

**Hon David Parker**  
Minister for the Environment

**Hon Peeni Henare**  
Associate Minister for the Environment



**22 AUG 2023**

Simon Upton  
Parliamentary Commissioner for the Environment  
PO Box 10 241  
Wellington 6140

Tēnā koe Simon,

Thank you for your letter of 22 May 2023 to Minister for the Environment, Hon David Parker, regarding volatile organic compounds (VOCs) and the priority given to air quality issues. Associate Minister for the Environment, Hon Peeni Henare, is also responding to your letter as he has delegated responsibility for policy development and other matters relating to air quality, including matters relating to the National Environmental Standards for Air Quality (NES-AQ).

The Government is committed to improving air quality in Aotearoa New Zealand and is presently focused upon delivering reform of the resource management system. Officials are redrafting aspects of the NES-AQ into the new National Planning Framework (NPF).

The NPF will contain direction on limits and targets in relation to ecological integrity and human health. Poor air quality is primarily a human health concern and so officials from the Ministry for the Environment (MfE) and the Ministry of Health will be working together to develop limits and targets for fine particulate matter (PM<sub>2.5</sub>).

As you will be aware, the proposed amendments to the NES-AQ consulted upon in 2020 are no longer in line with the updated World Health Organization (WHO) global air quality guidelines. Likewise, other ambient air quality standards (e.g., CO, NO<sub>2</sub>, O<sub>3</sub>, SO<sub>2</sub>) in the NES-AQ are now also out of date.

Further analysis is needed to understand the implications of adopting the new WHO guidelines in Aotearoa New Zealand. Once complete, that analysis will be used to inform updates to these standards in the second iteration of the NPF.

The NES-AQ will remain the primary regulatory tool for managing air quality during the transition to the new Natural and Built Environment (NBE) plans. Given the length of that transition, officials are considering updates to the NES-AQ alongside the second iteration of the NPF, which will require limits and targets to be set for a range of air attributes.

A small number of VOCs (e.g., Acetaldehyde, Benzene, 1, 3 Butadiene, Formaldehyde) are included in MfE's Ambient Air Quality Guidelines (2002), but we note that the updated WHO guidelines do not suggest changes to levels for these or other VOCs. As with the NES-AQ standards, further research is needed to understand what guidelines are appropriate for New Zealand and how they will fit into the new resource management system.

The monitoring and compliance of air quality issues is undertaken by regional councils with some variance based on available funding. Officials will look to continue to support regional councils with implementation and best practice advice. MfE has two documents that include guidance on mitigation for VOC discharges to air, specifically the *Good Practice Guide for Assessing Discharges to Air from Industry* (2016) and the *Good Practice Guide for Assessing and Managing Odour* (2016).

As you have noted, Agrecovery has taken steps to address the issue in Fairlie and prevent future problems occurring elsewhere in the country. This voluntary product stewardship scheme will be replaced with a regulated scheme under the Waste Minimisation Act 2008 and MfE will use that opportunity to ensure appropriate controls are in place. Public consultation on those regulations is expected to commence in 2024.

We appreciate you taking the time to investigate this matter and your continued advice on ways to improve air quality management in Aotearoa New Zealand.

Nā māua noa, nā,



Hon David Parker  
**Minister for the Environment**



Hon Peeni Henare  
**Associate Minister for the Environment**