

31 March 2015

Proposed Canterbury Air Regional Plan
Environment Canterbury
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Christchurch 8140

Email: mailroom@ecan.govt.nz

Dear Sirs

Proposed Canterbury Air Regional Plan

Thank you for the opportunity to comment on the above document.

The New Zealand Manufacturers and Exporters Association (NZMEA) represent the interests of manufacturers and exporters throughout New Zealand.

The Association is New Zealand's only focused and independent voice for manufacturers and exporters. Members make over \$6 billion in sales per year, with an export value of around \$3 billion. The Association can trace its beginning back to the early history of New Zealand.

The Association also includes in its membership affiliate organisations such as the Wood Processors Association, the Engineering Printing & Manufacturing Union Inc, the Heavy Engineering Research Association (HERA), and Plastics New Zealand.

The NZMEA is an independent association of manufacturers and exporters. We do not seek or receive funding from local or central government; we have affiliate organisations, we do not affiliate to any other organisation.

The NZMEA's comments further support our earlier submission on the Air Plan Review of July 2014.

The NZMEA also supports the points raised in the submission presented by the Canterbury Development Corporation.

Observations

Industry is vital to the wellbeing of the region and city. The issue of air quality impacts everyone, and we agree that reductions in PM10 should be an objective for everyone. Air quality involves odour and particulate content that breaks into dust and combustion products. The interaction of components of the community lead to issues that add noise to the mix of odour and particulate content - this interaction is negatively impacted by poor management of the planning, consent and enforcement regime.

Specific Comment:

1. Introduction - the statutory planning framework (offsets)

Offsets are important, industry is, where currently feasible, reducing outputs of dust and combustion products. That said, there is much more capacity, based on the level of emissions, for the domestic heating sector to reduce overall PM10 emissions. The effort, in the short term at least, should go where there is most to gain – domestic heating and associated wood-burner appliances. It would be sensible for ECAN to coordinate an across the board offset programme that should not be restricted to offsets trading within a sector but be airshed wide.

3. How the Plan Works

Our members are of the view that each sector has a role to play. Domestic emissions have to be reduced and offsets made available to industry. Industry is important to the community; we all have to make a living. Industry can, and will, play a role; that said, the drive to “best practice” can be impossibly expensive and that might be better expressed as “common or normal” practice to protect local activity that must compete with easier options elsewhere.

Considerations should also be made to allow industry the required time to meet changing requirements, and the necessity of maintaining throughput as upgrades are implemented. Long periods of closure threaten the continued existence of industrial operation as customers depend on continuous supply. This requires allowing realistic timelines when requiring upgrades from industry to ensure air quality targets are met over time without damaging business operation.

Future management of emissions should be based on more realistic assessments as noted above. Binary threshold assessments are not that good at examining trends over time. Given ongoing improvements are indicated by the average level assessments; the airshed will be unloaded at some point without the wholesale elimination of industrial activity. In terms of remedial activity, it is important to understand the contribution made by dust and combustion products.

6. Policies - Central Policies Applying to All Activities: 6.5 - 6.8

Environment Canterbury and the Christchurch City Council should seek alignment around the standards of enforcement for transient conditions of dust, noise and odour, these standards should take into account the City Plan zoning where the problem exists. What might be acceptable in an industrial zone may not be acceptable in terms of dust, noise and odour in a residential zone – enforcement procedures are important in this regard.

Changes should be notified, particularly when there might be a risk of reverse sensitivity associated with any proposed change.

Consents should carry a degree of honesty, as it is unrealistic to anticipate that noise, dust and odour; integral to any given operation, will be constrained to the boundary at all times. Mistakes happen, problems arise and we need to be realistic in our response and expectations.

The careful use of graded zones: B4 surrounding B5 areas for example, holding the line on the City Plan to limit encroachment of inappropriate (more sensitive) activities in B4 and B5 zones, and using geographic features (rivers and roads) as zone boundaries all have a role to play in separating conflicting activities.

The best example would be in an industrial context if a cement factory was operating and an auto finishing operation was to locate nearby the problem rests with the late arrival equally if the auto finisher was operating and the cement factory moved in the cement factory has the problem – as you say last in first out.

More broadly we need to stop zone encroachment if heavy industrial do not allow sensitive activities in the zone or make it clear that last in first out applies. Without this protection assets might be stranded and new investment strangled for fear of new complaints arising from sensitive newcomers.

Schedule 2: Schedule for assessing offensive or objectionable dust.

We see the common themes associated with dust, noise and odour. As far as possible the associated issues around approval, measurement and nuisance assessment should be consolidated and applied consistently by the planning, consenting and enforcement efforts at ECan and the CCC. Objective measurement, separation of combustion products and other dust, graduated (by zone) response and enforcement all have a role to play.

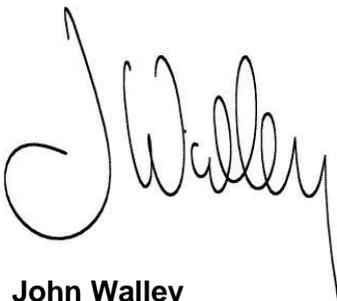
The assessment of dust, noise and odour is less than objective. Conditions after the earthquakes have distorted the PM10 levels, and dust should be segregated from the combustion product assessment. Furthermore, compliance or otherwise to the 50ug/m3 threshold should, in transient terms at least, be replaced by an assessment of what is happening to actual mean trends of PM10 dust and combustion products.

Schedule 8 - Space Heating Appliance Auditing Process

Industry has its part to play, as do the regulators, other sectors and residents. Effective reductions in the domestic emissions of combustion related PM10 are critical; assisted by changes in the type of domestic heat sources and compliant woodburners in use. Having compliant and efficient products available in the market is very important to ensure domestic residents can make the transition towards more efficient heating and lower emissions. ECan as the regulator has a vital role in ensuring the standards and methods of testing are available to get the right products into the market quickly.

We are happy to supply further information or speak to this submission as required.

Yours sincerely

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

**John Walley
Chief Executive**

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