

15 minutes to speak - Hearing 25 Nov 15

Intro - GV sub #54553 Clean air plan specific – space heating – woodburners

Oppose some parts per subms & have filed rebuttal evidence

Specifically – Chp 7. rules space heating (see sub for details)

- Chp 8. Schedules, sched 2 assessment of offns/object' effects...(smoke).

Profile: Home owner, Bishopdale/Harewood , single occupant

Low disposable income, community services card holder

Free/gathered firewood every year – CHC garden city, tree pruning/removal work provides regular

Note – completely renewable carbon neutral; ticks boxes for world future survival and indeed

under the RMA section 70A gives ECAN function to recognise comparative benefits of wood burners

I use wood burner all winter heat whole house, hot water, large portion of cooking, actually up to

5-6mths of year, ticks more of my personal survival boxes than what pCARP provides me with.

Points & summary: [in further support of may submitted items-Submission 15 Apr+Rebutt' evid' 8 Oct]

A. **RMA section 30** responsibilities/functions on “discharges of contams’ to air..”: We have before us a pCARP with the prescriptive “Phasing out” (get rid of) the currently apprvd Low E burners(LEBs)...which technically has nothing to do with emission when used properly they’re an excellent clean form of heating. This follows the on-going regulations they’ve enforced on the people of CHC with respect to type and age of wood burning home heating device...all of which have no direct effect on actually controlling discharge of contams’ under RMA Sect 30.

[**Ref pCARP Sect 42A report Chp 15 space heating pg 15-2**] Yet when submitters Puentener, Gallagher & De Lacey (**pg 15-7**) seek the control of wet wood /treated wood sale and other submitters (**pg 15-3**) request provisions for adequate storage of wood, we get the same old but complete opposite use of RMA Sect 30 quoted by ECAN... now to ‘discharge’ themselves of any responsibilities for things they don’t want to do as it suits them lacking any consistency or relativity. But wait the AKL reg council test findings quite disagree...even the old wood burner tested fared well in the cause of discharge stakes but wet/damp wood takes the prize by comfortable margin at a whopping 70% more particulates than dry wood[ref next pg submtr B Andersons evidence].

My submitted material supports experientially that ECAN show a deep confusion with respect to their function and control over discharges from home heating devices ie smoke.

While I’m on RMA Sect 30, ECAN refused several local council’s change requests in outdoor cooking [**policy 6.18 pg 12-4**] by quoting that additional adverse effects of cooking wasn’t anticipated as most likely only done during summer yet here in **Sect 42A report pg 15-10** it refuses the Association of independent Research’s provision for use of all wood burners outside of winter months for reasons of its own opinion/predictions of what the public are most likely to going to do and what ECAN wants to force them to do **at a cost I can’t afford ie if you must burn wood get yourself a ULEB** , and with some apparent difficulty they foresee with enforcing NESAQ observance...how does that all fit into brief of the Sect 30 I ask?

B. I don’t see any health issue with air quality in my neighbourhood nor have I yet found any specific data from ECAN to prove/support an issue that would warrant that I should immediately spend \$9-24,000 for my home heating, water heating and cooking and to start paying to have all my free wood removed from my own and various clients/friends properties...did anyone else put that in their estimations of the cost of banning my perfectly good serviceable wood burner? I didn’t see it.

- C. My personal circumstances prevented me from carrying out any immediate changes to attempt to comply with ECAN's ever evolving regs' on woodburners. I've had a family situation, my only remaining parent my Father's care/estate issues through Alzheimer's and then his death in late 2013. I left full time employment to deal with it. I finally got into researching and quotes on replacement heating at the beginning of this year (can provide all the quotes as proof) but found my regular income doesn't provide for that this year. I now find pCARP, if accepted as is, will back date to a date prior to me even being able to read it??(Local Libraries didn't get copies till after 28 Feb 15). I find this a ridiculous compliance...unworkable. After ringing ECAN I sent in their 'leniency' request form in May this year...no response from ECAN.
- D. I'd like to touch on some other info supplied by other submitters but publically available that relates to the topics in my submitted items.

- **DHB CHC HIA reports 13, 16, +17(Environet Ltd)**-ECAN website: pay much credence to the plight of residence like me who obtain free or self collected fire wood, have a dwelling older than 50 years and the physical and mental health issues with being cold due to the fuel poverty I feel ECAN is railroading me into; I estimate my heating costs per year would go up \$1200-1500. That's a huge portion of my current income. But wait, it will also require either a capital cost of \$9000 for x3 heat pumps(equivalent output to a LEB or my old burner)+ \$200-300/yr wood removal or a staggering \$13,000 for installation of a ULEB and from what I see of the outputs (which are much lower than a good LEB) maybe x2 at around \$24,000. Sadly the Recommendations of the **DHB review of pCARP, report 13 page 17** although aware of the "timing of changes" issue seem to offer a rather publically meaningless statement on 'mitigation' measures followed by a broad spectrum but intangible list of who would be responsible for this. It seems to conclude: I will be best to get a heat pump or two and apparently with somebody out there making "Support and incentives made available..." will pay for the extra \$9-24K and up to \$1800 per year hmmm.... the obvious health issues with ECAN's pCARP are tabled but as to the DHB's grasp on the practical realities of the CHC public I have my doubts.

- **Submitter Mr Brian Anderson's evidence** kindly supplies us with a copy of '**The state of air quality in NZ' commentary by the PC for envrnmt(Dr Jan Wright) on the '2014 Air domain report'**...and includes a very interesting **report by the AKL Reg' Council in Oct 2010**. So why didn't ECAN furnish us with such an up-to-date report? Ah maybe as the Commissioner's findings are certainly not a stunning herald of this pCARP on wood fires and poses the periodically changing question: what should we really be "worrying" about?...ie the PM10 PM2.5 question and indeed the whole air pollution as an environmental issue...quote:"..., it does not look like an important environmental issue."**(pg7)** and hence a recommendations to review the NESAQ**(pg52)**.

It was also lovely to read heart warming statements such as "Indeed, log burners have much to commend them." **(pg6)** Not to forget the obvious point that ECAN have straightly dismissed as not on their Sect 30 mandate: "low emissions closely link to dry wood while high emissions link to wet or damp wood"...effects on particulate emission rates of more than 70%, the highest factor!!! **[Key results of the AKL reg' Council report Oct 2010** in testing carried out at Spectrum Labs Ltd **pg27-28]**. A great outcome on the realities of wood burner smoke. But more enlightening was the "unexpectedly low" emissions factor from the "old burner" used in the testing...all these aspects do not consent with ECAN's approach. I've just heard this morning from a CEA(community energy action)consultant that ECAN has

as yet failed to prosecute anyone in CHC on wood burner smoke... so why hasn't enforcement and the previous plans been successful we still ask? The AKL report clearly points to burner 'use' not 'type' for smoke. Let's compare other Govt depts: the road safety enforcers; imagine if no one was prosecuted for speeding or drunk driving? Both bad for the health of others. Would banning motorcars that are able to be driven drunken work? Or maybe cars that can't speed? Would we do away with periodic WOF tests for cars and just make the public throw them away every 5yrs? Even 15yrs would be ridiculous. ECAN's approach/lack of achievement on compliance does not align with other Govt' depts.

- Then there's the **Mr Moller & Sir David Hay's evidence** for their submissions... they sound like people who know what they're researching...and hence talking about. Again the obvious health risk of going cold, costs and a stunning quantity of detail that clearly puts ECANs dictatorial stance on wood burner compliance in question.

Conclude:

While the whole clean air process run by ECAN has been intimidating and stressful for me I know I'm not the only one. Personal friend Mrs X scenario ...80yr old widow: up at 6am to light the burner set up carefully the night before, wouldn't burn during the day survive on the first load up only and huddle in one room at night with her cardy & jacket on, worried about detection of smoke every time...she had an apprvd(Lady Kitchener-very good) burner and always had dry wood. She managed a couple of years this way; didn't cope-family had to take her in at another city down south where she is now happy fulfilling the task of stocking the wood for the log burner! I am also comforted by the large majority of other submitter's that are opposed and have honest issues with approving this pCARP on the table today.

But more importantly what am I going to do? I'm hoping that my coming here today as a simple resident of NZ trying to live life will have a positive impact on you the commissioners of the panel, that you might know what is going on with actual real life situations and realise what impact your decisions will have on me personally.