

Rebuttal evidence Sect 42A report: Various aspects detailed below
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4. General submission

Page 4.1

CRC's avoidance of transport emissions management by regulation: CRC statement is a cop-out for their discriminatory / restrictive action against solid fuel space heating users particularly in pollution Clean air zones (Airsheds=ASs) where transport use is at significant concentrations. All emission sources should be part of CRC's programme for meeting NESAQ if that be indeed the aim. Control of solid fuel burners is just easy pickings for CRC from a target and control point of view. If the transport industry is so wonderfully in the hands of other agencies and "other work programmes that the CRC leads / is involved in" then why has CRC not also left Wood burner (solid fuel burner) regulation in the agency of the respective Clean air zone (ASs) local councils who can much more appropriately deal with ratepayers (clients) directly in the certification/compliance process?

The classic point and example No.1 are the pCARP hearings...held in Lincoln??? Oh or Timaru. How am I supposed to easily get to Lincoln if I don't have a car or all day to negotiate the less than ideal bus system? Just imagine all the pollution of everyone in the districts under the impact of pCARP having to drive out to Lincoln and Timaru for this whole process. What happened to the requirement for public meetings to be easily accessible by all the general public? My local council in Christchurch provides Services centres for rate payer's convenience in most public libraries...i.e. easy for their 'clients' to get to and deal with things.

If transport emissions are deemed to be "better managed" outside CRC's regulatory atmosphere then I can wholly advocate CRC appropriately also handing the regulation of solid fuel burners for space heating over to the more appropriate authority of my local council please.

Classic example No.2 I have tried to contact Ecan twice by phone over wood burner issues this year. I have not yet had any phone contact in return from the Clean Air department. Leniency forms just turned up in the mail about a month later. These were filled in and sent with the form's written assurance of 10 day response...that was 5 months ago...no response. A totally inappropriate agency for dealing with my local wood burner issues.

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- Financial assistance: "...provided for through long term and annual planning processes." Not found operating in CHC city this year (for a low income ratepayer). Currently I have not found any financial assistance/provision for my wood burner replacement – my main source of space heating, water heating and cooking through the entire winter. I would be pleased if CRC could elaborate on where I'm going to find \$11,000 for a replacement ULEB.

CRC discounts the need for more monitoring/differing focus of Clean air zones (ASs) areas: "...not need to be provided for in the Plan." But wait pCARP's structure and targeted Clean air zone (ASs) and their vast boundaries are all based on exacting science and monitoring data??? An article in The Press dated Jan 2012 claims there's only one full time monitoring station in the entire Christchurch city with the occasional monitoring for other locations. This in my opinion, from a science point of view, is appallingly vague and will not serve the purposes of the wide and varied suburbia of the City

of Christchurch.

PM10s are a total measurement with assumptions as to the wood burner influence on these concentrations...again this makes the pCARP outcome highly questionable when and if it is CRC's noble aim is to keep the NESAQ requirements which must obviously then be equally if not more vague then CRC's monitoring programme...that is if CRC's claim to have meet these requirements is true. See statement: "Beyond monitoring required for the purposes of the NESAQ..."

11. Rules:

CRC comments on page 11-6 "Rule 7.76 provides for such enforcement action."

I disagree Rule 7.76 gives no indication that compliance issues will be taken more seriously than that of the past. The obvious failure (in my winter observance) of the previous and actually adequate rules on smoke emission is simply because ECAN has done little to control compliance. We now have slightly more elaborate rules, but we still don't have any mechanism to combat the failures of the past...smoke. Just the same old "...is a prohibited activity". Where is the necessary escalation in audit and enforcement to actually bring the regulation into line? It appears the CRC is again going to fail to actually control discharges of contaminants as it so valiantly claims in "imperative observance" of the NESAQ. Instead CRC is fluffing around at the nuts & bolts end forcing their opinion on specific levels of home living equipment on the residences of Canterbury. (See also Part 15 space heating Page 15-10 comment).

Imagine phasing out all cars and expecting people to catch taxi's because some drivers won't stop drink-driving! No, the police ramps up compliance enforcement so that those of us who comply can carry on doing the things we love to do...safely.

15 Space heating submission and analysis

Page 15-3

CRC's comments to submitters seeking provision for requiring "...adequate storage of wood."

If wood gets wet i.e. there is no adequate storage at the property certified with the installation of the most fanciful UUULEB, you will get smoke - common knowledge!! This is no longer at the wood merchant; this is now at the point of discharge. I strongly disagree with CRC opting out on this submission as it is well and truly directly related to most of the smoking chimneys around my district. Homes approved for ULEBs / LEBs should also come with the requirements necessary to support successful discharge at design level. One of these is sufficient stock of dry wood and therefore storage of stock otherwise it will get wet. Without this the likelihood of smoke is in my opinion and experience is very high. This should be a high prior for CRC's provision making to achieve real results.

15 Space heating within Clean air zones

General submissions

Page 15-10

...timeframes for requiring wood burner upgrades: "...provide maximum time for the community to change,..." I found out last year that I had to change in urban Christchurch. I began the process of quotes early this year and then this pCARP came out appearing to enforce that I can no longer have a wood burning device installed to replacement my old wood burner. I have not been able to afford the quotes given so far in this year nor is there any financial support for replacement burners

available to me even though I have a community services card. I disagree and question the fairness of the timeframes given.

Part 15 Space heating within clean air zones page 15-10 where CRC's highly questionable and largely subjective mandate to "...require a shift to the best practicable option for home heating within Clean Air Zones..."

15 years throw away for an installation such as a wood burner is impractical and a waste of home owner's money...and actually has no direct resultant on discharges that eventuate from the appliance...so CRC should apply the same "... beyond the powers and functions and duties under section 30", aka discharges into the air quoted under amendments to Schedule 7 Part 1 –Installation see page 15-8 . and therefore change its attitude and implement a condition of fitness test/inspection as I have submitted.

(See also 11. Rules comments relevant to this overly mandated nuts & bolts approach)

I refute CRC's statement on Page 15-15 where it claims "...requirement to replace older style burner 15yrs and older...in place in Christchurch clean air zone since 2002."

Written in this manner means older burners over 15yrs **had** to be replaced from 2002. Not correct.

I refute CRC's statement on Page 15-19 where it claims "The requirement to replace older style burner 15yrs and older...in place in Christchurch clean air zone since 2005."

Written in this manner means older burners over 15yrs **had** to be replaced from 2005. Not correct.

As far as I know there was no active validated plan requiring replacements for many of the formative years nor did it become 'a requirement' to replace until 2009 when the requirement to no longer use an old burner become effective. Then relief was granted in Christchurch in 2010 due to the unsurpassed upheaval of earth quakes. I didn't hear of the requirement again until last year.

Rule 7.87 Page 15-19: Thirty nine submissions were made relating to this rule. I think that is a significant number and obviously Christchurch home owners have serious issues with the provisions of this rule. However CRC has disregarded all but one of these submissions. This is appalling.

There are still an awful lot of people in Christchurch struggling with the normality of life since 2010. I can imagine they, as I am, are deeply hurt with the 'no room in the inn' status being slapped on us with the apparent need to make "space" in an "over-allocated airshed" for other PM10 source polluters such as industrial activity. I'm sure industry of many forms is necessary in a city...so where would you like me to go for the winter to keep warm while we appear to be so "over-allocated"? Christchurch home owners need more "space".

I am now actually sickened by the term "airshed" being used by CRC in describing the beautiful city where I live after reading this their determination on capacity provisions or the lack thereof for me a person with a traditional lifestyle that I enjoy.

I request that CRC immediately ceases from referring to our city of Christchurch by a most degrading term "airshed". I now find this offensive.