7 June 2012

Open Letter To:

Commissioner Dame Margaret Bazley

Environment Canterbury (ECAN)

Re: Reinstatement of complying wood burners into rebuilds following the Christchurch earthquakes

It is my belief that there are several very compelling reasons for allowing the reinstatement of complying wood burners into the homes of Christchurch residents affected by the recent earthquakes. (Please note that my opinions are personal and do not represent those of the CDHB.)

I understand and support ECAN's mandate to improve air quality in Canterbury but this needs to be seen in context with the wider needs of the community and the current situation in which we see ourselves. Also science is always evolving and ECAN's position must allow for new evidence to be examined without prejudice.

In brief:

- 1. Legal: ECAN should not be entitled to interfere with the right of the client to reinstatement of their home or similar as is allowed per their insurance contract
- 2. Moral: ECAN should not take advantage of Christchurch residents at a time when they are most in need. Had the earthquakes not occurred ECAN would not have been able to require removal of these wood burners. Replacement would ensure that these residents would now be using complying wood burners with very low emissions which should be enough of an advantage to ECAN in these trying times
- 3. Choice: With very low / no emitting wood burners now currently available there is no longer a credible argument for removing complying wood burners as a heating option.
- 4. **Financial:** The cost of wood has remained stable in recent years while gas and power continues to increase. We live in a low wage economy, some elderly folk and those on low wages are frequently turning off their electrical heating as they cannot afford the power. The use of risky interior gas heaters is increasing as they are seen as the only cheaper alternative. One resident wrote to me "There will be many oldies, without power, no friendly fire, putting another jersey on and shivering a bit harder to keep warm today because of ECan's policy"
- 5. Science: The science behind ECAN's stance on wood burners no longer stacks up.

 Meeting P10 standards by removing log burners in Christchurch will not improve the health of Cantabrians. As emissions from home heating have decreased, deaths from respiratory disease have not decreased.

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Reductions in PM10 concentrations have not been accompanied by decreased hospital admissions for respiratory complaints.

During the past ten years or so, concentrations of PM10 have been reduced by replacing log burners and open fires with heat pumps.

Death rates from respiratory disease have not been reduced. 'In the 2007 Health and Air Pollution in New Zealand (HAPiNZ) report it was assumed that PM10 from home fires has the same toxicity as PM10 from traffic. However, in the earlier 2005 HAPiNZ report it was found that summer time PM10, which comes largely from traffic, was 5 to 10 times as toxic as winter time PM10, 80% of which comes from home fires. The algebra leads to the conclusion that PM10 from home fires is relatively harmless.

Palmer P, Mann J D, 2011. How toxic are fine particles emitted from home fires in Christchurch, New Zealand. N Z M J;124: 1330.

The "Home heating and air quality report, a public health perspective" report cites Hales et al as authors of a study on hospital admissions for respiratory disease related to daily variations in PM10 concentrations in Christchurch. But as the concentrations of PM10 declined over the years of the study, the number of admissions almost doubled, thus giving no credence to the conclusion that reducing the concentration of PM10 would reduce the incidence of admissions for respiratory disease.

Palmer P. 2002 Particulate air pollution and hospital admissions: consequent or subsequent. Aust N Z J Public Health26;279-280.

There is considerable personal and financial stress in our community as we seek recovery and although it is my view that ECAN should review it's policy regarding P10's and wood burners in general it is even more urgent that ECAN refrains from its current stance, taking advantage of our exceptional circumstances, and allows people to rebuild their lives and their homes including the reinstatement of their preferred heating option.

Sincerely yours,

Wendy V Gilchrist

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