

**Submission on Review of National Environmental Standards for
Air Quality**

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To: Ministry for the Environment
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Submission on Review of National Environmental Standards for
Air Quality

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Thank you for the opportunity to provide comment on the discussion document "Proposed Amendments to the National Environmental Standards for Air Quality, June 2010".

This submission is made by the Nelson Marlborough District Health Board (NMDHB).

Key Points

- That Option 4a is supported (conditionally in some parts).
- That Offsets must ensure improvement in the airshed, not just maintain the status quo.
- That there is no extension of time beyond the maximum proposed 2018 timeline.
- That PM_{2.5} particulates need to be included as part of the mandatory monitoring data.
- That Option 4b is not supported.

Submission

The NMDHB **supports option 4a conditional** upon the comments set out below under each clause contained within the option.

1. Increase the permitted exceedances of the PM₁₀ standard from 1 to 3 exceedances per year

- Supported (but note comment below).

Comment:

This proposal to allow the permitted number of exceedances from 1 to 3 per year is more in line with the WHO global guideline. However in accepting this more pragmatic approach to exceedances the evidence shows the trade off will be greater negative health effects (hospitalisations and increased morbidity/mortality) and associated increased health costs compared to the current permitted exceedance of one.

2. Exclude exceptional events from counting as exceedances of the PM₁₀ standard

- Supported.

3. Extend the timeline to 2018

- Supported conditionally.

Condition: The timeline extension is supported conditional upon no extension being considered beyond the maximum 2018 date.

Comment:

Extending the timeline means that we are accepting greater negative health effects and health costs from polluted air than would occur if the timeline for compliance remained unchanged at 2013.

Some Councils such as the Nelson City Council have actively worked to meet the standard and are to be congratulated for this. The extended timeline negates to some extent the effort these Councils and communities have done to comply with the 2013 deadline.

4. Require mandatory offsets for new industry consents in breaching airsheds after 2018 (ie do no harm)

- Supported conditionally.

Condition: The mandatory offsets are supported on the condition that they improve rather than just maintain the status quo in the airshed.

Comment:

There must be no principle or acceptance that pollution up to the PM₁₀ (50ug/m³) standard is acceptable.

Offsets must be applicable in the airshed where the new industry is to be established and occur over the same time period (i.e. offsets cannot be delayed until some future date).

5. Introduce mandatory reporting of PM₁₀ monitoring data

- Supported.

Comment:

In addition to mandatory reporting of PM₁₀ monitoring results there should also be mandatory monitoring and reporting of PM_{2.5} data so that future decisions on PM_{2.5} can be made based on robust scientific information. PM_{2.5} is particularly important in relation to health effects. Standards relating to this type of particulate should be included in the mandatory monitoring data.

In the absence of a PM_{2.5} standard the PM₁₀ (50ug/m³) standard allows a significant amount of PM_{2.5} to be present. Protection from this effect can only be achieved by aiming for PM₁₀ levels significantly less than 50ug/m³.

The current PM₁₀ (50ug/m³) standard is based on 24 hour time interval and as such does not take cognisance of an annual average. Thus it would be possible for an airshed to have poor air quality over the course of a year (with consequent negative health effects) yet not breach the 24 hour (daily) Standard. This is more likely in airsheds where the majority of the pollution is from vehicles or industry rather than household fires.

6. Use existing Ministerial Powers under the Resource Management Act

- Supported.

Comment:

It needs to be ensured that the Minister has adequate powers to enable any corrective actions where there is failure by Councils to meet requirements.


7. Establishing an Air Quality Compliance Strategy

- Supported.



Dr E Kiddle

Medical Officer of Health



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Dated at Nelson this 30th day of June 2010
