

Objective AQL1 Objective for localised air quality ## 03-007 18 00 - 03-007 20 00

89	J McSweeney	Supports Objective AQL 1.
137	L Griffiths	Retain Objective AQL 1.
201	Ministry For The Environment	<p>Insert a new Policy, explanation, and principal reasons paragraph and method (or similar) under Objective AQL1, as follows: Policy: 'The duration of any permit issued to discharge contaminants into air will be guided by the: i. Level of discharge (mass and nature of discharge); and ii. Current ambient air quality.'</p> <p>Explanation and principal reasons: 'All assessments to establish the appropriate duration of a permit will be undertaken on a case by case basis having regard to the level of the discharge, including mass and nature of the discharge and the and the current ambient air quality which indicates the sensitivity of the receiving environment. Table 1 and the accompanying text will be used as a guide when setting duration of permits. (Refer submission for table.) This policy provides strong encouragement or incentives for new and existing dischargers to take measures to ensure that the effects of their discharges are no more than minor in order to obtain permits for longer duration. It is also helpful to ensure that consent durations are applied on an equitable basis with discharges having like effects in similar environments obtaining similar permit durations.'</p> <p>Method paragraph: 'The method used to implement this policy is" Method used to implement this policy is: Method AQL Assessment criteria Environment Canterbury will use Table 1 (refer submission) and the accompanying text as a guide when setting duration of permits for the discharge of contaminants to air.' (Text to add below the table:) The current ambient air quality is defined in terms of the Regional Ambient Air Quality Target as set out in Policy AQL 9 or where ambient air quality monitoring identifies the air quality to fall within the Alert or Action categories. The level of discharge relates to the mass and nature of the discharge, categorised as follows: (a) A low level discharge is where (i) The emissions control technology or processes employed meets the highest international standards; and (ii) The discharge of contaminants has a ground level concentration in the excellent or good categories in the Regional Ambient Air Quality Targets (for primary air pollutants and priority hazardous air pollutions) set out in Schedule AQL 1. (b) A medium level discharge is where: (i) The emissions control technology is reasonably or commonly available; and (ii) The discharge of contaminants has a ground level concentration in the acceptable categories in the Regional Ambient Air Quality Targets (for primary air pollutants and priority</p>

		hazardous air pollutions) set out in Schedule AQL 1. (c) A high level discharge is where the low and medium criteria are not met.'
239 (point 1)	Telecom New Zealand Ltd	Add at the end of the Explanation and Principal Reasons: "In December 2000 the Ministry of Health and the Ministry for the Environment produced the 'National Guidelines for Managing the Effects of Radio frequency transmitters'. One of the key findings of the guidelines was that there are no established health effects from exposure to radio frequency fields as long as they comply with the new Zealand Standard (2772.1:1999 Radio frequency Fields part 1 – Maximum Exposure Levels 3kHz – 300GHz). Notwithstanding this, for the avoidance of doubt and for the purpose of this Plan, radio frequency fields are not considered to be a contaminant."
239 (point 2)	Telecom New Zealand Ltd	Opposes the lack of certainty. No decision requested.
275	Ravensdown Fertiliser Co-Operative Ltd	Retain Objective AQL1.
338 (point 1)	Transit New Zealand, Christchurch	Clarify the term 'localised contaminant discharges' to show the distance over which localised contaminant discharges will be assessed. Or delete Objective AQL1.
338 (point 2)	Transit New Zealand, Christchurch	Clarify the term 'in combination' to show the area over which discharges will be combined and what discharges will be combined. Or delete Objective AQL1.
338 (point 3)	Transit New Zealand, Christchurch	Clarify the criteria for determining significant adverse effects. Or delete Objective AQL1.
347	Federated Farmers Of New Zealand Inc, North Canterbury Branch	Amend Objective AQL1 so it does not apply to rural zones.
371 (point 1)	NZMP	Clarify the term 'localised contaminant discharges' to provide guidance on the area over which discharges and what discharges will be combined, and determining significant adverse effects.
371 (point 2)	NZMP	Amend Objective AQL1 to read: 'Ensure that contaminant discharges to air do not, either on their own or in combination with other discharges, result in significant adverse effects on the environment, including...'
374 (point 1)	New Zealand Institute For Crop & Food Research Ltd	Clarify what 'localised contaminant discharges' are. Does 'localised' mean, for example, a single chimney or some larger distance from the activity?

374 (point 2)	New Zealand Institute For Crop & Food Research Ltd	Clarify what 'in combination' with other discharges mean. Will it apply to other discharges within e.g., 50m radius or some larger distance? Requires certainty.
374 (point 3)	New Zealand Institute for Crop & Food Research Ltd	Clarify how is a 'significant adverse effect' determined.
378	Canterbury Growers Society Ltd	The objective with a focus on “significant adverse effects” is supported. Make consequential amendments to the Plan to have 'adverse effects' read as 'significant adverse effects' in order to be consistent with Objective AQL 1.
401	NZ Vegetable & Potato Growers Fed. Inc. and NZ Fruitgrowers' Fed Inc.	Make consequential amendments to the Plan to have 'adverse effects' read as 'significant adverse effects' in order to be consistent with Objective AQL1.
434	Mainland Poultry Ltd	As an alternative to withdrawing Chapter 3 (refer 3-0), clarify the terms 'offensive or objectionable odours' and the methods for assessing such effects, including whether or not they apply beyond the property boundary.
435	Tegal Foods Ltd	As an alternative to withdrawing Chapter 3 (refer 3-0), clarify the terms 'offensive or objectionable odours' and the methods for assessing such effects, including whether or not they apply beyond the property boundary.
F135	Westenra Trust	Support submission 434
F329 (point 1)	Lyttelton Port Company Ltd	Opposes submission 201
F329 (point 2)	Lyttelton Port Company Ltd	Supports submission 275
F338	Transit New Zealand	Opposes submission 201
F347 (point 1)	Federated Farmers of New Zealand	Support submission 374 (point 1)
F347 (point 2)	Federated Farmers of New Zealand	Supports submission 374 (point 2):
F347 (point 3)	Federated Farmers of New Zealand	Supports submission 401
F347 (point 4)	Federated Farmers of New Zealand	Supports submission 374 (point 1)
F365 (point 1)	Meridian Energy Limited	Opposes submission 201:

F365 (point 2)	Meridian Energy Limited	Supports submission 338 (point 1):
F365 (point 3)	Meridian Energy Limited	Supports submission 374 (point 1):
F391	Carter Holt Harvey Panels MDF Ltd	Opposes submission 201
F435 (point 1)	Tegal Foods Ltd	Opposes submission 201:
F435 (point 2)	Tegal Foods Ltd	Supports in part submission 338 (point 1):
F435 (point 3)	Tegal Foods Ltd	Supports in part submission 338 (point 3):

Submission Clarification

Submission 137

The submitter supports Objective AQL1 and seeks that it be retained. It is noted that in the summary of decisions requested, the submitter wished to retain 'Issue AQL1'. This should have read 'Objective AQL1'.

Submission 201

There is no policy contained in Objective AQL1 that gives guidance on the appropriate duration of resource consents for discharges to air. The considerations relevant to discharges to air that are contained in the general resource consent duration considerations in Chapter 1 of the NRRP should be used in a specific policy in this chapter. Such a policy could provide strong encouragement or incentive for new and existing dischargers to take measures to ensure that the effects of their discharges are no more than minor in order to obtain permits for longer duration. It is also helpful to ensure that consent duration is applied on an equitable basis with discharges having like effects in similar environments obtaining similar permit durations.

Table 1 that is referred to in submission 201 is as follows:

Table 1: Resource consent duration for discharges to air based on level of discharge and current ambient air quality

Level of Discharge		Current Ambient Air Quality		
		Excellent or Good	Acceptable	Alert or Action
Level of Discharge	Low	21 to 35 years	16 to 20 years	11 to 15 years
	Medium	6 to 20 years	6 to 15 years	6 to 10 years
	High	Up to 5 years	Up to 5 years	Up to 5 years

The **current ambient air quality** is defined in terms of the Regional Ambient Air Quality Targets as set out in Policy AQL9 or where ambient air quality monitoring identifies the air quality to fall within Alert and Action categories.

The **level of discharge** relates to mass and nature of the discharge, categorised as follows:

- (a) A **low level discharge** is where:
- (i) The emissions control technology or processes employed meets the highest international standards; and
 - (ii) The discharge of contaminants has a ground level concentration in the excellent or good categories in the Regional Ambient Air Quality Targets (for primary air pollutants and priority hazardous air pollutants) set out in Schedule 1.
- (b) A **medium level discharge** is where:
- (i) The emissions control technology is reasonably or commonly available; and
 - (ii) The discharge of contaminants has a ground level of concentration in the acceptable categories in the Regional Ambient Air Quality Targets (for primary air pollutants and priority hazardous air pollutants) set out in Schedule 1.
- (c) A **high level discharge** is where the low and medium criteria are not met.

Submission 239 (point 1)

The submitter is strongly of the view that RF (radio frequency) fields are not a contaminant. The submitter is concerned that the construction of the Plan may lead to uncertainty and confusion.

Submission 239(point 2)

The submitter opposes the lack of certainty in Rule AQL57 and the related issue, policy and objective.

Submission 275

Supports Objective AQL1 as discharges of contaminants should not have adverse effects beyond the boundary of the property on which the discharge occurs.

Submission 338(point 1) and 371(point 1)

The submitters consider that the term “localised contaminant discharges” is not sufficiently clear. Further, it is considered that “in combination with other discharges” is unclear as the distance to other emission sources is not specified.

Submission 347

The objective should be specifically targeted at dwellings in urban zones.

Submission 378, 401, Further Submission F347 (point 3)

These submissions support the objective's focus on 'significant' adverse effects. However, concern is expressed regarding the determination of 'what is or is not significant'. It is submitted that other references to adverse effects in the plan should also use the term "significant".

Further Submission F329 (point 2)

Opposes submission 201 as the consent duration criteria are already established under Section 1.3.5 of the plan. The amendments sought are inappropriately prescriptive.

Further Submission F338

Opposes submission 201 as the guidance provided in Chapter 1 is sufficient. It is not necessary to have a policy and method pertaining to consent duration, as this should be determined on a case-by-case basis.

Further Submission F365 (point 1)

Opposes submission 201 as while the submitter agrees with the theory of what is proposed, it is concerned with how such a system would work in situations where there is low background concentrations such as the Waitaki River.

Further Submission F391

Opposes submission 201 as the proposed policy, explanation and principal reasons for duration of consents are not clear as to what is meant by 'level of discharge', or the 'nature of the discharge'. The draft provisions do not focus on the effect of the discharge. The policy and explanation are not consistent.

Further Submission F435 (point 1)

Opposes submission 201 as it is considered that Section 1.3.5 of the Proposed NRRP provides clear guidance for assessing the duration of consents. Section 1.3.5 provides a better assessment tool than the relief sought in the submission. It is also considered that the use of review conditions imposed on consents can be used to ensure that the effects of the exercise of the consent are addressed. The imposition of shorter consent terms as a matter of course would be inappropriate and not address the assessment of effects of the activity on the environment.

Consideration

Submission 201, Further Submissions F329 (point 1), F338, F365 (point 1), F391, F435 (point 1).

Submitter 201, opposed by the further submitters, sought that specific provisions should be introduced into Chapter 3 to guide consent authorities on the appropriate duration of resource consents to discharge contaminants to air. Currently, 'Chapter 1: Overview' contains matters (Section 1.3.5 Resource consent duration) that consent authorities are to have particular regard to in determining appropriate resource consent duration.

There are three issues to be considered in relation to this submission:

1. Are the matters specified *intra vires*; if so
2. Do the changes sought 'add to' the matters in section 1.3.5; and if so
3. Whether, having regard to their efficiency and effectiveness, the provisions sought (policy and method) are the most appropriate means of achieving Objective AQL1?

The issue of *vires* has already been commented on by the Commissioners in a broad sense – see Chapter 1, section 1.3.5 – Resource Consent Duration p 1-31 The Commissioners set out their general understanding of the position, and noted in dealing with individual submissions that they did not consider it appropriate to fetter a consent authority's discretion. The wording of the new policy and method sought makes it clear that a consent authority is to be 'guided by' as opposed to 'bound by'. As a result there would be no 'fettering' as such.

The provisions sought are more specific than those found in Section 1.3.5 in that the guidance given is based on specific air quality conditions and level of discharge resulting in a numerical expression of possible consent duration. Nevertheless, what is sought contains a judgment between the nature and sensitivity of the receiving air, and the nature of the activity. The provisions sought are not *ultra vires*.

Nevertheless in the Commissioners' view the changes sought go beyond section 1.3.5 and they are inappropriate. Objective AQL1 relates to 'localised air quality'. However, the Table 1 uses 'ambient air quality' as a determinant. There will be situations where the local and wider ambient air quality effects of an activity are different. The connection between the new provisions and Objective AQL1 is weak. Further, beyond what is implied in the provisions sought, no reasoning is provided for how the durations were developed for the differing ambient air quality categories and the level of air discharges from the potential various activities. This is critical as part of the justification of the method in terms of Objective AQL1. In the Commissioners' view the changes sought are inappropriate.

No change is recommended by the Commissioners, and it is recommended that submission 201 is rejected. Those in opposition are recommended for acceptance.

Submission 239 (points 1 and 2)

The substance of submission 239(point 1) is considered in relation to Issue AQL1 Localised air quality issues ## 03-007 01 00, 239 and in ## 01-012 22 00, 239. That consideration is adopted. The recommendation is the same, that no change be made and the submission be rejected.

With respect to submission 239(point 2), Objective AQL1 is opposed by the submitter as Rule AQL57 flows from it. No specific wording changes were sought to the objective. It is understood the issue relates to radio frequency fields. Further clarity is not in the Commissioners' view required in Objective AQL 1. No change is recommended by the Commissioners, and it is recommended that the submission is rejected.

Submission 347

Objective AQL1 applies to all areas of Canterbury as discharges to air can create localised air quality issues in both less populated rural areas and more densely populated urban areas. What is being referred to is the localised air quality effects that Chapter 3 is seeking to manage. The actual mechanisms to manage these effects follow in the policies and methods (including rules in some cases). The consideration above (see Chapter 3 - General Submissions ## 03-000 00 00, 155) is also relevant and is adopted. No change is recommended by the Commissioners, and it is recommended that the submission is rejected.

Submission 434, 435, Further Submission F135

The criteria for assessing offensive and objectionable odours are set out in Appendix AQL5. No change is recommended in response to these submissions, and it is recommended that they are rejected.

Submission 338(point 1), 371(point 1), 374(point 1), F347(points 1 and 4), F365(points 2 and 3), F435 (point 2)

The term "localised adverse effects" is defined in the plan as notified as "adverse effects of air pollution which occur within the immediate vicinity of contaminant discharges from one (or more) source(s)". The Commissioners have recommended that Environment Canterbury consider notifying a variation to amend this definition in ## 01-019 33 00, 338, 370, 371, 372, 374, 379 and F347, F365 (points 1-6) and F435. The 'Explanation and principal reasons' for Objective AQL1 distinguish between 'localised effects' and 'ambient air quality'. Because of differences in the spatial extent of effects caused by discharges of varying scale and nature, it is not possible to define a suitable separation distance between emission sources that would be relevant to all circumstances. Further, clarification is not in the Commissioners' view required. No change is recommended by the Commissioners, and it is recommended that the submissions are rejected.

Submission 371(point 2),

The submitter sought that the objective be reworded to 'Ensure that' there were no adverse effects on the environment. The objective as notified is worded 'Localised contaminant discharges to air do not' etc, which describes the future state that the objective is hoping to achieve. The Commissioners prefer the wording in Chapter 3 as notified, as it is appropriate for defining an objective. They recommend that the submission is rejected and no change is required.

Submission 338(point 2), 374(point 2)

The submitters sought that the term ‘in combination’ in Objective AQL1 be clarified. This term is used in Objective AQL1. It is also used in the Act – see e.g. sections 3(d) and it is an ordinary English word. Further clarification is not required. No change is recommended by the Commissioners and it is recommended that submission are rejected.

Submission 338(point 3), 374(point 3), 378, 401, F347(point 3), F435(point 3)

Clarification of the criteria for determining significant adverse effects is requested (338(point 3), 374(point 3), F435(point 3)). It is also suggested that the policies resulting from Objective AQL1 should be amended to refer to ‘significant’, in order to be consistent with the objective (378, 401, F347(point 3)). The submissions seeking clarification of the term ‘significant’ have not specified any wording or definitions.

The plan notes various ‘significant adverse effects’ through its policies (see Policies AQL1 to 8) and rules. The activity status of any discharge is relevant. For those discharges requiring resource consent, Chapter 3 provides guidance to applicants, submitters and decision makers in the policies (AQL1 through 8) that follow Objective AQL 1, the reservation of control over controlled activities, Section 3.4 (Information to be provided with resource consent applications), and in a number of the Appendices. It is not appropriate to further define the term ‘significant adverse effects’. A judgement will be required in each case. The consent process is the appropriate instrument to allow those judgments to be made (in the context of the Plan and the RMA) on this matter, given the wide variety of discharges affecting local air quality covered by Objective AQL 1 and the numerous variations in local receiving environments. No change is recommended by the Commissioners, and it is recommended that the submission be rejected.

Submission 89, 275, Further Submission F329 (point 2)

The submitters support Objective AQL1. Given the Commissioners’ other recommendations these submissions are recommended for acceptance.

Submission 137

The submitter supports Objective AQL1 and wishes that it to be retained. This submission is recommended for acceptance by the Commissioners.

Recommendations

Reject

Submissions 201, 239 (points 1 and 2), 338(points 1, 2 and 3), 347, 371(points 1 and 2), 374(points 1, 2 and 3), 378, 401, 434, 435 and Further Submission F135, F347 (points 1,2,3 and 4), F365 (points 2 and 3), F435 (points 2 and 3).

Accept

Submissions 89, 137, 275 and Further Submission F329 (points 1and 2), F338, F365 (point 1), F391, F435 (point 1)

Amendment Required

None required.

Objective AQL1 (a) ## 03-007 22 00

338	Transit New Zealand, Christchurch	Clarify the 'loss of air's taonga'. Or delete Objective AQL 1.
F386	Te Runanga O Ngai Tahu and Canterbury Runanga	Oppose submission 338

ConsiderationSubmission 338, Further Submission F386

Submitter 338, opposed by further submitter 386, sought that Objective AQL1(a) (“*adverse effects on Tangata Whenua from the loss of air’s taonga...*”) be clarified or that the objective be deleted.

The ‘explanation and principal reasons’ for Objective AQL1 (in part) states: “*Objective AQL1(a) recognises that good air quality is also of significance to Tangata Whenua because of the interrelationship of air with other resources such as water, flora and fauna, and its life-supporting capacity. To Tangata Whenua, air is a taonga.*”

In ‘Chapter 2: Ngai Tahu and the management of natural resources’, ‘Table TGW2-1: Issues and outcomes sought by Tangata Whenua’, the issues and outcomes sought by Tangata Whenua were identified. With respect to air this table is as follows:

ISSUES	OUTCOMES SOUGHT
Air	
<i>The purity of air is maintained (addressed under: Chapter 3 – Objective AQL1)</i>	<i>The spiritual aesthetic nature of air is protected</i>
<i>The drift of contaminants over waterways (addressed under: Chapter 3 – Objective AQL1)</i>	<i>Waterways and the life supported by them are healthy</i>
<i>Health impacts from contaminants in air (addressed under: Chapter 3 – Objectives AQL1, AQL2 and AQL3)</i>	<i>Air is healthy for humans, animals and plants</i>
<i>The visual impacts of contaminants in the air (addressed under: Chapter 3 – Objective AQL1)</i>	<i>Culturally important landmarks are not obscured by visual contaminants in the air</i>

Objective AQL1 is important in addressing the four issues identified. Of these four issues; water is the subject of Objective AQL1(g), health is the subject to Objective AQL1(b) and (f), and visibility the subject of Objective AQL1(d). ‘Spiritual aesthetic nature of air’ is the only matter not specifically referred to. From the issue statement, it can be seen that this is associated with the air’s purity. The matters in Objective AQL1(b) to (g) all combine to support this outcome.

Clarification of Objective AQL1(a) so that it reads that ‘air’ is a ‘taonga’, rather than ‘taonga’ being a component of air is supported. Further, the reference to ‘adverse effects’ and ‘loss’ is not necessary given that ‘significant adverse effects’ is referred to in Objective AQL1. The following wording is considered appropriate by the Commissioners:

“(a) ~~adverse effects on Tangata Whenua from the loss of air’s~~ as a taonga to Tangata Whenua...”

Finally, clarification of the ‘explanation and principal reason’ is also supported to more specifically refer to the issues and outcomes identified by Tangata Whenua. The following wording is recommended by the Commissioners:

“To Tangata Whenua, air is a taonga. Objective AQL1(a) recognises that good air quality is also of significance to Tangata Whenua because of the interrelationship of air with other resources such as water, flora and fauna, and its life-supporting capacity. To Tangata Whenua, air is a taonga. In particular; the purity of air is an important component of its spiritual aesthetic value to Tangata Whenua, good visibility is important so that culturally important landmarks are not obscured, and the life-supporting capacity of air is important to avoid adverse effects on waterways, and human and ecosystem health.”

However no submitter sought this change. There is no scope to make the same. Environment Canterbury should notify a variation dealing with this matter.

Recommendations

Reject

Further Submission F386.

Accept in part

Submission 338.

Amendment Required

1. Amend Objective AQL1(a), p. 3-7 as follows:

“Localised contaminant discharges into air do not, either on their own or in combination with other discharges, result in significant adverse effects on the environment, including:

(a) ~~adverse effects on Tangata Whenua from the loss of air's~~ as a taonga to Tangata Whenua..."

2. Environment Canterbury should consider notifying a variation to the Objective AQL1, 'Explanation and principal reasons', paragraph 2 as follows or in similar terms:

"To Tangata Whenua, air is a taonga. Objective AQL1(a) recognises that good air quality is also of significance to Tangata Whenua because of the interrelationship of air with other resources such as water, flora and fauna, and its life-supporting capacity. To Tangata Whenua, air is a taonga. In particular; the purity of air is an important component of its spiritual aesthetic value to Tangata Whenua, good visibility is important so that culturally important landmarks are not obscured, and the life-supporting capacity of air is important to avoid adverse effects on waterways, and human and ecosystem health."

Objective AQL1 (g) ## 03-007 30 00

427	BP Oil New Zealand Ltd, Shell NZ Ltd, Mobil Oil NZ Ltd & Caltex NZ Ltd	Delete Objective AQL 1 (g). Make any consequential amendments to the plan where necessary.
F386	Te Runanga O Ngai Tahu and Canterbury Runanga	Oppose submission 427: Delete Objective AQL 1 (g). Make any consequential amendments to the plan where necessary.

Consideration

Submission 427, Further Submission F386

This substance of this submission is considered by the Commissioners in Chapter 3 - General Submissions ## 03-000 00 00, 427, 428. The consideration is relevant and it is adopted. With respect to Objective AQL1(g) the Commissioners' recommendation is the same, that no change is necessary. In this context they recommend that the primary submission is rejected and that the submission in opposition is accepted.

Recommendations

Reject

Submission 427.

Accept

Further Submission F386.

Amendment Required

None required.

Explanation and principal reasons - Paragraph 1 ## 03-007 33 00 - 03-007 34 00

347	Federated Farmers Of New Zealand Inc, North Canterbury Branch	Delete references to odour, particles, smoke and dust' from Objectives (refer 3-1-21 above.)
379	Christchurch City Council, Civic Offices	Clarify the comment 'effects on the region's ambient air quality', whether it is the median levels of contaminants over the whole of Canterbury or some other measure. Clarify how the individual 'local' discharges do not add to the general ambient air quality load.
F365	Meridian Energy Limited	Support submission 379:

Submission ClarificationSubmission 347

This relief sought in this submission is: *“Delete all references in Objectives, Policies and Methods, which deal with nuisance effects of odour, particles, smoke and dust.”* ‘Nuisance’ is a different (and lower) threshold to ‘offensive or objectionable’. It is not clear whether the submission is relevant to Objective AQL1(c) and the associated explanation and principal reason.

ConsiderationSubmission 347

The substance of this submission is considered in Section 3.1.2 Localised air quality issues ## 03-001 21 00 - 03-001 26 00, 347, F435. The consideration is relevant and is adopted. The Commissioners’ recommendation is the same, that no change be made, and that the submission is rejected.

Submission 379, Further Submission F365

Submitter 379, supported by the further submitter, generally supports the objective but considers that it is not clear.

The issue raised is the distinction between ‘ambient air quality’ and ‘localised effects of discharge’. ‘Ambient air quality’ and ‘localised adverse effects’ are defined in Chapter 1 of the NRRP:

The definitions are the subject of recommendation by the Commissioners, and they consider that if accepted, their recommendations will assist in clarifying the distinction between Objective AQL1 and Objectives AQL2 and 3.

The policies and methods that flow from Objective AQL1 help further define the matters of concern in relation to ‘localised’ contaminant discharges’. Further, when Issue AQL2 and the resultant provisions are considered, this distinction becomes clearer. No change is recommended by the Commissioners, and it is recommended that the submissions are rejected.

Recommendation

Reject

Submissions 347, 379, Further Submission F365.

Amendment Required

None required.