



**BAY OF PLENTY  
REGIONAL COUNCIL  
TOI MOANA**

## Submission Form

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

Submission Number  
*Office use only*

078

<b>Post:</b> The Chief Executive Bay of Plenty Regional Council PO Box 364 Whakatāne 3158	<b>or Fax:</b> 0800 884 882	<b>or email:</b> air@boprc.govt.nz
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**Submitter Name: Bioenergy Association**

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.

- (a) I **am not** directly affected by an effect of the subject matter of the submission that adversely affects the environment; and
  - (b) My submission **does not** relate to trade competition or the effects of trade competition.
- 2 The details of my submission are in the attached table.
  - 3 I do not wish to be heard in support of my submission.
  - 4 If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Date 18 April 2018

**Address for Service of Submitter: PO Box 290, Whangarei 0140 Telephone: 0274771048**

**Email:**

Brian.cox@bioenergy.org.nz

**Fax:**

Contact person: Brian Cox

**SUBMISSION POINTS:**

Page No	Reference (e.g. Policy, Rule, Method or Objective number)	Support/Oppose	Decision Sought  Say what changes to the plan you would like	Give Reasons
	AQR10	Oppose	The combustion of contaminated material should allowed provided the emissions discharge to air are within the consent conditions for discharge to air.	A complete ban is inappropriate if the applicant can install equipment which will allow combustion to be within the appropriate environmental conditions. This should be supported by a condition setting out monitoring so that it can be proven that the consent conditions are being met.
	AQR10	Oppose	The standard for wood pellets is not appropriate and the international standard as adopted by the sector ISO 17225-2 should be used	The standard referenced is a testing and not a production standard.
	AQR18	Oppose	The wording of the rule should be made consistent with other regional rules. There is no provision for boilers above 10 MW to be at least discretionary uses	Bioenergy Association is undertaking a study of the regional rules relating to combustion plant and while the rule appears to be ok it is inconsistent with other regional rules and effort should be made to make all regional air discharge rules similar.