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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 (section 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 provides a realistic opportunity for clean air wood burners to allow for 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 achieve the targeted results. Wood burner users must be educated on the correct purchase and/or collection and storage of wood fuel, use and type of fuel, correct operation of their wood burner, the "burn bright burn right" mentality and importance of regular servicing. All these factors must have due consideration in order to improve old and current wood burner emissions, and air shed air quality. • 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 serious health issue then central government health funding could be identified as a funding source. • 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.

	<ul style="list-style-type: none"> • Introduce “Good Wood Merchant” initiatives. Similar to those introduced in the Nelson and Tasman regions. • Recommend a strategy that removes the use of old style inefficient open brick fires (as per ECan and Nelson Air Plans), and phase out old wood burners (i.e. more than 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 and permitted activities, together with new industry consents.
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2. Costs and Benefits

<p>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.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>If no, how can the estimates be improved?</p>	
<p>Are there any costs and benefits we have overlooked?</p>	
<p>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.</p>	<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	<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 both national level (central government) and local government level (Local problem local solution scenario). This needs to be in the same vicinity as other major health related education campaigns, such as the anti smoking and road safety education programmes. As the impacts of PM10 is highlighted as a significant health issue then central govt health funding could be identified as a funding source. • 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 mindset that has become engrained in consumers 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 (older than 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 recognised dirty fire operators that unduly influence or bias the monitoring stations. These ultimately affect the majority of wood burner users in the region who 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.

