



# **Submission on Proposed Amendments to the National Environmental Standard for Air Quality**

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## Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's *Proposed Amendments to the National Environmental Standard for Air Quality 2020*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000, the Health Act 1956, and the Biosecurity Act 1993.
3. This submission sets out particular matters of interest and concern to NMH around environmental and public health matters.

## General support

The comments reflect the numbering in the consultation document

4. NMH supports the intention of the proposed amendments to strengthen air quality standards overall by better controlling the release of fine particles into the air.
5. (Question 1) NMH agrees that the proposed PM<sub>2.5</sub> standards should replace the PM<sub>10</sub> standards as the primary standard for managing particulate matter. These more stringent standards will contribute to improving air quality on areas that typically have poor air quality during winter months.
6. (Question 2) NMH agrees that there should be both a daily and an annual standard for PM<sub>2.5</sub>.
7. (Question 3) NMH strongly agrees that the NES standards should reflect the World Health Organisation (WHO) guidelines. In addition, NMH recommends that these standards include provision for future review and the standards are aligned with the revised 2020 WHO guidelines which will be released later this year.
8. (Question 5) NMH strongly agrees that Councils should be required to keep monitoring PM<sub>10</sub> to ensure that trends can be analysed over time. It is critically important that PM<sub>10</sub> and PM<sub>2.5</sub> are continually monitored as PM<sub>10</sub> is not just a proxy measure of PM<sub>2.5</sub>. Evidence shows that there are adverse health effects related to PM<sub>10</sub> which differ from the adverse health effects related to fine particles PM<sub>2.5</sub>.<sup>1</sup> In 2013, WHO published a Review of evidence on health aspects of air pollution (REVIHAAP) which found that

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<sup>1</sup> WHO, 2013. *Review of evidence on health aspects of air pollution – REVIHAAP Project*. Technical Report. World Health Organization Regional Office for Europe. Copenhagen. Denmark.

*"Coarse and fine particles deposit at different locations in the respiratory tract, have different sources and composition, act through partly different biological mechanisms, and result in different health outcomes."*

Therefore WHO emphasise that

*"Maintaining independent short-term and long-term limit values for ambient PM<sub>10</sub> in addition to PM<sub>2.5</sub>, to protect against the health effects of both fine and coarse particles, is well supported from a public health perspective"<sup>2</sup>*

In addition, NMH recommends that the Ministry for the Environment introduces a mandatory annual ambient air quality standard for PM<sub>10</sub> in order to capture the chronic effects of exposure to PM<sub>10</sub>.

9. (Question 7) NMH agrees that an air shed should be deemed polluted if it exceeds either the annual or the daily PM<sub>2.5</sub> standard on at least three occasions. This aligns the standard with the current PM<sub>10</sub> standards.
10. (Question 13) NMH agrees that there should be a new emissions standard applying to all new domestic, solid fuel burners newly installed on properties. NMH notes that this has been restricted to properties that are less than two hectares in size. NMH advocates that this standard is applied to all domestic burners regardless of property size so that all new burners are clean and efficient regardless of location. This is a simpler standard to apply rather than a blanket rule that seeks to create an urban-rural split.
11. NMH notes that the Ministry for the Environment has not proposed a deadline by which the proposed PM<sub>2.5</sub> standards must be met. NMH recommends that this is included.

## **Conclusion**

12. NMH thanks the Ministry for the Environment for the opportunity to comment on the *Proposed Amendments to the National Environmental Standard for Air Quality*.

Yours sincerely



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<sup>2</sup> Ibid pg. 12.