the existing Air Plan, the example of an Australian Township was cited which eliminated its pollution problem by enforcing "dry wood" requirements on wood burner usage.

This simple step, for which measuring techniques are available and the vast majority of which could be achieved through the wood merchants, would probably almost eliminate the present problems.

3. Environment Canterbury is in a difficult position, in that from a legal point of view it is obliged to comply with the National Environmental Standard for Air Quality (2004) (N.E.S.A.Q), i.e. no exceedance of PM10 on more than 3 nights per annum, exceedance being 50 mcg/m³ per 24 hours and a mean annual level of 20 mcg/ m³. The World Health Organisation on whose recommendation the N.E.S.A.Q was based, suggested an annual mean average in preference to a 24 hour one.

Subsequently the World Health Organisation has revised its previous recommendation in a Review in 2013 now deciding that P.M. 2.5 is the more vital pollutant and consequently the basis of N.E.S.A.Q is faulty.

The Parliamentary Commission for the Environment Dr. Jan Wright has picked up on this situation and delivered a recent paper on the subject to Lincoln University (copy **attached**).

4. In view of the above submissions it is suggested that the proposed Regional Air Plan be amended as follows:

- Amend option 3 pg 4/65 of Proposed Air Plan as follows:
 - Delete para 4 and insert new para 4 as follows:
 - Prohibit the use of older style (non complying) wood burners from 2025.
 - Delete para 5 and insert Prohibits the use of wood burners 15 years and older from 2025.
 - Delete paragraph 6 include a new rule to prohibiting the use of inadequately dried wood.

These amendments would enable the authorities to give further consideration to the issues raised by the 2013 World Health Organisation report and to reconsider the structure of the N.E.S.A.Q regulations and the comments of the Parliamentary Commission for the Environment.



G.H. Gould

28/4/2015

Date:

Pollution guidelines outdated

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Canterbury's air pollution problem is not as serious as the Government's "outdated" rules indicate, the parliamentary commissioner for the environment says.

Dr Jan Wright described air quality a "good news story" in her analysis of the 2014 air domain report, which analyses changes in air quality over time and the associated pressures and effects.

Air quality was steadily improving, unlike other environmental problems, such as water quality, she said.

Presenting at Lincoln University this week, Wright said the Government's air pollution standards, based on the "PM10 rule", were "10 years out of date".

PM10 is particles of less than 10 microns in diameter.

In New Zealand, the standard is to measure whether PM10 exceeds 50 micrograms per cubic metre in 24 hours.

The Government says areas of high pollution, like Canterbury, can have no more than three exceedance days a year by next year. The Christchurch airsheds had 19 last year and one so far this year.

Wright said this is the measure of "least importance".

"The WHO [World Health Organisation] is clear that the long-term exposure guidelines are more important than the short-term exposure guidelines because the health impact on the population is greater," she said.

In the 2014 air domain report, 50 per cent of airsheds failed under the PM10 rule, including all in Canterbury and most of the South Island.

Kaipoi, Ashburton, Reefton, Dunedin, Gore, Ashburton, Alexandra, Invercargill are just over, with smoggy Timaru failing badly.

Wright said if the measure was adjusted to "long term" PM10 exposure, over 365 days, 87 per cent would pass, including Christchurch.

PM10 comes from combustion, including home heating, diesel

66 Air quality is a public health issue and should not be in the domain of regional councils.

Dr Jan Wright

cars and industry, sea spray, dirt and sulphate.

If an Australian assessment process was used, Christchurch air quality would be the second-highest standard of "good", she said.

Wright argued the measure "of most importance" was whether PM2.5, which was much smaller and capable of penetrating respiratory systems, was high over a longer period.

Air quality was a public health issue and should not be in the domain of regional councils, Wright said.

"The effect is on health, not on the natural environment."

"[It] would be counterproductive if, for instance, actions to reduce emissions from woodburners resulted in more cold, damp homes. It may be that public money spent by regional councils subsidising clean heat appliances would be better spent on smoking cessation programmes."

Minister for the Environment Nick Smith said air quality would remain with environmental issues.

"There are lots of environmental issues like water quality, pesticide management and other environmental regulations that have an effect on public health, but that does not mean they should not be managed by the [Ministry for the Environment]."

Environment Canterbury air director Katherine Trought said Wright made it clear in her report reducing "high pollution days" was still integral to air quality.

ECan was still bound by the Government's PM10 rule of 24 hour measures, she said.

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PROPOSED CANTERBURY AIR REGIONAL PLAN
ENVIRONMENT CANTERBURY

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