

7 July 2010

Ministry for the Environment
PO Box 10362
WELLINGTON 6020

Dear Rapunzel

AIR QUALITY STANDARDS REVIEW SUBMISSION

The Tasman District Council is pleased to make a submission on the proposed changes to the National Environmental Standards (Air Quality).

The Tasman District Council makes the following submissions;

1. NUMBER OF EXCEEDANCES

A change to three exceedances is proposed to ensure consistency with international standards and also in response to other submitters. The proposed change reduces the regulatory pressure to meet the air quality standard slightly.

There is also an obvious logic to excluding exceptional events as Council would have no means of managing such events anyway.

(i) That Tasman District Council supports the change to the number of exceedances from one to three and

(ii) That Tasman District Council supports excluding exceptional events.

2. REMOVAL OF RESTRICTIONS ON RESOURCE CONSENTS

The Council has previously supported the removal of this restriction. Richmond has minimal industry (which includes schools and hospitals) and restrictions on industry sources of PM₁₀ are considered inequitable when the main cause of the problem is solid fuel burners.

(iii) That Tasman District Council supports the proposed removal of restrictions on resource consents.

3. MANDATORY REPORTING

The Council already reports air quality monitoring data in real time. It also reports exceedances of the standards by public notices as already required by the NES. The proposed amendments will have very little impact on current practice.

4. MINISTERIAL POWERS and COMPLIANCE STRATEGY

The Minister will exercise powers and proposes under section 27 to require information to be supplied by councils to show how NES provisions are being met.

The Minister also intends to prepare an air quality compliance strategy by 2013 to outline the complete suite of options the Minister may take when councils fail to take action to address non-compliance and air sheds continue to breach the standard.

The Council has already adopted air quality management provisions and is achieving some success.

5. MANDATORY OFFSETS

Any new PM₁₀ discharger into a breaching air shed would be required to somehow offset the proposed new emissions. For example, by upgrading open fires or non-compliant wood burners. The objective is "to do no more harm". An offset would stop pollution getting any worse. It is not required to improve air quality.

The alternative proposal is for no off-sets to be required and the consent to be considered on its merits, including effects on PM₁₀.

(iv) That Tasman District Council supports the need for mandatory offsets for any new discharge of PM₁₀ into a breaching airshed after 2018.

6. TARGET FOR COMPLIANCE

The proposal suggests a new target of 2018 for compliance with the air quality standards. There is plenty of evidence showing the links between poor air quality and adverse effects on health. The costs of pushing the time for compliance out to 2018 are in terms of adverse effects on people's health, especially the very young and old and people with already poor respiratory or cardio-vascular health.

However, while the benefits of good air quality are obvious, the costs of replacing old model wood burners and open fires falls unevenly across the Richmond population. There is a variable ability of people to pay for upgrades to their home heating system. An air quality plan that allows people time to plan for upgrades, and also provides subsidies and incentives to both encourage and enable people to upgrade is likely to have less financial impact on individuals and less compliance costs associated with it than one that relies more on regulation.

The longer timeframe proposed allows the Council and its community to take into account natural attrition and the on-going, although diminishing, effects of its house sales rule.

- (v) That Tasman District Council support the change to the target date of 2018 for compliance with the air quality standards.**

7. INCENTIVES

One of the biggest barriers to change is cost of upgrades. The Council has previously indicated concerns about using ratepayer funds to provide subsidies for households, but is very supportive of government initiatives (such as the substantial clean heat subsidy currently available) to address the social impacts implicit in the costs of upgrading home heating systems.

The Council has just adopted a further financial assistance programme, Warm Tasman, to help ratepayers' access to government subsidies by supplying the balance money through a targeted voluntary rate.

Because one of the biggest barriers to improving air quality is cost, the Council suggests that the government targets money available through the Clean Heat, Warm Homes programme more specifically to breaching air sheds. This enables two health issues to be dealt with at once, namely cold poorly insulated homes causing poor health and poor air quality also causing adverse health effects. A targeted approach to funding may also see a greater subsidy made available for replacement of wood burners and open fires (the current subsidy is \$500) in breaching airsheds.

- (vi) That Tasman District Council submits that government funding for Clean Heat Warm Homes projects are targeted for breaching air sheds and that additional funding be made available for replacement of non-compliant solid fuel burners.**

8. EDUCATION INITIATIVES

The technical advisory group considering the review recommended greater focus on education by the Ministry. It has not been adopted as the Ministry has no funding allocated for this and it was felt the government is not likely to fund greater effort in this area.

The Council notes that further education and advocacy effort will be required to continue influencing people's decisions to upgrade home heating. This education effort would be reinforced and given weight if there was central government support. It also provides another avenue for people to hear the messages about air quality and improves chances of success.

- (vii) That the Government adopt targeted education and advocacy programmes to reinforce messages about air quality and the need for more sustainable decisions about home heating in breaching airsheds.**

The Council is happy to provide more information or discuss its submission further if necessary.

Yours sincerely

A handwritten signature in cursive script that reads "Dennis Bush-King".

Dennis Bush-King
Environment & Planning Manager