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In favor of 4a?	0
Reason/s	<p>Support the increase in exceedances as per international standards. Support the exclusion of exceptional events. The guidance regarding exceptional events needs to be unambiguous. If local events (such as the application of fertiliser, an idling truck, plasma cutting) are included, Councils may be inclined to exclude actual exceedances. I would like to see the exclusions relating to natural events and very specific anthropomorphic cases. Support the extension of timeframe.</p> <p>Oppose the imposition of mandatory offsets for new industry. At present, industries are subject to a rigorous, well-established resource consent process. Through this process, industry is required to adopt the best practicable option and commit to continued improvement. The existing process is adequate to allow a continued reduction in PM10 emissions from this sector and create a headspace for new (or expanded) industry. In addition, industries that hold air discharge consents already contribute to Councils' air quality related programmes through annual fees and charges. This is additional to the considerable cost associated with the air discharge consent process itself. Any further financial contribution by this sector can not be justified given its relatively minor use of the air resource. The imposition of offsets on industry in noncomplying airsheds may encourage industry to locate within complying areas; therefore, rewarding Councils that have worked hard to achieve compliance. However, this may disadvantage industry and penalise a sector that is not responsible for the majority of emissions. The responsibility to reduce emissions should be equitably distributed amongst the sectors. It is our position that industry already bears its share. Mandatory reporting of PM10 We understand that this will require the establishment of additional monitoring sites throughout the nation. Any new monitoring sites should be for PM2.5 rather than investment in technology that is becoming redundant. In this way, New Zealand's monitoring network will be future proofed. Support the use of existing ministerial powers. However, we do have concerns regarding adequate resourcing at MfE to achieve effective ministerial oversight. Support the establishment of a national air quality compliance strategy. We consider it more efficient to have one national strategy than each regional council paying for the preparation of a regional air quality implementation plan.</p> <p>Proposed changes to option 4a Should mandatory offsets be included in the NES, we suggest that significant sources are identified (by MfE to avoid the confusion that occurred when the NES was first promulgated) and that offsets are always applied to those sources in noncomplying airsheds. Furthermore, we suggest that the noncomplying airsheds also be identified. This would provide certainty for industry and avoid the possibility that consents are granted without offsets in the first part of the year when an airshed is complying and then, offsets are applied for the rest of the year when three exceedances have been recorded.</p>
Any changes?	0
Suggested changes	
In favor of 4b?	0
Reason/s	I agree that industry consent restrictions should be removed. As stated above, industry emissions can be managed through the RMA and Regional plans.
Any changes?	0
Suggested changes	
CB accurately reflected?	0
How can estimates be improved?	
Any overlooked costs?	
Information you'd like included	
Increase from 1 to 3	Yes
Exclude exc events	Yes
Mandatory offsets	0
No industry restrictions	Yes

Extend to 2018	Yes
Mandatory reporting	0
S 27	Yes
AQCS	Yes
Funding links	0
Other suggested amendments	As previously mentioned, responsibility should be placed on each sector equitably. The proposed amendments include a carrot and a stick. Methods to encourage regional authorities to address home heating emissions within their regions. However, there are no comparable incentives for the government to take action in transport sector. All TAG recommendations have been referred to the Ministry of Transport. A means of requiring MoT to implement a national transport emissions strategy should be included.