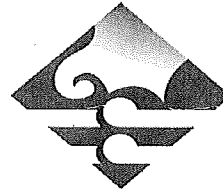


Regional Public Health
Better Health For The Greater Wellington Region



09 July 2010

Ministry for the Environment
PO Box 10362
Wellington 6143

Dear Sir/Madam

Proposed Amendments to the National Environmental Standards for Air Quality

Thank you for the opportunity to provide a written submission on the Proposed Amendments to the National Environmental Standard (NES) for Air Quality.

Regional Public Health (RPH) considers the NES for Air Quality to be important for minimising adverse public health effects from particulate emissions.

RPH is a regional service located within the Hutt Valley District Health Board (DHB). Our geographical area of service delivery spans Hutt Valley DHB, Capital & Coast DHB and Wairarapa DHB. We are the third largest public health service in New Zealand in terms of population and geographic coverage. We deliver a range of population and personal health services, aiming to improve the health of communities throughout the greater Wellington region.

We are happy to provide further advice or clarification on any of the points raised in our submission. The contact point is:

Chris Edmonds
Health Protection Officer
Regional Public Health
Private Bag 31 – 907
Lower Hutt
Telephone: 570 9134
Email: chris.edmonds@huttvalleydhb.org.nz

Yours sincerely

Dr Stephen Palmer
Medical Officer of Health
Regional Public Health

Peter Gush
Service Manager
Regional Public Health

Introduction

RPH made a submission in August 2009 on the Review of National Environmental Standards for Air Quality. In that submission we gave advice on increasing the number of exceedences per year, increasing the target timeline beyond 2013 and addressing inequitable aspects of compliance. We are pleased to see that the preferred options address these issues to enable continued sustainable economic development while still protecting public health.

Problem Definition

1. Have the main problems been defined accurately?

Yes. We consider that the main problems have been defined accurately.

2. Are there other problems you can think of that need to be addressed as a priority?

No. We consider that the significant problems that needed to be addressed as a priority have been addressed.

3. Do you agree with the policy objectives?

Yes. The policy objectives cover the main issues associated with controlling PM₁₀ emissions.

4. Do air quality standards materially influence industry investment decisions and regional location decisions?

Yes. The National Environmental Standards for Air Quality would affect industry decisions and regional location decisions. For example, the potential for industries to be denied resource consent approvals in a specific airshed due to PM₁₀ exceedences, would definitely affect long term investment decision making and location decisions.

What are the options?

5. Have the options achieved the policy objectives?

Yes. We consider that the preferred options achieve the policy objectives. By retaining a timeline for compliance by 2018 there is still a baseline to support the protection of public health. The other two policy objectives i.e. greater certainty for industry and local authorities in planning and decision making can also be achieved by the preferred options e.g. the establishment of an air quality compliance strategy.

6. Have the options addressed the identified problems?

Yes. The preferred options have addressed the identified problems e.g.:

- Permitted exceedences have increased from 1 to 3 per year.
- The timeline has been extended to 2018 to enable better compliance.
- Relaxing of the restrictions on industries in non-complying airsheds to help reduce inequitable aspects of compliance with the Air Quality Standards.

7. Which preferred option do you think should be considered?

We recommend that Option 4a be considered as the preferred option as we support including the option of mandatory offsets for new industry consents after 2018 in airsheds breaching particulate limits.

8. Are you aware of any other costs or benefits of the options?

No. We are unaware of any other significant costs or benefits that have not been included in the discussion document.

9. What current opportunities do you know of that could help reduce your emissions (e.g. updating current equipment)? Do you see these opportunities as effective in reducing total emissions within an airshed? What are the costs of these alternative opportunities? What is stopping these opportunities from being introduced now?

Not applicable to RPH.

10. What costs do stakeholders face when complying with resource consent restrictions required by air quality standards?

No comment.

11. Is it practical to require mandatory offsets in over-allocated airsheds?

Yes. We consider it practical to require mandatory offsets in over-allocated airsheds. This will help to protect an airshed from excessive particulate emissions but still allow industries to establish themselves in non-complying airsheds provided that they take steps to minimise particulate emissions.

12. What is the scale of the economic impact of mandatory offsets on industry? We are particularly interested in:

- *The materiality of these impacts on your business (e.g. what proportion of your total operating costs will these comprise and will it materially impact on your profitability)?*
- *Will these costs impact on current or future investment decisions you are likely to make*
- *Any other impacts you see arising from a requirement to offset emissions?*

Not applicable to RPH.

13. Will mandatory offsets for new industries in breaching airsheds encourage industries to adopt cleaner technologies?

We consider it will encourage industries if the costs of offsets exceed the cost of adopting cleaner technologies to minimise PM₁₀ emissions.

14. What costs will councils incur to comply with the proposed mandatory reporting PM10 monitoring data?

Not applicable to RPH.

15. How effective are rules at the national level in addressing air quality issues (e.g. managing emissions from various sources) compared with providing regional flexibility?

We consider that rules at the national level establish a consistent base level for all airsheds in New Zealand. The proposed options also allow a degree of regional flexibility in terms of meeting the 2018 timeline and granting resource consents for particulate discharges after 2018.

Costs and benefits

16. Have we accurately reflected the range of costs and benefits arising from the proposals for a national environmental standard, and who might bear the costs or receive the benefits?

The cost benefit analysis appears to be comprehensive.

17. Are there any costs and benefits we have overlooked?

We cannot identify any significant costs or benefits that may have been overlooked in the analysis.

18. Do you have 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?

No comment.