

10. AIR QUALITY

GENERAL SUBMISSIONS ON AIR QUALITY

Decision Requested: 10.1

Submitter	12	CAYGJ
Support	19	ELWEP

Submission

Air quality in West Coast urban areas other than just Reefton is significantly compromised by burning coal for domestic heating in winter. It is known from previous monitoring that Greymouth air quality sometimes falls below NESAQ limits, with likely adverse health effects and the considerable nuisance factor of the smell and grime of dense low-hanging coal smoke. Despite this, "*The Regional Air Quality Plan does not have provision to deal with individual discharges of smoke from domestic fires, except for in the Reefton Airshed.*" (p.35) The RPS goes on to say that "*It is uncertain if or what action may be needed or feasible in other urban places to meet the NESAQ for PM10 once compliance is achieved in Reefton.*" (p.36) This dilatory attitude to a significant air pollution issue is unacceptable. Winter air quality should be monitored regularly in Greymouth as well as Reefton, and in any other urban areas on the West Coast prone to air pollution.

Further submission (ELWEP)

I support this submission. My reasons are aligned with those of the submitter.

Recommendation

Reject

Reason

Council agrees that good wintertime air quality is important, however due to Council's limited resources it is inappropriate to commit in the Proposed RPS to undertake air quality monitoring or investigations in other urban areas in the next 10-15 years, when it is unclear how long it will take to reduce smoke emissions in the Reefton Airshed. Council only has one air quality monitoring machine. The Government has not identified any other West Coast towns as being an Airshed, so this is why Reefton is the priority at present. The Government is intending to change the National Environmental Standard for Air Quality (NESAQ), and it is unclear at this stage what these changes will mean for management of Reefton, and other West Coast towns', air quality.

Decision Requested: 10.2

Submitter	14	CPHWC
Support	28	INTAF
Support	33	KMTC

Submission

Good air quality is essential to health and wellbeing. Although the West Coast may enjoy a generally high standard of air quality, many areas (including some outside the Reefton air-shed) are prone to reduced air quality in winter. The burning of fossil fuels has adverse effects on air-quality and also contributes to green-house gas emissions and climate change. All of these have and will continue to have negative impact on health, and the social and economic wellbeing of the West Coast.

Further submission (INTAF & KMTC)

Support

Recommendation

Reject

Reason

Council agrees that good Wintertime air quality is important, however the Government has not required regional councils to ban the use of coal on domestic fires. The Government is intending to change the National Environmental Standard for Air Quality (NESAQ), and it is unclear at this stage what these changes will mean for air quality management in West Coast urban areas and the Reefton Airshed.

Decision Requested: 10.3

Submitter	14	CPHWC
Support	28	INTAF
Support	33	KMTC

Submission

Without adequate monitoring it is difficult to get an overall picture of the level of PM10 and other pollutants in our air.

Further submission (INTAF & KMTC)

Support

Recommendation

Reject

Reason

Due to Council's limited resources it is inappropriate to commit in the Proposed RPS to undertake air quality monitoring or investigations in other urban areas in the next 10-15 years, when it is unclear how long it will take to reduce smoke emissions in the Reefton Airshed. Council only has one air quality monitoring machine. The Government has not identified any other West Coast towns as being an Airshed, so this is why Reefton is the priority at present. The Government is intending to change the National Environmental Standard for Air Quality (NESAQ), and it is unclear at this stage what these changes will mean for management of Reefton, and other West Coast towns', air quality.

Decision Requested: 10.4

Submitter	14	CPHWC
Support	28	INTAF
Support	33	KMTC

Submission

It is disappointing to note that when balancing the needs of people Council is prepared to accept ongoing health issues as a result of seasonal reductions in air quality, especially when these health effects in turn affect social and economic wellbeing which is a central focus of the draft RPS.

Further submission (INTAF & KMTC)

Support

Recommendation

Reject

Reason

The submitter has not suggested any constructive alternative provisions for this chapter. Other health issues such as hypothermia may arise if there is a blanket ban on burning coal on domestic fires, and low income households cannot afford to heat their homes solely by electricity or burning wood. It is pointless progressing with air quality management in Reefton until the changes to the NESAQ have come into effect, as we do not know what the implications of the changes will be.

Decision Requested: 10.5

Submitter	28, 33	INTAF, KMCT
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Submission

There is no mention of the drift of agrichemicals in the PRPS in relation to air quality. This is an issue that needs addressing as farmers, especially with the increase in dairy farming, are opening up areas nearer residential places and areas of sensitive indigenous fauna.

Recommendation

Reject

Reason

Spray drift from agrichemical use is considered to not be a significant resource management issue on the West Coast, compared to regions such as Nelson-Tasman, and Hawkes Bay, to warrant adding provisions for it in the Proposed RPS. Council recognises it is a potential issue, and the Regional Land and Water Plan has rules to manage spray drift.

Decision Requested: 10.6

Submitter	34	KREMA
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Submission

Not only from winter heating it is an issue, also in the Glacier Valley with the helicopters and the noise from it. In front of the state highway the air is full of fumes from the helicopters. Also noise in rural areas is above the 55 decibels. Here, when the helicopters take off is about 74-88 decibels. Less use of helicopters everywhere. Noise distracts a lot from a good experience.

Recommendation

Reject

Reason

Noise and fumes from helicopter operation is considered to not be a significant resource management issue on the West Coast, to warrant adding provisions for it in the Proposed RPS. These effects of helicopter use are dealt with by policies and rules in the District Plans, and none of the District Councils have raised this as a significant resource management issue in the Region.

Decision Requested: 10.7

Submitter

37

MAITG

Submission

I do believe it is the inalienable right of all human beings to have access to shelter fire and water at an affordable price. I do not want to see West Coasters forced to become subscribers to ever increasing power charges suffering the same fate as our Canterbury neighbours. Commercial emitters should still remain within the National legal limits.

Recommendation

Reject

Reason

It is unclear whether this submission point supports or opposes the Proposed RPS Air Quality chapter, and the submitter has not sought any changes to it. Commercial discharges to air must comply with any relevant requirements of the National Environmental Standard for Air Quality, and relevant provisions of the Regional Air Quality Plan.

Decision Requested: 10.8

Submitter

70

WMP

Support

28

INTAF

Support

33

KMTC

Submission

Support – Westland Milk Products has implemented at the Hokitika factory site efficient measures to ensure low CO² emissions from its boiler stack and filters for the powder driers. This will minimise adverse effects. Being a big part of the Hokitika community Westland does not contribute CO² emissions therefore not compromising the health of the Hokitika community.

Further submission (INTAF & KMTC)

Support - especially for its efforts with respect to air quality.

Recommendation

Accept

Reason

The support is acknowledged.

BACKGROUND TO THE ISSUES

Decision Requested: 10.9

Submitter

28, 33

INTAF, KMCT

Oppose

54

STRAT

Submission

Amend the Background to the Issues: "...*Burning coal and wood for domestic heating in Winter affects air quality in some most, if not all, urban areas on the West Coast. The main contaminants affecting Wintertime air quality are particulate matter or PM10, which are the particles smaller than 10 micrometres in diameter, and the products of coal combustion, that can adversely affect human health.A balance needs to be achieved between fulfilling Council's obligations under the NESAQ to meet PM10 standards, the adverse health effects of the products in coalsmoke, and ensuring that people are able to keep warm in their homes during cold winter months.*"

Further submission (STRAT)

Smoke, generally, can cause adverse health effects if unmanaged. The issue is not restricted to coal smoke. For example, burning wet wood will have a far greater effect on air quality than burning coal.

Recommendation

Reject

Reason

The suggested changes do not add value to the Background section. Some smaller, coastal urban areas may not have Wintertime smog problems due to the small number of household fires discharging emissions, and the coastal wind. Fulfilling Council’s obligations under the National Environmental Standard for Air Quality (NESAQ) to meet PM10 standards, and managing the adverse health effects of the products in coal smoke are generally the same thing.

Decision Requested: 10.10

Submitter	63	WCCB
Support	28	INTAF
Support	33	KMTC

Submission

There is clear international evidence linking air quality to human health. In particular it is internationally agreed that PM10 emissions do affect human health and there is increasing evidence linking PM5 emissions also. It is incorrect to state, “can potentially” when it is know that these emissions are detrimental to human health. There is some confusion between terminologies, in the Summary it is stated “can potentially” [Issue 1] and in Section 10 it is stated “can adversely” affect human health.

Further submission (INTAF & KMTC)
Support

Recommendation

Reject

Reason

Council does not dispute the evidence linking poor air quality to human health. However, not everyone’s health is affected in the same way or to the same extent. The research indicates that children, elderly people, and those with respiratory conditions are more susceptible to being affected by air pollution. The confusion over terminologies is unclear, Issue 1 in the Proposed RPS Summary and Chapter 10 are both worded the same.

ISSUES**Decision Requested: 10.11**

Submitter	46	NZP&M
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Submission

Support – The regionally significant resource management issues for the West Coast are substantively identified.

Relief sought:

Retain without amendment.

Recommendation

Accept

Reason

The support is acknowledged.

OBJECTIVE 1**Decision Requested: 10.12**

Submitter	44	NZCC
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Submission

Support Objective 1.

Relief sought:

Nil

Recommendation

Accept

Reason

The support is acknowledged.

OBJECTIVE 2

Decision Requested: 10.13

Submitter

4

BALL

Submission

Ballance supports (with amendments) Objective 2 to Section 10: *Air Quality* of the proposed RPS. Ballance generally supports the outcomes sought by Objective 2 insofar as the Objective seeks to provide for discharges to air associated with activities that contribute to social and economic wellbeing, subject to the management of effects on air quality. In this respect, the application of fertiliser to land can constitute a discharge to air but is associated with improvements to the productivity of land and, in turn, generates positive economic effects and associated social benefits.

Ballance, however, considers that the term 'other values' within Objective 2 creates uncertainty as it is unclear what these 'other values' are. Such subjectivity is not useful to those seeking to interpret and apply the proposed RPS, and does not represent good resource management and planning practice.

Relief sought:

Ballance seek that Objective 2 to Section 10: *Air Quality* of the proposed RPS, be adopted with the following amendments: "*To allow discharges to air which are part of activities contributing to the social, economic, and cultural wellbeing of people and communities on the West Coast, while managing adverse effects of those discharges on air quality and other values.*"

Any similar amendments with like effect and any consequential amendments that stem from the amendments above.

Recommendation

Accept in part

Reason

We agree that the wording "*and other values*" is not best practice in an objective. The intent is that all relevant adverse effects will be managed, and these will depend on the location, nature, scale, and circumstances of each discharge. Objective 1 can be improved by removing the last statement referring to particular effects. The amended Objective will still achieve the purpose of the RMA.

Revised Text***Objectives***

2. To allow discharges to air which are part of activities contributing to the social, economic, and cultural wellbeing of people and communities on the West Coast, while managing adverse effects of those discharges, ~~on air quality and other values.~~"

Decision Requested: 10.14

Submitter

44

NZCC

Submission

Support Objective 2.

Relief sought:

Nil

Recommendation

Accept

Reason

The support is acknowledged. A minor amendment is recommended in response to Decision Requested 10.13, see the Revised Text above.

POLICY 1

Decision Requested: 10.15

Submitter

44

NZCC

Submission

Support Policy 1.

Relief sought:

Nil

Recommendation

Accept

Reason

The support is acknowledged.

POLICY 2

Decision Requested: 10.16

Submitter

4

BALL

Submission

Ballance supports (with amendments) Policy 2 to Section 10: *Air Quality* of the proposed RPS. Ballance supports the direction provided within the Policy in relation to reverse sensitivity considerations under clause 'a'. Ballance, however, considers that the Policy should be clarified by referring to activities that discharge contaminants to air (such as rural production land and manufacturing activities).

Ballance also supports the direction provided within Policy 2 in relation to 'codes of practice' and 'industry standards' under clause 'b'. In this respect the storage, use and handling of fertiliser is subject to, and effectively managed by, the following Group Standards under the Hazardous Substances and New Organisms Act 1996 and FertResearch's Code of Practice for Nutrient Management 2007:

- Fertiliser (Corrosive) Group Standard HSR002569;
- Fertiliser (Oxidising) Group Standard HSR002570;
- Fertiliser (Subsidiary Hazard) Group Standard HSR002571; and
- Fertiliser (Toxic) Group Standard HSR002572.

Relief sought:

Ballance seek that Policy 2 to Section 10: *Air Quality* of the proposed RPS, be adopted with the following amendments:

- "Management of adverse effects of the discharge of contaminants to air shall include consideration of the following:*
- a) *Reverse sensitivity, including the siting of inappropriate development in proximity to activities that discharge contaminants to air;*
 - b) *Use of technology, codes of practice, and industry standards; and*
 - c) *Best practicable option."*

Any similar amendments with like effect, and any consequential amendments that stem from the amendments above.

Recommendation

Accept in part

Reason

The support is acknowledged.

Clause a) is unclear in terms of what is "inappropriate development" that may affect activities discharging contaminants to air. Minor amendments to clause a) and the Explanation will make the Policy and the Explanation clearer and avoid any potential confusion. The amendments do not change the intent of the Policy, and it will still achieve Objective 2.

Revised Text

Policies

2. Management of adverse effects of the discharge of contaminants to air shall include consideration of the following:

- a) Reverse sensitivity, including the siting of new, incompatible inappropriate development in proximity to activities that discharge contaminants to air;

Explanation to the Policies

Paragraph 3. The matters listed in Policy 2 are potential issues and tools commonly associated with managing discharges of contaminants to air (other than domestic fires outside the Reefton Airshed). Reverse sensitivity effects can occur when *new* sensitive activities are inappropriately located in close proximity to activities which discharge contaminants to air.

Decision Requested: 10.17

Submitter 21 FFNZ

Submission

Federated Farmers welcomes the fact that the Regional Council has considered reverse sensitivity issues in how to manage the adverse effects of discharges to air. Federated Farmers supports the recognition that sound planning requires some strategic consideration of what types of activities may be deemed sensitive and how incompatibilities can be addressed.

Recommendation

Accept

Reason

The support is acknowledged. However, in response to Decision Requested 10.16, minor amendments are proposed to the wording of Policy 2 and its associated explanation.

Decision Requested: 10.18

Submitter 21 FFNZ

Submission

We support the use of good management practice guidance for the protection of air, and welcome the opportunity to develop appropriate guidance for farmers within the West Coast region. It is essential that good management practices are only determined following rigorous consideration of the costs and benefits of the best practicable options for managing air and odour discharges from farms.

Recommendation

Accept

Reason

The support is acknowledged. However, in response to Decision Requested 10.16, minor amendments are proposed to the wording of Policy 2 and its associated explanation.

Decision Requested: 10.19

Submitter 44 NZCC

Submission

Support Policy 2.

Relief sought:

Nil

Recommendation

Accept

Reason

The support is acknowledged.

NEW POLICY

Decision Requested: 10.20

Submitter	14	CPHWC
Support	28	INTAF
Support	33	KMTC
Oppose	21	FFNZ
Oppose	54	STRAT

Submission

It is unfortunate that this RPS, which has far reaching implications, has decided that 'greenhouse gas emissions are national and international issues for central government to deal with'. The West Coast could choose to have a policy for managing greenhouse gases which would benefit our population in the long term.

Further submission (INTAF & KMTC)

Support

Further submission (FFNZ)

FFNZ are of the firm view that addressing greenhouse gases is a national issue and should be addressed at that level.

Further submission (STRAT)

Under sections 70A and 104E of the RMA, councils are prevented from addressing greenhouse gas emissions directly, That is because this matter is addressed under the Climate Change Response Act 2002.

Recommendation

Reject

Reason

If a policy is added to the Proposed RPS to reduce greenhouse gas emissions, this has to be given effect to in the Regional and District Plans. However, Sections 70A and 104E of the RMA state that "...a regional council must not have regard to the effects of such a discharge on climate change...". As this is a central government responsibility, there is no need to add provisions for reducing greenhouse gases in the Proposed RPS.

EXPLANATION TO THE POLICIES

Decision Requested: 10.21

Submitter

28, 33

INTAF, KMCT

Submission

Amend the Explanation to the Policies: "~~....Reverse sensitivity~~ compounding effects can occur when ~~sensitive~~ further air discharging activities are inappropriately located in close proximity to activities which discharge contaminants to air. In conjunction with Policy 2 of the Use and Development of Resources Section, this Policy 2 allows for the consideration of the siting and establishment of subdivision, use and development to avoid, remedy or mitigate ~~reverse-sensitivity~~ compounding effects."

Recommendation

Reject

Reason

The submitter appears to be confusing reverse sensitivity effects with cumulative effects, which are different types of effects. There are specific polices in regional plans for managing cumulative effects, and these do not need to be duplicated in the Proposed RPS.

METHOD 1

Decision Requested: 10.22

Submitter

12

CAYGJ

Support

19

ELWEP

Submission

As a bare minimum, Method 1 should be implemented unconditionally, with funding made available to provide education and advice on how PM10 emissions can be reduced from domestic solid fuel burners. Other more proactive policies and methods should be included in the Regional Air Quality Plan.

Further submission (ELWEP)

I support this submission. My reasons are aligned with those of the submitter.

Recommendation

Reject

Reason

Council would like to have the resources to commit to providing education on reducing emissions from domestic burners over the next 10-15 years, however this is not the reality. It is therefore more appropriate that Method 1 is optional, depending on annual budgets from year to year.

No recommendations can be made in this RPS review process on the provisions in the Regional Air Quality Plan.

Decision Requested: 10.23

Submitter	14	CPHWC
Support	28	INTAF
Support	33	KMTC

Submission

While coal remains relatively cheap on the West Coast, domestic fire emissions impact on PM10 levels in the air. The method identified by Council to '*consider providing education and advice on reducing PM10*' is unlikely to be very effective unless opportunities to improve housing conditions (e.g. retrofitting insulation and installation of clean-air burning fires so people are less dependent on burning fossil fuels) is supported across the West Coast.

Further submission (INTAF & KMTC)

Support

Recommendation

Reject

Reason

We agree that improved home insulation can help to reduce domestic burner emissions, and there are other options, for example, new technology, that can also reduce emissions. Councils generally use a combination of methods, and ultimately the most cost-effective tools, to encourage or require households to reduce their burner emissions. Education and advice is a straightforward, non-regulatory tool for encouraging change in people's attitudes and behaviour regarding burner use, and this is considered appropriate in the West Coast Proposed RPS.

Decision Requested: 10.24

Submitter	28, 33	INTAF, KMCT
Oppose	54	STRAT

Submission

Education in this area is essential, especially the use of coal. John Grant, in 1662, looked at mortality records in London, England, and discovered that the leading cause of death in London was lung disorder. John Evelyn said, at a similar time, "so vile are these effusions they can be smelled miles away from London, and London resembles the fires of Hell". Alfred Russel Wallace (cofounder of the theory of evolution) said, "The foul effusions from the industrial evolution threaten humanity". The great 1952 smog of London killed 12,000 people. Not only is coal a producer of copious CO2 but it is also an emitter of mercury, cadmium, uranium and other noxious elements, including carcinogenic polycyclic aromatic hydrocarbons which is particularly abundant in smouldering coal fires. Lung cancer can come from the radioactive emissions. Coasters need to be encouraged to find alternatives to this filthy substance, for their own and their neighbours' health and wellbeing. Individual complaints about adverse effects of coalsmoke on themselves and their families, gardens and properties need to be taken a lot more seriously than they are, and acted on to ensure that all people on the coast can breathe fresh, uncontaminated air. It is not just the PM10 that needs to be controlled but the type of air emissions. Attracting people to the coast would be easier with cleaner winter air.

Relief sought:

Amend Method 1: "~~Consider providing~~ *Provide education and advice on how PM10 and toxic emissions can be reduced from domestic solid fuel burners, subject to available funding.*"

Further submission (STRAT)

This submission point contains numerous errors of fact and innuendo as far as New Zealand coal, and weather conditions in New Zealand, are concerned. For example, NZ coals are not radioactive, and they contain negligible levels of mercury. The West Coast is not like London, in 1662 or 1952. Emissions of PM10 depend significantly on the design, installation and operation of burners, as well as the type of fuel used. For example, wet wood will produce a great deal of PM10 emissions. As to the contribution of coal, PM10 levels depend on the foregoing factors as well as the moisture content and grade of the coal.

Recommendation

Accept in part

Reason

Council recognises the value of providing education as a way of changing household burner use to reduce chimney emissions. However, having a blanket statement that education will be provided is considered inappropriate as when and where this is undertaken will depend on Council's resource management priorities from year to year. It is recommended to amend Method 1 to clarify this, noting that the Method should remain optional so the Council can

take into account when and where the need is the greatest.

The inclusion of the word "toxic" as suggested by the submitter is not considered to add further value to Method 1. This word is an emotive term and is inappropriate in this context.

Revised Text

Methods

1. Consider ~~providing~~ *Provide* education and advice on how *particulate matter* emissions can be reduced from domestic solid fuel burners, *when necessary*. ~~subject to available funding.~~

METHOD 2

Decision Requested: 10.25

Submitter

28, 33

INTAF, KMCT

Submission

Discharge of contaminants to air from domestic fires is dealt with under the Regional Air Quality Plan passing responsibility over to the district council, which deals with them through the Health Act; this needs to be expressed in the RPS.

Relief sought:

Amend Method 2: "*Allow discharges of contaminants to air and manage the effects through Regional and District plan rules, and resource consents (apart from domestic fires outside the Reefton Airshed).*"

Recommendation

Reject

Reason

The Regional Air Quality Plan has no rules for managing discharges from individual domestic fires in the Region as the numbers of these makes it too costly and impractical to enforce. It is therefore appropriate to exclude individual domestic fires from Method 2, except for those in the Reefton Airshed. When the Regional Air Quality Plan is reviewed, Council intends to add policies and rules to manage individual discharges from domestic burners in the Airshed zone, to meet the requirements of the National Environmental Standard for Air Quality.

NEW METHOD

Decision Requested: 10.26

Submitter

37

MAITG

Submission

I would like to see the Regional Council become more proactive in educating people about the dangers of burning CCA treated timbers, plastics and custom wood on domestic and rubbish fires. And to make people aware that is an offence to do so. These materials are extremely toxic to human health.

Recommendation

Noted

Reason

The submitter has not specifically requested a change to the Proposed RPS.

Education is generally prompted by an increase in the number of complaints Council receives about a type of activity. Compliance investigations are an opportunity to educate about why burning of these materials is prohibited. These incidences are relatively infrequent, and so adding a new method is considered unnecessary. Council can undertake education on this matter in the future as and when needed without having a specific method in the RPS for it.

Decision Requested: 10.27

Submitter

37

MAITG

Submission

Education, to domestic users on the importance of burning dry firewood and using efficient coal burning fires would be the way to go.

Recommendation

Noted

Reason

Staff agree that education on these matters, amongst other things, can contribute towards reducing domestic burner emissions. Method 1 covers this, and a new method is unnecessary.

ANTICIPATED ENVIRONMENTAL RESULTS

Decision Requested: 10.28

Submitter 47 PERKI

Submission

These sections need to be clearer on the potential environmental results and outcomes that may arise from the policies. At present they are vague and generally do not reflect environmental outcomes.

Recommendation

Reject

Reason

The submitter has not suggested any alternative wording to make the Anticipated Environmental Results (AER's) clearer. The RPS is a broad, high-level, strategic document for the whole Region, and the AER's do not need to be detailed.

ANTICIPATED ENVIRONMENTAL RESULT 1

Decision Requested: 10.29

Submitter 28, 33 INTAF, KMCT

Submission

The air in Westport is foul on winter evenings due to the coalsmoke, Although it is just a chimney here and there emitting, those chimneys can foul up a whole neighbourhood. WCRC has monitored air quality in Westport but the monitors are not in places that are the most affected. The air quality in Westport badly needs improvement.

Relief sought:

Amend AER 1: "Reduced PM10 levels *and associated toxic contaminants* in Winter in ~~some~~ *all urban residential and rural-residential* areas."

Recommendation

Reject

Reason

Refer to the reasons given under Decision Requested 10.3. These reasons apply to this submission point.

ANTICIPATED ENVIRONMENTAL RESULT 2

Decision Requested: 10.30

Submitter 11 CALCN

Support 30 WILLJ

Submission

The toxic dust from 1080 aerial operations is uncontrolled and poses a health threat when these operations are close to communities and rural dwellings. This dust can spread up to 5km from proposed buffer zones and is not taken into consideration presently.

Decision sought:

Under Anticipated Environmental Results: "*Odour, dust, smoke and other contaminant emissions are discharged at acceptable levels under the RMA, enabling resource use and development to occur for people's social, cultural, economic and physical well-being.*"

Further submission (JOHNW)

I support this submission for the following reasons. Who can tell me what damage to the environmental is caused by the toxic dust that covers every square metre of the forest flood during 1080 operations? The answer is no body can, because nobody knows.

Recommendation

Reject

Reason

The suggested amendment is considered unnecessary, and does not fit with the meaning of the AER. The term “*acceptable levels under the RMA*” refers to nationally recognised guidelines for levels of contaminants discharged to air. These guidelines are set to ensure that human health is not significantly impacted, and they are taken into account when assessing resource consent applications, and added as conditions of consent where appropriate. Human health is implicit in the purpose of the RMA. For some discharges such as 1080, Ministry of Health approval is required in addition to resource consent.

Decision Requested: 10.31**Submitter**

28, 33

INTAF, KMCT

Submission

Amend AER 2: “*Odour, dust, smoke, and other non-toxic contaminant emissions are discharged at acceptable levels for people, community and environmental health and wellbeing, under the RMA, whilst enabling resource use and development to occur within the bounds of the RMA. for people’s social, cultural and economic wellbeing.*”

Recommendation

Reject

Reason

The suggested amendment is considered unnecessary. The term “*acceptable levels under the RMA*” refers to nationally recognised guidelines and standards for levels of contaminants discharged to air. These guidelines are set to ensure that human health is not significantly impacted, and they are taken into account when assessing resource consent applications. In some cases standards are added as conditions of consent. Human health is implicit in the purpose of the RMA and must be taken into account.