

From: [ECInfo](#)
To: [Mailroom Mailbox](#)
Subject: FW: Consultation Document EMAIL:05770641
Date: Wednesday, 3 June 2015 12:59:05 p.m.
Importance: Low

hello,

Please see the below submission for the pCARP.

I understand that the period has closed, and I have advised that the customer should wait for the SODAR to be release in order to make a meaningful submission.

If this could be trimmed as reference?

Cheers

Hamish

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

From: Collins Peter
Received: 31/05/2015 11:49 a.m.
To: ECInfo; Environment Canterbury; Services Customer; Services Customer
Subject: Consultation Document

Hi, I have just read the consultation document and though it is past due date, I wish to show my support for what ecan is doing, and for having such an open consultation policy.

I am
Peter L Collins
239 West Belt Rangiora 7400
03 313 0337, mobile 021 131 6309
peter@peter-collins.org



31 May 2015

I am happy to discuss my submission in person if you wish.
My contact details may be made public.

I am delighted to hear that tighter regional air controls are being formalised, including an improved standard for wood burners.
I support the idea of approving woodburners which can achieve better results by

being adjusted and by having further improvement with suitable additional equipment.

I submit that I want to be able to use additional equipment and adjustment methods to obtain better outcomes.

About ten years ago with the support of a registered heating engineer, I removed an open fireplace and installed a Woodsman inbuilt wood burner to which the engineer sized and subsequently tested and reported on an after-market heat exchanger comprised of a triple-flue - primary combustion products up the innermost flue; cold air from outside passed through a zero box then up the outermost flue maintaining a cool exterior to the system; that air is then redirected down the plenum between the inner and second flue, reaching typically above 250°C and enters the firebox as pre-heated combustion air. Once the system has heated up (with fierce burning in excess air) no visible exhaust can be seen apart from heat haze. I was dismayed to hear that when I replace the stove, I might not be permitted to continue to use this most effective (though more expensive) system.

I want Environment Canterbury to leave a route open for use of after-market equipment (such as pre-heater heat exchangers or electronic precipitators) to be used with woodburners, **and** to provide for an economical route to having the effectiveness of such equipment demonstrated in-situ. Sampling flue discharge gases throughout the burn cycle is surely all that would be needed, if our aim is to improve air quality.

I want Environment Canterbury in relation to wood burners, to concentrate on air quality and in effect to ignore efficiency as such. My reason is that very efficient burners can still be bad particulate generators. Don't put the cart before the horse. After all, a burner that supports good air quality cannot help but be efficient. So push the air quality issue, and let the designers and installers worry about the efficiency. After all, measuring the particulate profile can be done anywhere, in situ, whereas assessing efficiency is very complex, expensive and as we know, often a poor predictor of practical air quality outcomes.

Regards,
Peter

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