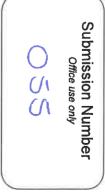


Submission Form

Send your submission to reach us by **4.00 pm** on **Wednesday, 18 April 2018**



Whakatāne 3158	PO Box 364	Bay of Plenty Regional Council	Post: The Chief Executive or Fax: 0800 884 882
			or email: air@boprc.govt.nz

Submitter Name: Mark Self. CEO, Genera Limited.

This is a submission on Proposed Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

I could not gain an advantage in trade competition through this submission.

- I am directly affected by an effect of the subject matter of the submission that adversely affects the environment; and
- My submission does not relate to trade competition or the effects of trade competition.

<u></u>

- 2 The details of my submission are in the attached table.
- 3 I wish to be heard in support of my submission.
- If others make a similar submission, I will consider presenting a joint case with them at a hearing

Email: Address for Service of Submitter: Telephone: Genera Limited. 11 MaruStreet, Mount Maunganui South Mark.self@genera.co.nz Daytime: 07 575 6530 Fax:07574750 After Hours:

BOPRC ID: A2802144

CONTACT PERSON: Mark Self

SUBMISSION POINT	CONTACT PERSON:
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Page No	Reference	Support/Oppose	Decision Sought	Reason(s) / notes
P149	7.8.3 Options 3	Qualified Support	We seek the adoption of an option, to manage	Our preferred option recognises the technical
			fumigation that is based on;	expertise of the EPA and the mandate that it has
			1. General rules within the proposed plan,	to protect the environment while carefully
			2. Regional Policy Statement	balancing social, economic, safety, and
			3. Draw where appropriate on those provisions	environmental factors to ensure evidence based
			of the RMA and HSNO Act that regional councils	decisions. We note Option 3 acknowledges the
			are bound to while	expertise of the EPA. The agency has the mandate
			4. Respecting the expertise and decisions of the	to protect the environment and to consider
			Environmental Protection Authority and not	social, economic, safety, and environmental
			imposing greater unwarranted 'protections'.	factors to make balanced evidence based
				decisions for New Zealand.
				The EPA processes require a public submission
				stage when hazardous substances are assessed.
				This democratic process provides for scrutiny of
				the EPA's assessment, risk evaluation (through
				the application of robust science assessment) for
				the views of sector and the community to be
				heard prior to the EPA making its final decision
				and setting controls.
P150	Option 3		Ditto.	We note the use of the words 'less stringent' with
				regard to Option 3. The provisions of the
				proposed option 3 are not 'less stringent' they are
				should be in relation to the legislation and
				rogularly implements. They are also technically
				וכצעום ויין ווויין וויין מוכן מוטט נכנון וויכמווע

CONTACT PERSON: SUBMISSION POINTS

Page No	Reference	Support/Oppose	Decision Sought	Reason(s) / notes
P151	Effectiveness		We seek balanced decisions informed by	The assessments of effectiveness in the analyses
onward	statements and		science made by appropriately qualified and	and the allocated scores in the document do not
	scores		informed decision makers.	appear consistent with objective analysis based on known technical knowledge.
	Costs / benefits		Ditto	We consider that more work needs to be done on
				the costs / benefits.
147	Option 1	Support as an	If Option 3 is not adopted then Genera ask that	We consider that more work needs to be done to
		alternative	a reasonable period of consultation occurs to	clarify status quo. If option 1 was applied
			clarify what status quo means.	objectively using standards set by EPA rather than
				imposing arbitrary additional standards we would
				support option 1.