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In favor of 4a?	No
Reason/s	<p>We strongly disagree with requiring mandatory offsets for new industry consents in breaching airsheds after 2018. However, we agree with the other amendments. Requiring Mandatory Offsets for New Industry Consents in Breaching Airsheds. We strongly disagree with requiring mandatory offsets for new industry consents in breaching airsheds after 2018 for the following reasons: While industry has to play its part, and must be seen to do so, not to the degree that the requirements on it are inequitable (as is currently the case). This inequity will be continued with mandatory offsets in non-complying airsheds. While the option of offsets is a useful tool, they should not be mandatory but should be available as an option. An equitable offset approach may not be available in many instances. Consent authorities should have the option of imposing this approach for discretionary activities as a condition of consent. In some cases, this would probably be as an alternative to installing more sophisticated emission control devices, especially for an existing activity looking at expansion. A consent condition, including any review condition, requiring offset should then be subject to appeal to the Environment Court by a dissatisfied applicant. For permitted activities, controlled activities, and restricted discretionary activities, the offset option could be included in Plan rules as an option, and rules can then be used to regulate the emissions of fine particulate and other contaminants, including using review conditions. There is also the issue that at least some of the airsheds in New Zealand are geographically relatively large, and ambient air monitoring for compliance purposes is only carried out in a limited area, which represents the worst case situation. Frequently, in other areas of the airshed, urban and industrial/commercial development is limited and the concentration of fine particulate in air, at least from man made sources, is minimal and emissions to air in these locations has minimal, if any, effect on the polluted areas of the airsheds. The straight/ curved line path requirements should remain as airshed requirements but industry should be regulated through consents (and permitted activities, controlled activities and restricted discretionary activities via Plan rules) according to local circumstances, not by regulations such as regulations 17 to 19 inclusive, and particularly not by regulation 19. For example, if the situation warranted it, and application for a discretionary activity COULD be declined, not MUST be declined. We don't agree that maintaining the status quo is necessary for health protection, and to a large degree all it will do is maintain the existing inequity. In respect to the statement in the Ministry for the Environment's discussion document: "However, not allowing the granting of industry consents in breaching airsheds after 2013 will bring about a transfer of compliance costs to the industry sector"; this is an unreasonable comment. Overall, industry is a major wealth generating sector. It is also, directly or indirectly, the provider of many services to the community and the source of significant employment throughout the country. Industry should pay its fair share, but only its fair share. In respect to the comment in the Ministry for the Environment's discussion document that mandatory offset requirements may steer industry to adopt cleaner technologies from the start, even the cleanest emission control option emits more fine particulate than not establishing the new industry, or expanding the existing industry, in the first place. The Ministry for the Environment's discussion document comments that it is also anticipated that airshed compliance will be achieved with increased ministerial oversight in the years leading up to 2018, thereby minimising the effects of mandatory offsets on industry. However, there is no guarantee that increased ministerial oversight will minimise the effects of mandatory offsets on industry. Consequently, the only certainty for industry appears to be uncertainty. While we have no issue with increased ministerial oversight in respect to domestic and other non-industrial/commercial activities, such oversight in respect to industrial & commercial activities may not give the desired level of certainty.</p>
Any changes?	Yes
Suggested changes	<p>If Option 4a proceeds, then the following change is recommended in relation to "Exceptional Events". We recommend that marine salt aerosols should be specifically included when interpreting the term "Exceptional Events". While marine salt aerosols, like high wind events, are not an "exceptional event" as such, the natural occurrence in many areas of New Zealand of marine derived salt spray can be significant. Salt spray is not only at times significant in coastal areas, relatively high concentrations of salt spray can be found many kms inland from the coast. While high levels of salt spray are often associated with high wind events, this is not always the case. Rough sea conditions generated by offshore storms can generate high surf and only light wind conditions are required to transport salt spray inland. Consequently, salt spray particulate should not, in New Zealand, be included as PM10 for assessment purposes. Marine salt particulate is very water soluble, and when inhaled will quickly dissolve in the respiratory tract. We don't believe that salt aerosols are an issue to the public health in New Zealand. In any case, salt aerosols in the atmosphere cannot be prevented and outside of having to reduce the emission of other fine atmospheric particulates to compensate, nothing can be done.</p>

	Consequently, marine salt aerosols should be specifically included when interpreting the term "Exceptional Events".
In favor of 4b?	Yes
Reason/s	Option 4b appears to be the simplest approach. For discretionary activities, it will be up to the consenting authority to grant, or not grant, any applications for consent. And, if consent is granted, subject to conditions, any decisions are subject to the appeal provisions of the RMA. Whether or not the offset tool is used, and to what degree, then becomes a matter for the applicant and the consenting authority, with input from the public and other interested parties, by way of submission for notified applicants. We believe that the Plan rules can be amended to reflect the approach for discretionary activities to cater for permitted, controlled, and restricted discretionary activities, and we presume this can be done by regulation rather than through the burdensome approach of individual Plan changes. In summary, the best option from an industrial perspective is either Option 1 (the TAG's recommended approach) or Option 4b (the best compromise option proposed for discussion by the Ministry for the Environment).
Any changes?	Yes
Suggested changes	We recommend that marine salt aerosols should be specifically included when interpreting the term "Exceptional Events". While marine salt aerosols, like high wind events, are not an "exceptional event" as such, the natural occurrence in many areas of New Zealand of marine derived salt spray can be significant. Salt spray is not only at times significant in coastal areas, relatively high concentrations of salt spray can be found many kms inland from the coast. While high levels of salt spray are often associated with high wind events, this is not always the case. Rough sea conditions generated by offshore storms can generate high surf and only light wind conditions are required to transport salt spray inland. Consequently, salt spray particulate should not, in New Zealand, be included as PM10 for assessment purposes. Marine salt particulate is very water soluble, and when inhaled will quickly dissolve in the respiratory tract. We don't believe that salt aerosols are an issue to the public health in New Zealand. In any case, salt aerosols in the atmosphere cannot be prevented and outside of having to reduce the emission of other fine atmospheric particulates to compensate, nothing can be done. Consequently, marine salt aerosols should be specifically included when interpreting the term "Exceptional Events".
CB accurately reflected?	0
How can estimates be improved?	We are not qualified to comment.
Any overlooked costs?	We are not qualified to comment.
Information you'd like included	We are not qualified to comment.
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	0
Other suggested amendments	We recommend that marine salt aerosols should be specifically included when interpreting the term "Exceptional Events".