

**Officer supplementary response to question 26 of the Panel<sup>1</sup> (to be inserted following paragraph 133 of the Reply Response)**

I have reflected on the wording of point 1 of the "Enclosed Burner Design" requirements in Schedule 8 and consider that amendments could be made to improve the clarity of this requirement and better achieve its intention.

The wood burner authorisation panel have been working with the wood burner manufacturing industry to move towards automation on these appliances but so far that has not been possible in New Zealand manufactured appliances. Until that technology can be manufactured in New Zealand, the authorisations Panel have taken the view that the manual operation of those ULEBs that have been authorised is acceptable.

In order to ensure the wood burner authorisation panel can continue to work towards full automation with the manufacturing industry, while ensuring there are ULEBs on the market and approved for installation now, I recommend the following amendment to Schedule 8 on Page 8-32, under the heading "enclosed burner design":

1. *The burner cannot reasonably<sup>2</sup> be operated in such a way as to bypass the technology (taking into account changes in available technology)<sup>3</sup> that results in ultra-low emissions.*

It should be noted that Schedule 8 took legal effect when has only had statutory weight since the pCARP was notified in February 2015. Prior to this, ULEBs were authorised as meeting the , and the NRRP is still the operative document. The relevant requirements of the NRRP. These requirements (Rules AQL9B, AQL81B and AQL92A) do not include design requirements, but rather require that "real life operation" is considered as a matter of discretion.

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<sup>1</sup> Minute 4 of the Hearing Panel issued 24 March 2016

<sup>2</sup> 11 - Morrall

<sup>3</sup> 11 - Morrall