

Tabled @ Hearing

28.10.2015

J ODERING

Submission to the Hearing Committee on E Cans proposed Canterbury Air Regional Plan

May it please the hearing panel.

My full name is Julian Russell Odering I am a Director, Shareholder and property manager for Oderings Nurseries Chch Limited, We operate five garden centres and two nurseries in Christchurch and five garden centres and one nursery in the north island. In Christchurch alone we employ 117 staff. That number swells to 170 in spring. I reside at 62 Stourbridge Street, Spreydon, Christchurch adjacent to the exit of the main nursery at 92 Stourbridge Street, This nursery covers an area of 7 acres where we grow over 4 million plants per year in greenhouses that are heated by 1 750 kw coal fired hot water boiler and 3 x 165 kw coal fired hot air burners The site has been operational since 1929. We have always used coal fired boilers for heating greenhouses and the reason for my submission.

Site plan of nursery refer last page

With the event of the RMA, the clear air license that we operated under was Revoked and we had to apply for a discharge to air from the then Canterbury Regional Council in 1997.

Unfortunately we were assigned an investigating officer, with a honors degree in soil science and limited knowledge of air quality issues. She had backup from a colleague with little experience in ausplume modeling.

Leading up to the hearing, their modeling of our operation was out by factors of 10. The investigating officer wanted to grant our application for a duration of 18 months only until we investigated alternative fuels, heating or new locations.

We were very fortunate to obtain Dr Terry Brandy with a vast experience of air quality matters at the hearing. He showed the 2 investigating officers how to do their modelling correctly and we eventually got our consent.

The whole process put my father and I through extreme anxiety and time we could ill afford. The overall cost to the company was over \$80,000 dollars with many court of appeal appearances which ended in our favour.

With the proposed new air plan and due to considerable confusion in the industry, I wanted to make sure our existing consent that we obtained in 1997 and expires 26th March 2034 was not affected under the new proposal.

Christine Butler senior advisor officer from E Can assured me our consent would not be affected. However my concern is when our consent does expire we may not be able to renew the consent in its current form without considerable expense and more anxiety.

In my initial submission after consultation with Dr Terry Brady he wrote his concerns with rule 7.14 within a clean air zone the discharge of PM10 into air from a large scale burning device, where concentrations of PM10 will likely equal or exceed 2.5g/m³ at ground level at or beyond the boundary of the property of origin, is a restricted discretionary activity provided the following condition is met.

- 1. 100% of the discharge will be off-set within the gazetted airshed in accordance with regulation 17 of the resource management (National environments of standards for air quality) regulations 2004.
The exercise of discretion is restricted to the following matters:*
- 2. The proposal to off-set 100% of the emissions within the gazette airshed to ensure that there is no net increase of PM10 emissions; and 2 the matters set out in rule 7.2*

As it is currently written, this rule applies to all discharges including those that are lawfully consented. We understand that the intent of the Rule is to mimic the requirements of Regulation 17 that actually applies only to increments of PM10 into a polluted airshed. This means that as currently written, all lawfully consented discharges will be required to reduce their discharge to achieve the limit of 2.5 g/m³ by way of offsets as soon as the rule comes into force.

Furthermore, Regulation 17 requires a discharger to reduce the offsite effects to less than 2.5 g.m³.

The current rule requires 100% offset that is in conflict with the regulation. Also, the present wording does not allow explicitly for the

*replacement of existing discharges with similar discharges that may result in the exceedance of the 2.5g/m³ limit but still may be able to reduce the total discharge into the airshed by significant amounts
E.g. 50% of existing lawfully consents discharges when it comes to re-consenting.*

This is why I wanted clarification on our existing consent as I believe not one coal fire boiler in Canterbury will be able to reach proposed new E Can emission standards. Certainly ours will not.

Coal is an economical indigenous fuel that supports jobs for many hard working New Zealanders.

Where our competitors hire from overseas to improve their profit margins we are fortunate to have coal to offset high production costs. Furthermore growing plants for spring our busiest time of year requires a lot of heat and at approximately 4c per KW for coal as opposed to gas or electricity at 0.16 to 0.22c per KW makes those alternative options prohibitive for the amount of greenhouses we have.

Also heating comes at a time our industry can less afford it, in winter, therefore it is in our best interest to maintain our boilers efficiently and only when required.

In the past 18 years of our consent we have had no complaints from either E Can or our 40 neighbours.

Furthermore we have the benefit of doubled skinned greenhouses with thermal screens and endeavor to grow cooler loving crops.

Oderings have always complied with our consent and coal usage is always well under what is permitted for our activity.

In fact because Oderings grow so many plants it could be argued we have a negative carbon footprint.

It is well known that people live close to where they work and industry is not the greatest air polluter as E Can knows.

I watched with interest TV One news 6pm 22nd October (Under a clean green image) "Transport and industries air discharge emission are down hence air quality has remarkably improved since 2006."

If E Can is concerned about Global warming. New Zealand only contributes 0.75 of all global greenhouse gases and over half of that is from diary industry.

In conclusion PM10 levels of 2.5mg per m3 at ground at level at or beyond the boundary are unrealistic for industry with coal fired boilers to achieve and doubt either transport or domestic heating could accomplish such a target for discharges that are close to ground level.

Therefore I seek to delete or amend rule 7.14 to allow a right of renewal, to expiring discharge to air consents with extention of existing rights, under the previous consent.

Thank you for hearing my submission.

Julian Odering



3 x 165 kw Hot air burners

1 x 750 kw Hot water boiler