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14 December 2021

Dear Ministers,

I have just had the opportunity to read *Our air 2021* – the most recent domain report produced under the Environmental Reporting Act 2015.

As the report makes clear, the recently released 2021 World Health Organisation (WHO) air quality guidelines are more stringent for most critical air pollutants and reflect the overwhelming evidence of the impacts to human health, even at low levels. Critically, they set a much lower threshold for air pollutants than the previous WHO air quality guidelines published in 2005, and the current New Zealand regulations – Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (NES-AQ).

I note that in 2015 my predecessor, Dr Jan Wright, called for a review of how particulate matter is managed in New Zealand. She pointed out that the smaller airborne particles are, the greater the risk they pose to those who inhale them. Further, the health impacts of long-term exposure to particulates are much greater at a population level than the impacts of short-term exposure. However, New Zealand's limit on particulates in ambient air has been based on short-term exposure to PM₁₀, as opposed to long-term exposure to PM_{2.5}.¹

Further, in my commentary on *Our air 2018*, I recommended bringing our national standards for PM_{2.5}, nitrogen dioxide and sulphur dioxide in line with international guidelines.²

While I'm pleased that in early 2020 the Government consulted on several amendments to the NES-AQ, including particulate matter standards, no amendments to the NES-AQ have been made yet.

Given that the 2021 WHO air quality guidelines set much lower thresholds for air pollutants reflecting the overwhelming evidence of their impacts on human health, there should be no further delay in bringing New Zealand's air quality standards into line with the international guidelines.

I look forward to seeing proposed amendments to the NES-AQ in the near future.

Yours sincerely

Rt Hon Simon Upton

Parliamentary Commissioner for the Environment

¹ PCE, 2015. The state of air quality in New Zealand: Commentary by the Parliamentary Commissioner for the Environment on the *2014 Air Domain Report*, pp.51-52.

² PCE, 2019. Commentary on *Our air 2018*. Letter to Vicky Robertson and Liz MacPherson.