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## SUBMISSION

### SECOND GENERATION REGIONAL AIR PLAN

17 June 2016

Bay of Plenty Regional Council  
PO Box 364  
Whakatane 3158  
Via [air@boprc.govt.nz](mailto:air@boprc.govt.nz)

Attention Karen Parcell and Stephen Lamb  
Via [karen.parcell@boprc.govt.nz](mailto:karen.parcell@boprc.govt.nz) ; [Stephen.lamb@boprc.govt.nz](mailto:Stephen.lamb@boprc.govt.nz)

Dear Karen and Stephen,

Thank you for meeting with Nikki Anglesey and I at your rooms, and later attending our Regional Meeting held at the Holiday Inn on 7 June 2016.

We acknowledge that you have been mandated to replace the current Regional Air Plan with a second generation Regional Air Plan, following a Review undertaken in 2013.

The Association is opposed to the proposed 'draft New Plan' in its current state as we have advised you.

The Regional Plan covers the whole Bay of Plenty Region, including the coastal marine areas, and including the Rotorua Urban Airshed. It has been noted that your discussions to the Association suggest that only the Airshed is affected. However, this is not the case. As you note in your discussion document, there is a growing trend to have all regional plans as one single document which *could* be incorporated into a single Bay of Plenty Regional Plan.

While that may not be the approach you have taken in documenting your proposal, it is an important factor that means you must open the discussions up to the entire region, and extend all your advertising and consultation to every consumer, manufacturer, retailer and installer in those regions.

It is our view that a reduction of emissions to 3 exceedances by 2018 is unrealistic and is not achievable. There is value in setting a goal to lower emissions by 2018, and then evaluating the reduction and setting a new goal. To expect emissions to have an immediate affect by 2018 is not reasonable, particularly with the low buy in from manufacturers, retailers and installers due to the lack of consultation and a lack of understanding by consumers due to miscommunication, late advertising and mixed or incorrect messages from your frontline staff.

It is an error to conclude that the only emissions contributing to the current levels are wood burners. We do not accept your view that the plan is limited to the management of air contaminants from human activities. Contaminants from other sources such as pollen, Hydrogen Sulfide and Sulphur Dioxide must be considered and documented as contributing factors. There are also other factors such as Vehicle Emissions, particularly Diesel which contribute and these should also be considered and noted in any plan.

We accept the Council is keen to include some new technologies such as the Ultra-Low Emission Burners (ULEB's). However, the Association is strongly opposed to this. These burners have no agreed testing method to date, and no testing has been approved. While there are burners on the market, these have not been tested or approved to meet environmental requirements. There has been no sign off by the Ministry for the Environment under the Resource Management Act and the National Environmental Standards have not changed.

It is proposed that the Council makes a move towards improving emissions through consultation with key industry stakeholders, such as NZHHA members, and through an education program targeted at ensuring all consumers, particularly those in the low socioeconomic group burn their fires clean.

There are a number of initiatives that can be implemented that will assist you to reduce emissions by 2018, without applying restrictions to consumer choice. These include:

- Reducing allowable fires from 1.5 gram/kilogram to .7 gram/kilogram lab tested, will have an effect on reducing emissions by 2018 but it will also give low economic consumers a better choice than restricting them to purchasing ULEB's only.
- Requiring all new installs to be undertaken and approved by a NZHHA Registered Technician. This will ensure all fires are installed to manufacturer's instructions and comply with AS/NZ 2918:2001.
- Requiring all new installs, or fires that don't currently have a compliance certificate, to be inspected and certified by a NZHHA Registered Technician subject to Council approval. This will significantly reduce emissions caused by incorrect installations by plumbers and builders who have not undertaken any training.
- Increase training to consumers. NZHHA can provide training via a number of methods, direct in home training, to groups such as Lions and Rotary Clubs,

community training such as libraries as well as producing written material and brochures to assist clients to light and run their fires correctly.

- Implementing a spot check and penalty scheme. An example of this is Christchurch where they have staff especially appointed to work with consumers who are not meeting emission expectations. They test for fires that are not burning cleanly and approach the home owner or tenants for educating. Consumers have three opportunities to implement the learnings or risk a financial penalty.
- Work with Wood Merchants and set expectations for moisture levels. The Council can introduce penalties for merchants exceeding moisture limits. Work and Income can remove them from their preferred supplier lists if and provide brochures and information on the types of wood that should be purchased and burnt by consumers.

Implementation of these initiatives will allow time for ULEB and any other appliances or products being developed or tested, to be approved, before you consider expanding the scheme to including banning consumer choice in 2018 or 2020.

We look forward to meeting with you again to assist you in the development of a draft regional plan that benefits consumers and successfully reduces emissions for your region.

Regards



Gavin Edwards  
President