

RecordId	18
time_submitted	5/07/2010 11:39
Name	Kevin Hing
Organisation/Agency	New Zealand Timber Industry Federation Inc
Address	PO Box 308, Wellington 6140
Phone	04 473 5200
Email	kevinh@nztif.co.nz
In favor of 4a?	No
Reason/s	Mandatory offsets provide no flexibility for industries and councils in seeking solutions to breaching airsheds. This option is too prescriptive.
Any changes?	0
Suggested changes	
In favor of 4b?	Yes
Reason/s	This option has greater flexibility for the use of measures to mitigate particulate emissions in breaching airsheds. These measures may include the offsets which are mandatory in option 4a but there may be other equally effective measures that could be used within this option.
Any changes?	No
Suggested changes	
CB accurately reflected?	No
Any overlooked costs?	
Information you'd like included	<p>If industry is required to instal capital equipment to meet air quality standards rather than opting for buying offsets the considerable capital cost is required depending on the nature of the site and the degree of reduction in emissions required. Two examples of costs incurred that have been provided to the Federation are; 1 requirement to meet council requirements 2005/09 AEE/Consultancy/Staff time \$150,000 Emission related process improvements 2005/07 \$50,000 Scrubber installation 2009 \$450,000 Additional annual operating costs of scrubber \$60,500pa Annual testing and reporting \$12,000pa This site will be required to instal another scrubber at a similar cost to above to meet a staged reduction in discharge level required by the council. The council has a condition that allows it to review the company's discharge levels annually and there is also a restriction on processing volume which inhibits the ability of the company to expand. 2 a more recent example AEE/consent costs \$20,000 Planned scrubber installation 2010 \$642,000 Annual operating costs of scrubber \$65,000 Annual testing and reporting est \$5,000pa This site is facing a 30% reduction in discharge levels.</p>
Increase from 1 to 3	Yes
Exclude exc events	Yes
Mandatory offsets	0
No industry restrictions	Yes
Extend to 2018	Yes
Mandatory reporting	Yes
S 27	Yes
AQCS	Yes
Funding links	Yes
Other suggested amendments	<p>1 Where there are no objections to consent applications then consents should be granted without the need for a hearing. A case was presented to us in which there was no objection lodged to a consent application and yet it was necessary to proceed with a hearing at a probable cost of \$50,000. 2 Often smaller councils do not have in house expertise to process consent applications. The establishment of a national agency to process consent applications for larger projects would result in a streamlined processing system and also ensure national consistency/standardisation. 3 Rather than have an adversorial approach to consent applications councils should approach each application with a view to assisting the applicant to find a solution that is satisfactory/compliant. In the interests of economic balance and progress, approving authorities should seek to assist and smooth the way for applicants provided the projects/industry meets preordained criteria in terms of economic benefit to a region.</p>