

Submission on Proposed Amendments to the National Standards for Air Quality

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Organisation: This submission is made as an individual

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Problem Definition: (Section 3, Page 14)

This section refers to the 2007 HAPINZ Study in which it is "estimated that around 1100 New Zealanders die prematurely each year due to air pollution from home heating, transport and industry". The Minister for the Environment's Review of the PM₁₀ Air Quality Standards quotes from the same source and states (Para 5, Page 1, that "each year around 1100 New Zealanders die prematurely from air pollution" and later (Para 2, Page 10) "the primary pollutant causing adverse health effects is particulate matter less than 10 microns in diameter (PM₁₀)".

These statements imply a cause and effects relationship between increased mortality and air pollution. That is the problem. The scientific evidence does not warrant such a dogmatic position as has been pointed out repeatedly by AIR over the last decade.

Air pollution may be associated with adverse health effects including mortality but so are many other factors such as age, climate, smoking, socio-economic status and so on. As the HAPINZ Report says (Page S₅) – "Any assessment of the health effects of air pollution is extraordinarily complex. For a start, the level of air pollution is highly variable in space and time and is affected by the weather, by what is being emitted through various activities, and by very location-specific features such as valleys and where people live and work in relation to the sources." The Report refers to 'association' eg in Table E-2 (Page S₇) in which it is stated that "air pollution is associated with 1079 cases of premature mortality – that is people dying earlier than they would if they had not been exposed to air pollution." And later (Page S₇) – "this result should not be interpreted too dramatically some of these people may be dying a matter of days or weeks earlier than they would have otherwise. But it also means they may be dying months or years earlier."

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The principal reason for the current Standards and particularly for their stringency, is the presumption that air pollution causes large numbers of deaths in New Zealand. This remains highly controversial and an independent scientific review of Reports such as the HAPINZ Study is long overdue.

I believe the Standards should be relaxed and amended according to the recommendations of the Technical Advisory Group (Option 1). The TAG also recommended new Standards for PM_{2.5} as well as an annual standard for PM₁₀ but the Minister has deferred consideration of any additional standards until 2011. This is regrettable and will prove costly. In my submission on New Ambient Air Quality Guidelines in 2001, I recommended that an annual guideline for PM₁₀ be retained.

The Minister should implement the TAG Report.

A handwritten signature in black ink, appearing to read 'D R Hay', with a long horizontal stroke extending to the left.

D R Hay
5 July 2010

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