

File No: ENV/06/08/01
23 July 2009

Phil Barry
Chair, Technical Advisory Group
C/- Ministry for the Environment
PO Box 10-362
Wellington 6143

PO Box 11646
Wellington 6142
142 Wakefield St
New Zealand
T 04 384 5708
F 04 385 6960
www.gw.govt.nz

Dear Phil

Greater Wellington submission on ministerial review of PM₁₀ regulations in the air quality standards

Thank you for allowing us the opportunity to provide input on technical matters relating to the review of the air quality standards. Our comments on the three areas subject to review are as follows:

The number of permitted exceedences

Greater Wellington supports the number of permitted exceedences for PM₁₀. There do not appear to be special circumstances in New Zealand that justify increasing the number of permitted exceedences. If natural events (e.g., dust or sea salt) are leading to exceedences then the measurement metric needs to be changed (e.g., from PM₁₀ to PM_{2.5}) or exceedences that can be demonstrated as due to natural causes should be permitted. Amending the regulations to state that the 12 month period is a calendar year would provide clarity for reporting and compliance purposes.

The target timeline of 2013

Greater Wellington supports the target of 2013 for meeting the PM₁₀ air quality standard. The current air quality standard for PM₁₀ provides a minimum level of health protection for all New Zealanders. No safe level of exposure for PM₁₀ has been reliably demonstrated and therefore it is not appropriate to relax the target of 2013.

Whether or not the standard is achievable by 2013 is a separate issue and is determined by available resources and community aspirations. We do not support penalties for not meeting the standard by 2013 falling on industry through resource consent constraints. Indeed, we do not support financial or other penalties for failing to meet the standard. A more effective approach could be to work collaboratively with local and central government to devise action plans for non-complying airsheds. Additional funding from central government may be necessary to accelerate compliance in heavily polluted airsheds.

The air quality standards may inappropriately penalise industry because domestic heating, not industry, is the primary source of this pollution.

Greater Wellington agrees that industry in our region could be unfairly penalised as domestic heating is the principal contributor to PM₁₀ exceedences.

Decision we wish the Minister for the Environment to make

Retain the one permitted annual exceedence of the PM₁₀ threshold concentration. Retain the 2013 timeline for compliance with the standard and repeal sections 17 to 19 of the regulation that relate to resource consents.

Yours sincerely

David Benham
Chief Executive

Address for service:

Nigel Corry
Manager, Environment Division
Greater Wellington
PO Box 11646
Wellington 6142