

Submission of John A. Wright on Proposed Canterbury Air Regional Plan

This submission has four objectives:

#1 To highlight shortcomings in the proposed approach

#2 To ensure that it has as its objective improved air quality, not just a rationalisation of an evident bias against solid fuel home heating.

#3 To seek a commitment to expand research and monitoring so that all sources of pollution are acknowledged and reduced, something that is glaringly absent in the Proposed Plan

#4 To seek a commitment that no further restrictions on home heating are imposed before the issues of fuel poverty have been dealt with in a practical way, and not just assuming that this issue can be swept away by a quote “managing it by a cross sectoral response”.

#1 Shortcomings

Very few hard facts e.g. number of pollution days ambient pollution levels, pollution levels in differing weather conditions.

Very few monitoring stations. particularly in Polluted air sheds.

No serious attempt to isolate and monitor commercial and vehicular emissions, even though these are probably both on the rise and significant contributors to ambient pollution levels, in all weather conditions.

While this is an Air Plan, no real attempt to provide cost / benefit analysis with regard to reducing home heating options. There has been significant media and coronial comment on the contribution of cold damp housing to health problems contributing to deaths of toddlers and others. How does this outcome compare with the benefits of reducing just one source of pollution?

#2 The main omission is any policy or action regarding vehicle emissions. While they are acknowledged and even estimated to be up to 20% of pollution, (probably a conservative number) by the time we get to section 4, Evaluation they have disappeared from any attempt to deal with the issue.

The second weakness is the understanding and underestimating of pollution from rural burning.

The main problem is NOT the seasonal burn off of grain crop residue, which is generally fairly dry and burnt over a comparatively short period in the autumn, but the ongoing almost continuous burning of shelter belt and hedge clippings.

These tend to be burnt while green, sometimes within a day or two of cutting, using some form of accelerant as a starter. Even more of a concern is the removal of shelter belts and plantations for dairy conversions. The vegetation and stumps of these tend to be bulldozed into heaps mixed with soil and then lit, with the ability to smoulder and smoke for weeks or even months. This activity seems to be ignored by ECAN, even when right in or up to the urban boundary and complaints are made. You can perhaps understand my comment about this being a anti home heating plan when ECAN announced it would be patrolling Rangiora streets looking for smoking wood fires when at the same time these smouldering piles were issuing forth smoke 24/7 for weeks.

#3 These are, I believe, serious weaknesses in the plan and the attempt to improve air quality. The vehicle fleet is increasing every year, the percentage of diesel powered vehicles is increasing, and short running, increased congestion and longer trip times combined with lower quality diesel, and inappropriate (in many cases) lubricating oil these vehicles produce a higher level of pollutants particularly in the pm2.5 range than they should if run to manufacturers standards.

There needs to be some serious research in this area, and if necessary dialogue with central government to ensure that we clean up our fleet so we can clean up our air.

Some tighter rules around rural burning, that are enforced, would help this problem immensely.

Basically if it isn't dry enough to float with 25% of its mass above water it's too wet to burn.

Soil should be at a minimum in burn heaps

Simple and enforceable.

#4 No further restrictions on home heating until viable, affordable options are available Fuel poverty is a real issue for those on low and fixed incomes, and for many working families. Theoretical bureaucratese such as “cross sectoral responses” will probably produce enough paper to warm and insulate every home in Canterbury if correctly applied, but there will be no practical benefit.

I have a real problem with those who would freeze our elderly and infirm to justify a position which can only be upheld by ignoring other sources of pollution which can give us high reading on 25 + degree days when not a log burner is going.

Conclusion.

The outcome I would like to see as a result of this submission is:

Better monitoring and research.

More education and an agreed set of rules for rural burning.

A hold on any further tightening of home heating rules until the previous issues have been dealt with.

John A. Wright