

Further Submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

Clause 8 of Schedule 1, Resource Management Act 1991

Please send your submission to be received by **4:00 pm on 31 July 2018**

Further Submission Number
Office use only

FS14

To: The Chief Executive
Bay of Plenty of Regional Council
PO Box 364
Whakatāne 3158
EMAIL: air@boprc.govt.nz

From: Envirosolve Ltd / Dr Rene Haeberli
[If name of the person or organisation making the submission:]

This is a further submission in support of or opposition to a submission on Plan Change 13 (Air Quality) to the Regional Natural Resources Plan

I do wish to be heard in support of my further submission.
[Delete as required]

If others make a similar submission I would not be prepared to consider presenting a joint case with them at any hearing.
[Delete as required]

I am:-
[Please tick one]

- a person representing a relevant aspect of the public interest. *(Specify upon what grounds you come within this category.)*
 a person who has an interest in the proposal that is greater than the interest the general public has. *(Specify upon what grounds you come within this category.)*

On the following grounds:

Emission should be of everybody's interest because affects everybody regarding health issues, which are very costly (HAPPNZ report 2012). But it will also affect even more as New Zealanders and when will would like to sustain our Green, Clean and 100 % pure image towards the world. It helps and speed up the zero and carbon free goal.

Signature *[of person making submission or person authorised to sign on behalf of person organisation making submission.
Signature is not required if you make your submission by electronic means]*



133 Opaikune Road, RD 3 Whanganui/Raetihi

Address for Service *[Provide full postal details:]*

Telephone: 021 24 24 211

After Hours: 021 24 24 211

Email: rene.haeberli@xtra.co.nz

Dr Rene Haeberli

Contact person *[Name & Designation if applicable:]*

Note: A copy of your submission must be served on the original submitter within 5 working days after making this further submission

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rene.haerberli@xtra.co.nz

Contact person *[Name & Designation if applicable]:*

Dr Rene Haerberli

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FURTHER SUBMISSION POINTS:

Submission Number <i>[Submission number of original submission as shown in the "Summary of Decisions Requested" report]</i>	Submitter Name <i>[Please state the name and address of the person or organisation making the original submission as shown in the "Summary of Decisions Requested" report]</i>	Section Reference <i>[Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposed plan change]</i>	Support/Oppose	Reasons <i>[State in Summary the nature of your submission giving clear reasons]</i>
34 -1	McAlpines Rotorua Ltd		Support and amend	There is high sophisticated technology available which can minimize the contamination for domestic burner but also industrial boilers. The stake emission should be measured on a yearly base and not exceed 25 mg/m ³ up to 1 MW boilers and not more than 50 mg/M ³ for over 1 MW boilers (Wood and existing coal boilers)
74-2	Bay of Plenty Regional Council	All section	Oppose and amend	All burners from (a -d) could be retrofitted with high sophisticated secondary emission devices which will have an immediate effect on the air quality for the next 10 - 15 years and is independent from the burner underneath. The technology of burners is not as advanced and proofed yet what the industry tells you.
11-4	Waikato Regional Council		Neutral	Why councils like to support lots different studies instead of avoiding emission with secondary emission devices at the first place? With the amount of money spent for studies you could solve the problem in a very short time with the same money.

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11-4	Waikato Regional Council		Neutral	Why councils like to support lots different studies instead of avoiding emission with secondary emission devices at the first place? With the amount of money spent for studies you could solve the problem in a very short time with the same money.
38 - 1	Richard Mallinson		Support and amend	Wood merchandises should be licenced and randomly controlled if they are selling fire wood to moisture specification and they have to comply. Secondary retrofittable emission devices are the key for clean air.
38 - 4	Richard Mallinson		Support and amend	Old wood burner should be a permitted activity fitted with a secondary emission device.
38 -9	Richard Mallinson		Support	Financial from councils or government is need to clean the air up quickly. Secondary emission devices are not as expensive than new burners, which not only the burner cost but installation as well.

39 -1	Kay Richards		Support	On line on the roof testing is available in New Zealand and will tell you the true emission of any fire (old, low emission and ULEBs) at any stage of the fire burning (start-up, hot or end phase).
39 - 7	Kay Richards		Support	Do not ban wood burners. Make the old one cleaner with secondary emission devices. Wood is renewable and carbon neutral and it is not a fossil fuel like coal, oil and gas.
29 – 7/ 29 - 8	Envirosolve		Amend	<ol style="list-style-type: none"> 1. Emission should be measured in mg/m³ to bring us closer and comparable with other world standards. 2. Emission limit until 1 MW boiler: 25 mg/m³ 3. Emission limit over 1 MW boiler: 50 mg/m³
49 - 2	Chris & Carol Meijer		Support	There is no need for taking wood burners away. They will help towards the goal for zero energy and carbon neutral New Zealand. The emission can be taken care of with secondary emission devices which can be retro-fitted.
49 - 7	Chris & Carol Meijer		Support	Wood burners are the most efficient heating and the most affordable one. Many people have access to wood and especially in Rotorua as well as Tokoroa and many people work in the industry and their fire wood is freely accessible and with no cost attached. Saturday wood chopping with family and friends. Social aspect as well.
60 -1	New Zealand Home Heating Association		Neutral	POS does not make sense. Phase the older wood burners out and allow new technology in so older wood burners can be use longer with less cost especially old wood burner with wet backs. Secondary emission devices.

60 -3	New Zealand Home Heating Association		Support	Allow ULEBs (and not only pellet burners) for houses with no burners are allowed.
60 - 5	New Zealand Home Heating Association		Support	Low Emission burners are need at least double the amount of wood and therefore double amount of the emission. Please have a look in Christchurch where they are running out of dry fire wood now. Does not make sense and putting a bylaw in from 0.7 g/kg to 0.6 g/kg does not make any sense at all.
60 - 6	New Zealand Home Heating Association		Support	Totally agree that wood merchants has to be licensed and randomly checked that they sell dry wood.
74 -4	Bay of Plenty Regional Council		Oppose	Canterbury Method 1 is much stringent and real life test despite that is not legally bind in the 4012/4013 but these ULEBs are cleaner. Most of your 382 authorized burners would not pass CM1 test because they are all tuned to the rules (hot phase) in the lab. Real life is total different and on the roof tests for emission is available in NZ.
74 - 7	Bay of Plenty Regional Council		Neutral	You are discussion now the second decimal for your limit. Did somebody question the variability of a lab test when you would repeat (10, 20, 30 % ??) and we not even talk about in real life where people using all sorts of wood with different moisture as well.
74-5	Bay of Plenty Regional Council		Oppose	Please see 74 - 4

74 - 8	Bay of Plenty Regional Council			Please see 74 - 7
60 - 2	New Zealand Home Heating Association		Oppose	The fact is that we do not have to wait much longer with reducing emission causing health issues and of course a lot of money. Furthermore, you can't promote Green Clean and 100 % image and treat the air so badly. You have to acknowledge that technology is available but you have to use it. Very quick, very efficient and cost effective.
74 - 6	New Zealand Home Heating Association		Oppose	Please see 74 -4. It is necessary to take pragmatical approach and that means common sense is required. Accept ULEBs which are slightly over 0.6 g/kg because they are tested under real life condition and not only under tuned lab condition
70 - 2	Rotorua Heating Solutions		Support	One rule for all.

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