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Submission on the Proposed Amendments to the Air Quality Standards

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1. Preferred Option

Option 4A Proposed amendments	<ul style="list-style-type: none">• Increase the permitted number of exceedance of the PM10 standard from one to three exceedances per year• Exclude exceptional events from counting as exceedances of the PM10 standard• Extend the timeline for compliance to 2018• Require mandatory offsets for new industry consents in breaching airsheds after 2018.• Introduce mandatory reporting of PM10 monitoring data• Use existing ministerial powers under the RMA 1991 9section 27)• Establish an air quality compliance strategy
Are you in favour of these amendments?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Reason/s	<ul style="list-style-type: none">• The extended timeline of 2018 gives a real chance of clean air wood burners to make an improvement to air quality.• New industry consents can still be allocated provided they themselves don't breach air quality standards, or if they do an appropriate offset is made by replacing non compliant heating appliances with compliant heating appliances.• An effective air compliance strategy is essential to achieve air quality standards (see our proposed strategy below)•
Are there any changes you would like made to these proposed amendments?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, what are these changes?	<ul style="list-style-type: none">• Our big concern is there is no mention of education in the above option. This is absolutely imperative to get the message home to wood burner users regarding the correct use/type of fuel, operation, "burn bright burn right" mentality and regular servicing. All these factors must have due consideration in order to improve old and

	<p>current wood burner emissions, and air shed air quality.</p> <ul style="list-style-type: none"> • A significant campaign (in terms of dollar spend and content) is required at either national level, or central government funding be made available at local government level (Local problem local solution scenario). This needs to be in the same vicinity as anti smoking and road safety levels. As the impacts of PM10 is highlighted as a health issue then central govt health funding could be indentified as a funding contribution (ACC levies?) • As part of the education process devalue the marketing strategy and public opinion that has become engrained in consumers minds that to have overnight burn is essential. • Introduce “Good Wood Merchant” initiatives. Along the lines of Nelson City Council (Tasman District?) • Recommend a strategy that inefficient open brick style fires are banned (as per ECan and Nelson Air Plans), and phase out old wood burners (15 years old) on a year by year rotation (up until 2020 when in theory all urban wood fires will be clean air type) • Introduce regular policing of the few dirty fires that unduly influence or bias the monitoring stations. These ultimately affect the majority of which may be using and operating a clean burning wood fire appliance correctly • Introduce checks and measures on established industry emissions? Not industry applying for new consents.
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2. Costs and Benefits

Have we accurately reflected the range of costs and benefits arising from the proposed amendments, and who might bear the costs or receive the benefits.	<input type="checkbox"/> Yes <input type="checkbox"/> No
If no, how can the estimates be improved?	
Are there any costs and benefits we have overlooked?	

Please provide any information that you would like to see included in the cost benefit analysis that will be carried out after the submissions are received and analysed.	<ul style="list-style-type: none"> • Hospital admissions due to PM10 inhalation versus poor/low temperature living conditions. • What effect will rising electricity and LPG prices have on households dependent on those fuels for heating.

3. Decision/s you wish the Minister for the Environment to make

Proposed Amendments	<ul style="list-style-type: none"> <input type="checkbox"/> Increase the permitted number of exceedance of the PM10 standard from one to three exceedances per year <input type="checkbox"/> Exclude exceptional events from counting as exceedances of the PM10 standard <input type="checkbox"/> Require mandatory offsets for new industry consents in breaching airsheds after 2018. <input type="checkbox"/> Extend the timeline for compliance to 2018 <input type="checkbox"/> Introduce mandatory reporting of PM10 monitoring data <input type="checkbox"/> Use existing ministerial powers under the RMA 1991 (section 27) <input type="checkbox"/> Establish an air quality compliance strategy
Other proposed amendments you would like the Minister to make.	<p>Air Quality Compliance Strategy</p> <ol style="list-style-type: none"> 1. Education Programme – <ul style="list-style-type: none"> • A significant campaign (in terms of dollar spend and content) is required at either/both national level (central government) and local government level (Local problem local solution scenario). This needs to be in the same vicinity, or level, as the anti smoking and road safety levels. As the impacts of PM10 is highlighted as a significant health issue then central govt health funding should be identified as a funding contribution (ACC levies?) • The message to domestic wood burner users should be targeted at the correct use and type of firewood fuel, correct collection and storage, correct operation, “burn bright burn right” mentality and regular servicing. All these factors must have due consideration in order to improve both old and current wood burner emissions, and air shed air quality. • As part of the education process devalue the marketing significance that has become engrained in consumers minds that to have overnight burn is essential. Again “burn bright burn right”. 2. Phasing out of Older Wood Burners and inefficient open brick masonry fires - <ul style="list-style-type: none"> • Recommend the phasing out of open brick fires and old wood burners (15 years old) on a year by year rotation (up until 2020 when in theory all urban wood fires will be clean air type) 3. Monitoring / Policing Offending Users - <ul style="list-style-type: none"> • Introduce regular policing of the few dirty fires that unduly influence or bias the monitoring stations. These ultimately affect the

majority of wood burner users who may be / are using and operating a clean burning wood fire appliance correctly

- Introduce checks and measures on established industry emissions and not industry applying for new consents.
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