

1 July 2010

Chief Executive  
Ministry for the Environment  
PO Box 10-362  
WELLINGTON 6143

Dear Dr Reynolds

### **SUBMISSION ON REVIEW OF NATIONAL ENVIRONMENTAL STANDARDS FOR AIR QUALITY**

Thank you for the opportunity to provide comment on the discussion document Proposed Amendments to the National Environmental Standards for Air Quality, June 2010. This submission was considered and approved by the Council.

#### **Option 4a**

##### **The Council supports:**

- Increasing the number of exceedances to 3
- Excluding exceptional events from counting as exceedances
- Requiring mandatory offsets for new industry within breaching airsheds after target date
- Establishing an air quality compliance strategy

##### **The Council supports in part:**

- Use of Ministerial powers under the Resource Management Act (s27) but believes the package should also include s24A (Power of Minister for the Environment to investigate & make recommendations), s25 (residual powers to appoint commissioners), s25A (direct preparation or change to a plan) and s25B (direct to review plan).

##### **The Council opposes:**

- Extending the timeline for compliance to 2018. The Council and its residents have invested heavily, both in effort and money, in complying with the current 2013 timeline, and are on track to meet it. Shifting the timeline sends the wrong signals and disempowers and undermines the efforts of councils and householders who have complied.
- Option 4b – removing all industry consent restrictions. New discharges ought not be added to a polluted airshed unless 'offsets' are used to ensure no harm if done.

## **Cost Benefit Study**

The Costs and Benefits chapter of the discussion document obscures the net costs associated with extending the timeline to 2018. It gives no information on the estimated additional deaths and health impacts that would arise (other than in dollars). A reader has to work hard to understand that shifting from 2013 to 2018 will lose over \$0.5 billion in net potential benefits.

Thank you for the opportunity to provide comment. If there are any matters that require clarification, please contact David Jackson, Senior Policy Planner, ph 03 546 0432.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Keith Marshall', written in a cursive style.

Keith Marshall  
**Chief Executive**