

Workshop notes

Air quality

Friday 24 October 2014

Workshop lead – Jon Trewin

Attendees

Riaan Elliot, Refining NZ

Scott Williams, Harrison Grierson

John Sinclair, the aviation Industry Association of NZ (Inc)

Jay Bryant, CEO/pilot, Northland Helicopters Ltd

Richard Gardner, Federated Farmers of NZ

Lynette Wharfe, Consultant, The AgriBusiness Group

Kaylee Wilson, Opus

Regional council staff

Ben Lee, NRC

Michael Payne, NRC

Stuart Savill, NRC

Part 1: Air Quality Issues

- Do you agree with the issues?
 - General?
 - Resource specific?
- Are there issues that we have missed?

Part 2: Air Quality Solutions

- Do you agree with the solutions?
 - General?
 - Resource Specific?
- Are there solutions that we have missed?

Notes from the open discussion on Air Quality Issues:

General Discussion

- The group would like to see NRC data on the urban-rural split for air complaints/incidents, what constitutes a significant air incident and if possible data on horticulture related complaints.

- Abrasive blasting - if we have a permitted rule for booth blasting we may want to consider filtration standards down to PM10. Needs to have black and white performance based standards in order to work.
- Question about panel beaters and other spray painters as same issues arise with filtration and booth spraying - mostly a health and safety issue. NRC is not receiving many complaints about spray painting however.
- Fertiliser - NRC does get some complaints about fertiliser discharge which is permitted. Growsafe does not apply to the application of fertiliser. Accidental application of fertiliser to water is something the plan review needs to look at.
- Reverse sensitivity is an issue at the rural residential and rural boundary. Also at the urban-industrial boundary - odour and noise are the big issues. Refinery does actively get involved in consents for subdivisions in this regard. Particularly concerned about mixed use industrial and commercial.
- Some feeling that plans should promote buffers to manage effects - polluter should provide their own buffers.
- Auckland plan approach where air quality rules are tied to district plan zoning appears to work quite well but NRC may have issues administering a similar approach as district council zones are outside their control.
- Question about whether there is going to be a link between the regional air plan and the Marsden Point Air Quality Strategy? Policy is already in place in the current plan that incorporates the strategy.
- It was stated that other councils are looking at setting air quality limits below NES standards using stricter World Health Organisation standards - Auckland being an example. NRC do not have plans to set standards below the NES.
- Need to talk to district councils about what odour controls they may be thinking about - particularly WDC and their latest rural plan change (Plan Change 85).
- Question about whether dust from 1080 captured by dust rules in regional air plan? No, but it is treated as a hazardous discharge to land/water and is captured under corresponding rules in the Regional Water and Soil Plan.
- Auckland approach - distinguishing between rural and urban air quality - general agreement that it was a good approach.
- In current air plan issues quite prescriptive but objectives are broader. Policies then get prescriptive.
- 'Aerial application' not a defined term in the air plan and therefore there is the potential for interpretation issues.

Spraydrift

- Ground and aerial controls are now quite onerous - would not necessarily want those controls coming down to the level of hand held spraying.
- It was stated that around 95% of spray complaints are from people that have not been notified.
- Accreditation is an industry issue and can be taken away as well as conferred. Growsafe certification provides extra assurance that things are being done correctly. There is a database of Growsafe certified applicators.
- Under the terms of HSNO, currently people need approved handler certifications for using a lot of chemicals. As HSNO is under review, there are likely to be changes to the approved handler requirements.

- Notification is the biggest issue for aerial application - if people know then they are less likely to complain. A requirement for 18 hour (or more) notification is an issue (too onerous).
- Question about defining sensitive areas - for example the definition in the air plan includes production forests. NZ Standards 8409:2004 has a definition of what constitutes a sensitive area.
- Use of 2-4D Ester outside of winter months. This rule is good as it encourages people to use alternatives. Might be easier to just leave this rule in place with no changes as the product is being phased out by industry.
- A comment that there should be consistency between the regional plan rules around air and the regional pest management plan. To this end, the plan should provide for the burning of pest material.
- Rogue operators who don't have accreditation can be an issue however there is a grow safe register/database.
- Droplet size and wind the key factors for determining drift.
- Hawkes Bay Regional Council have rules that combine air, land water discharge together - comment made that this is considered to be a good thing.
- Comment that there is an opportunity for NRC to attend a field day demonstrating the use of sprayer technology. Helicopters are generally placement sprayers in that they can have a high level of accuracy.
- Notification should be limited to the area being sprayed rather than blanket notification of people adjoining the property
- Comment that the requirement for a 20m setback from water can be an issue for some sprayers. Again, placement sprayers can place within the metre and are highly accurate. Suggestion the buffer requirement from the boundary of waterways should be changed to no discharge directly to water.
- Discussion on off label uses. The air plan rules limit the use of chemicals to label requirements. It is however fairly common for applicators to use some chemicals for uses other than what is on the label requirements. Most of the time this is fine but not always. A solution may be for industry to work with regulators to change what goes on the labels.

Poultry Farming

- Comment that use of the FIDOL principle is good and should remain.
- Poultry industry has issues with different sized buffer requirements between district and regional plans and would therefore like more consistency. Odour and noise are the main sources of complaint. Poultry industry is concerned that poultry farming needs to be seen as a form of intensive farming. Any future plan should therefore quantify what intensive poultry farming is, introduce a definition, and set bird numbers that defines intensive poultry farm from those people who may keep domestic poultry.
- The odour from poultry intensive farming should not be compared to those objectionable odours from mining, landfill and waste treatment ponds activities (as in the current air quality plan). Poultry farming is an anticipated rural activity within a rural area, rural areas have a certain anticipated level of odour e.g. odour associated with dairy farming, poultry farming etc...
- Poultry industry concerned about reverse sensitivity effects around rural residential growth and related complaints of odour and noise.
- Comment that lumping poultry farming in with wastewater and other industrial processes (for the purposes of controlling odour) is problematic. They are different activities and poultry farming is a rural activity. Would be useful to separate poultry farming out as an intensive farming activity - perhaps a definition of over 2000 birds. Remove factory farming definition (factory farming is an antiquated term).
- Comment that having one regional plan a good thing - avoids confusion and double up.
- Suggestions of some good plan examples of managing odour? For poultry, Horizons One Plan has a good set of rules. As stated, FIDOL principles are important for poultry industry and it is good that the plan defines them. Beyond the boundary threshold is key - poultry industry is keen for this to be retained.
- Comment again on poultry odour effects being lumped in with other activities. Poultry is different. Piggeries are separated out (in the current air plan) but not poultry. Would like it to have its own rule with threshold based on number of birds.
- Comment that there is likely to be an increase in poultry farms in time (this includes Northland). Flat land is key for establishing poultry farms.
- Comment that when enforcement action is taken for odour it would be good to get feedback on whether or not an odour is offensive.