

Review of the Canterbury Regional Policy Statement: Hazardous Substances

Purpose

The purpose of this paper is to discuss options on the approach to be used to review the hazardous substance provisions (Chapters 17 and 18) of the Canterbury Regional Policy Statement (CRPS). The paper brings together the current thinking on the review of these CRPS provisions. It outlines the options and preliminary approaches to be used in the review. Views are being sought on possible policy approaches prior to undertaking detailed analysis or drafting specific wording.

Background

Hazardous substances are generally accepted as being a part of everyday life. They are used in manufacturing (glues), agriculture (pesticides), infrastructure provision and maintenance (road paint) and around the home (cleaning solvents). Hazardous substances can be in the form of liquid (battery acid), gas (Liquid Petroleum Gas), or solid (swimming pool chlorine tablets).

The prevalent nature of hazardous substances means that there is plenty of opportunity for these substances to enter the environment, either wilfully or accidentally, causing contamination that can be difficult to clean up. Sound management practices need to be applied to ensure any adverse effects caused by hazardous substances are avoided or mitigated.

The Resource Management Act 1991(RMA) requires that a regional policy statement must state the local authority responsible in the whole or any part of the region for specifying the objectives, policies and methods for the control of the use of land to prevent or mitigate the adverse effects of the storage, use, disposal or transportation of hazardous substances¹. Pursuant to this, both the regional council and the territorial authorities (TAs) within the Canterbury region have functions for the management of hazardous substances.

Other agencies also have responsibilities in controlling hazardous substances; these include the Environmental Risk Management Agency (ERMA), public health authorities and the Ministry of Transport.

The current policies relating to the management of hazardous substances are split across two chapters of the CRPS. Chapter 17 seeks to prevent or mitigate the adverse effects of hazardous substances, including reducing use where practicable, while Chapter 18 deals with the disposal of waste hazardous substances.

Since the CRPS became operative, the context within which Chapter 17 was prepared has changed considerably. At the national level:

1. The Hazardous Substances and New Organisms Act 1996 (HSNO) came into full effect in 2006 with the re-classification of all known hazardous substances in New Zealand complete
2. The introduction of a National Strategy for Improving the Workability of Hazardous Substance Provisions of the Hazardous Substances and New Organisms Act²

¹ Resource Management Act 1991 Section 62(i)(ii)

² National Strategy for Improving the Workability of Hazardous Substance Provisions of the Hazardous Substances and New Organisms Act – 2006 – Ministry for the Environment

Within Canterbury:

1. The Canterbury Hazardous Waste Management Strategy³ has been developed by Environment Canterbury and TAs – this has improved region wide integration of hazardous substance management, particularly with regard to disposal.

CRPS Provisions and the Effectiveness of these

Chapter 17 seeks to avoid or mitigate the adverse effects that can occur as a result of the transportation, storage, use and disposal of hazardous substances. The provisions for this include the delineation of responsibility between the regional council and TAs as well as specific provision for the promotion of good practice and the reduction of hazardous substances, the prevention of unintended release of hazardous substances and the discharge of hazardous substances.

It is unclear as to how effective the CRPS has been in reducing the adverse effects of hazardous substances on the environment. From data regarding the number of resource consents granted for the discharge of hazardous substances to air, water and land, it seems that the amount of hazardous substance discharge has decreased since 1998. This trend may not be accurate however as part of this drop in consent numbers is due to a Plan Change making the storage of hazardous substances a permitted activity.

The efficiency and effectiveness report⁴ has identified issues to be looked at in the review process. These issues are:

1. Issue 1 in the current CRPS is too detailed and therefore tends to miss important matters such as risk to the unconfined aquifer from hazardous substances.
2. The lack of integration of hazardous substance management, across organisations and between different legislation.
3. Delineation of Regional Council and TA responsibilities need to be clear. The attempted delineation has created significant areas of overlap and potential gaps between regional and district or city plans. For example, while all TAs have policies and objectives regarding the control of hazardous substances, some issues (such as transport) are not specifically dealt with within all District or City Plans, and it is considered that responsibility needs to be clarified in these instances. The demarcation of responsibilities as set out in the current CRPS has not been achieved in practice.
4. The current “substance focused” approach creates instances where a single activity may require two resource consents (i.e. a process that uses a chemical controlled by ECan and a chemical controlled by the TA). In addition, substances may “fall between the gaps” if not identified in either the CRPS or a district / city plan.

Tonkin Taylor produced a report for ECan outlining the responsibilities of the Regional Council for the management of hazardous substances⁵. The report provides suggestions for improving the effectiveness of the CRPS provisions. These suggestions are:

1. The definition of “hazardous substances” needs to be reviewed as it may be too narrow.
2. Specific problems with the management of hazardous substances in the region need to be stated so that the necessity, appropriateness and adequacy of the policies and methods can be addressed.
3. Responsibilities need to be clarified (as above).
4. Several policies and methods need to be rewritten in order to avoid confusion.
5. The roles of ERMA and the HSNO Act need greater recognition.

³ Canterbury Hazardous Waste Management Strategy – 2006 – Environment Canterbury et al

⁴ Our Changing Environment – An evaluation of the 1998 Regional Policy Statement - 2007

⁵ Review of Regional Council responsibilities for managing environmental impacts of hazardous substances – 2000 – Tonkin Taylor

Regarding other specific provisions, Policy 2, which promotes hazardous substance management that prevents or mitigates adverse effects on the environment, has been somewhat effective. Similar policies appear in District and City Plans throughout the region and in addition, a Hazardous Waste Management Strategy⁶ has been written by and adopted by the Regional and District Councils.

Policy 3, which focuses on the prevention or mitigation of adverse effects of hazardous substances caused by unintentional releases, is considered effective as most TAs have adopted this policy.

Policy 4 relates to the discharge of hazardous substances and states that discharge *should* only be authorised when adverse effects are prevented or mitigated. The effectiveness and efficiency of this policy has been difficult to quantify.

The current provisions do not recognise the relationship between hazardous substances and natural hazard risk management. Where a hazardous substance is stored in an area susceptible to damage from natural hazards such as flooding, earthquake or tsunami, the risks surrounding those hazardous substances increase.

Overall, it is considered that the current provisions of the CRPS have not been efficient or effective and it is clear that review of all provisions is needed.

Policy options and discussion

Policy 1

Policy 1 is the key policy for the delineation of responsibility between ECan and TAs. ECan's responsibility includes the co-ordination and integration of the management of hazardous substances as well as the prevention of adverse effects to water or coastal water caused by certain listed hazardous substances. ECan also retains responsibility for hazardous substances within the Coastal Marine Area. TAs responsibilities are for the prevention or mitigation of adverse effects of hazardous substances not specified as ECan's responsibility.

As indicated above Policy 1 has not been fully implemented. There are two issues with Policy 1 which need to be addressed. The first is the delineation of responsibility between TAs and ECan. While the current CRPS provisions seem to be clear, there are complexities within the provisions that have led to misunderstanding for both ECan and the TAs. As a result of this, ECan and most TAs have failed to address all of their responsibilities within their Plans (e.g. most TA plans have a limited list of hazardous substances to which their policies, objectives and rules apply; these plans should however address all hazardous substances not specifically controlled by ECan. In addition, ECan have not developed specific rules to deal with the substances for which they have assumed responsibility). The policy needs to be clear as to what responsibility lies with what agency.

The second issue that needs to be addressed with Policy 1 is the "substance focus". Policy 1 delineates responsibility primarily by substance. This has proven to be too complex to put into practice by either ECan or the TAs and as a result, some controls have fallen through the gaps causing groundwater and soil to become compromised. In addition, there are potential inefficiencies in the management of hazardous substances, particularly when a single activity uses a substance that is controlled by ECan and a substance controlled by the TA.

There are two potential solutions to this problem. The first option is to include a clause within Policy 1 which states that if one or more of the substances for which ECan retain responsibility for are used in an activity or process, ECan will resume responsibility for all hazardous substances used in that activity for the purposes of the resource consent process. This solution will prevent the need for an applicant to acquire two resource consents for the one activity. It is also considered that this option will result in a less complex policy framework.

⁶ Canterbury Hazardous Waste Management Strategy – 2006 – Environment Canterbury et al

The second option is considered to be a more simple and efficient way of delineating responsibility and will avoid any double up of consent or policy requirements. This option involves restructuring Policy 1 to make it “activity focused” rather than “substance focused”. For example, the policy could read as follows:

The Regional Council shall develop objectives, policies and rules relating to the control of the use of land for the purpose of:

- *Preventing or mitigating adverse effects of the use, storage, disposal or transportation of hazardous substances associated with the following activities:*
 - *The transport of hazardous substances on, over or through water (water bodies and coastal water)*
 - *The transport of hazardous substances over land*
 - *The direct discharge of hazardous substances to land, air or water*
 - *[...]*
- *Territorial Authorities shall develop objectives, policies and rules relating to the control of the use of land for the purpose of:*
 - *The reasonably expected use of hazardous substances in relation to land use activities*
 - *Storage of hazardous substances*
 - *Disposal of hazardous substances and hazardous wastes*
 - *[...]*

It is clear that the wording of such a policy would need to be carefully considered in order to ensure there are no gaps.

This policy option is a large shift from the current provisions and would likely necessitate Plan Changes for all Districts. It is noted that the Auckland, Waikato, Greater Wellington, Northland, Southland and West Coast regional councils have all taken the activity based approach. Some have also delineated responsibility by location (i.e. either inside or outside of the Coastal Marine Area)

Such a shift would reduce complexity and make it simpler for ECan and TAs alike to give effect to the CRPS. Delineation by activity would prevent any cross over and would also prevent controls falling through the gaps.

It is considered that the outcome of such a shift will be a more efficient and effective policy framework and consequently, more efficient and effective management of hazardous substances region wide. Overall this second option is preferred.

Policy 2

As indicated above, Policy 2, which promotes hazardous substance management which prevents or mitigates adverse effects on the environment (including practices that reduce the use of hazardous substances) has been partially effective.

Policy 2 could remain as is, however it could be made more effective by splitting its coverage of safe use and hazardous substance use reduction. It is considered that these issues could be dealt with more effectively if the policy was split into two parts. In doing this, more weight would be given to each of the issues and the efficiency and effectiveness of a split policy would be easier to quantify.

The two policies could be worded as follows:

Policy [2]

Promote hazardous substances management practices that prevent or mitigate adverse effects on the environment, incorporating, where practicable, best practice standards.

Policy [3]

Promote practices that reduce the use of hazardous substances including, where practicable, substitution of hazardous substances with non hazardous substances.

Policy 3

As indicated above, Policy 3, which focuses on the prevention or mitigation of adverse effects of hazardous substances caused by unintentional releases, has been effective. It is noted that the methods for achieving this policy do not include the adoption of emergency response plans and this may need to be considered.

Policy 4

As indicated above, the effectiveness and efficiency of Policy 4, which relates to the discharge of hazardous substances and states that discharge *should* only be authorised when adverse effects are prevented or mitigated, has been difficult to quantify. The policy could be made more effective if the term “should” is replaced with “shall”.

Options for new policies

Hazardous substances and hazardous waste coverage is currently split between two chapters (17 & 18). It is considered that all hazardous substances, be they unused or spent, should be covered in the same chapter. This is in keeping with the cradle to grave management approach and is one that has been adopted in the Canterbury Hazardous Waste Management Strategy. This proposal is covered and supported in the issues paper dealing with Waste Management provisions.

Given the RMA requirement for TAs to “give effect” to the CRPS, the following policy may be appropriate:

Waste hazardous substances shall be disposed of in a manner which safeguards against potential adverse environmental effects and in accordance with the Canterbury Hazardous Waste Management Strategy

The wording of such a policy will have to be carefully considered. Reference to a specific document is not ideal as the policy (or rather the reference within the policy) will need to be changed (by way of Plan Change) if the referred to document is ever revised.

Finally, a new policy could be put in place that recognises the relationship between natural hazard risk management and hazardous substance use, storage, transport and disposal. This policy would highlight the additional roles where natural hazards and hazardous substances coincide.

Summary of Policy Options

The policy options discussed are not mutually exclusive and as such can be summarised as follows:

General:

1. Maintain the current policy approach but clarify wording to ensure clarity in the delineation of responsibilities between the territorial authorities and Environment Canterbury; *and*
2. Update current policies to ensure new legislation considered; *and*
3. Add a new policy which deals with the disposal of waste hazardous substances; *and*
4. Add a new policy that recognises the relationship between hazardous substances and natural hazard risk management

Policy 1:

5. Make clear that TAs have responsibility for any hazardous substance which is not specifically controlled by ECan; *and*
6. Update the list of hazardous substances under Policy 1(a) (ii) of Chapter 17 to include any hazardous substances not identified in 1998 and/or any additional substances to which ECan wished to maintain responsibility for; *and*
7. In order to avoid instances where a single activity may require two resource consents, the policy can be written such that if a process involves one substance which ECan are responsible for, ECan will assume responsibility (and require resource consent) for other substances used in the process; *or*
8. Rewrite Policy 1 so that responsibility for the control of hazardous substances is delineated between ECan and TAs by the activity rather than the substance.

Policy 2:

9. Retain Policy 2 as is; *or*
10. Split Policy 2 into two policies, giving best practice for the handling of hazardous substances and the reduction in the amount of hazardous substances used their own policies and objectives; *and*

Policy 3:

11. Rewrite Policy 3 so that it more clearly states what is expected of TAs. In addition, an implementation method should be included that relays an expectation that emergency response plans need to be prepared and adopted; *and*

Policy 4

12. Rewrite Policy 4 so that it is more prescriptive, using the word *shall* rather than *should*.

Concluding comments

Given the findings of this paper in relation to the effectiveness and efficiency of the current CRPS provisions for the management of hazardous substances, it is considered that there need to be some changes to the current CRPS provisions relating to the transport, storage, use and disposal of hazardous substances.

The changes need to clarify the roles that TAs and ECan will take in the management of hazardous substances. Integration of this management needs to be a key consideration.

Appendix 1: Statutory context

Hazardous substances are primarily dealt with under two pieces of legislation in New Zealand. The Hazardous Substances and New Organisms Act 1996 (HSNO) sets national controls that recognise the inherent hazard of certain substances⁷ while the RMA provides the vehicle by which local authorities can set controls that recognise the particular sensitivities of their local environment.

In addition, the Canterbury Regional Council also has functions under the Maritime Transport Act 1994 (MTA) relating to transport of hazardous substance within the Coastal marine Area. These functions relate primarily to marine oil spills.

Local authorities may, pursuant to the RMA, set restrictions on hazardous substances which are stronger than the controls set by HSNO or National Environmental Standards set by the Environmental Risk Management Authority (ERMA) pursuant to the HSNO Act, but may not set any lesser controls.

The RMA requires that a Regional Policy Statement must state the local authority responsible in the whole or any part of the region for specifying the objectives, policies and methods for the control of the use of land to prevent or mitigate the adverse effects of the storage, use, disposal or transportation of hazardous substances⁸.

The 2005 amendments to the RMA include a new regional council function, to investigate land for the purposes of identifying and monitoring contaminated land⁹. A new definition of 'contaminated land' has also been included in the Act since the CRPS was adopted. The current CRPS includes provisions for contaminated land within the soils chapter. These provisions relate to both avoiding the contamination of new areas and the investigation of previously contaminated land.

Since the CRPS was made operative (1998), there have been changes made to the RMA. It is not considered that these changes affect the legislative framework in which hazardous substances are dealt with within the CRPS. It is noted that parts of HSNO have become operative, which were not operative in 1998 and those parts of the Dangerous Goods Act 1974 which were operative in 1998 have consequently been repealed. In particular, controls surrounding the release of new hazardous substances and regulations governing the treatment of hazardous substances for each phase of the substances lifecycle have come into operation since June 2006.

Section 30 of the RMA sets out functions of regional councils in giving effect to the RMA. Those functions relevant to hazardous substance management provisions are set out below:

Section 30(1)(a) gives regional councils the function of establishing, implementing and reviewing the objectives, policies and methods to achieve integrated management of the natural and physical resources of the region.

Section 30(1)(b) gives regional councils the function of preparing objectives and policies in relation to any actual or potential effects of the use, development or protection of land which are of regional significance.

Section 30(1)(c) gives regional councils the function of controlling the use of land for the purpose of soil conservation, maintenance and enhancement of water quality and quantity in water bodies and coastal water, maintenance and enhancement of ecosystems in water bodies and coastal water and the prevention or mitigation of adverse effects of the storage, use transportation or disposal of hazardous substances.

⁷ Acting Together – HSNO and the RMA – A quick reference for councils. (July 2001) – Ministry for the Environment

⁸ Resource Management Act 1991 Section 62(i)(ii)

⁹ Resource Management Act 1991 Section 30(ca)

Section 31 of the RMA sets out the functions of territorial authorities (TAs) in giving effect to the RMA. Those functions relevant to hazardous substance management provisions are set out below:

Section 31(1)(a) gives TAs the function of establishing, implementing and reviewing objectives, policies and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.

Section 31(1)(b) gives TAs the function of controlling any actual or potential effects of the use, development, or protection of land for the purpose of the prevention or mitigation of any adverse effects of the storage, use disposal or transportation of hazardous substances, the maintenance of indigenous biological diversity.

Appendix 2: Review of resource management issues

Issue	Relevance	Significance	Recommendation
<p>Chapter 17 Issue 1</p> <p>Adverse effects on the environment may arise from the storage, use, disposal or transportation of hazardous substances including:</p> <ul style="list-style-type: none"> i. Contamination of air, water and soil ii. Effects on ancestral lands, sites and other taonga of value to Tangata Whenua iii. Effects on ecosystems iv. Human health effects <p>These adverse effects may arise because:</p> <ul style="list-style-type: none"> a) Precautionary measures taken when hazardous substances are stored, used or disposed of are inadequate; b) Spills or leaks can occur when hazardous substances are transported, loaded or unloaded; or c) Activities using hazardous substances as an integral part of their processes, for example agricultural spraying, may make discharges into the environment which have unintended adverse effects. 	<p>Remains relevant. The report: <i>Review of Regional Council responsibilities for managing environmental impacts of hazardous substances</i>¹⁰ indicates that there may be some need to include specific problems so that they can be addressed more directly by policies and methods.</p>	<p>Remains significant. The issue is still a region wide issue</p>	<p>Retain this issue, but broaden it to recognise specific problems.</p>

¹⁰ Review of Regional Council responsibilities for managing environmental impacts of hazardous substances – 2000 – Tonkin Taylor

Appendix 3: Analysis of policy approaches: hazardous substances

Option 1: Maintain the current policy approach but clarify wording to ensure clarity in the delineation of responsibilities between the territorial authorities and Environment Canterbury.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Assists in resolving the issue by clarifying roles 	<ul style="list-style-type: none"> Fails to recognise specific problems (e.g. potential for long term effects similar to those caused by DDT)
Integrated management	<ul style="list-style-type: none"> Will achieve a policy framework through which integrated management can be achieved 	<ul style="list-style-type: none"> While roles will be clarified, leadership will still need to be taken in order to ensure integrated management.
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions under Section 30(1)(c)(v). Also assists TAs in achieving their functions under Section 31(1)(b)(ii) 	
Consultation views		
OVERVIEW	This approach would increase effectiveness and efficiency.	

Option 2: Update current policies to ensure new legislation considered

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Assists in resolving the issue by ensuring integration of policies with legislation. Assures management practices are in line with legislation. 	<ul style="list-style-type: none"> May fall outside the scope of the issue as it currently stands – would resolve issues surrounding specific problems e.g. hazardous substance classification has only recently (2006) become standardised within the HSNO provisions.
Integrated management	<ul style="list-style-type: none"> Ensures integration of policies with legislation. 	<ul style="list-style-type: none"> Leadership will still need to be taken in order to ensure integrated management.
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will ensure efficiency in complying with legislative requirements	

Option 3: Add a new policy which deals with the disposal of waste hazardous substances

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Assists in resolving the issue by ensuring specific attention is given to an area where hazardous substances have greater potential to enter the environment in a manner that could cause adverse effects. 	
Integrated management	<ul style="list-style-type: none"> Ensures integration of hazardous waste management throughout the region. 	<ul style="list-style-type: none"> Requires careful wording to allow for changes in best practice.
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will ensure efficiency in the management of the disposal of waste hazardous substances by providing an over arching tool by which integration of that management can be achieved.	

Option 4: Add a new policy that recognises the relationship between hazardous substances and natural hazard risk management

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Assists in resolution of the issue particularly in respect to avoiding contamination of air, water and soil and avoiding adverse effects to human health. 	
Integrated management	<ul style="list-style-type: none"> Management of hazardous substances will be more integrated with natural hazard risk management. 	
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions 	
Consultation views		
OVERVIEW	This approach will ensure environmental risk factors are taken into account in the management of hazardous substances	

Option 5: Make clear that TAs resume responsibility for any hazardous substance which is not specifically controlled by ECan.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Responsibilities will be more clearly defined and both ECan and TAs will have clear direction on how they will achieve the resolution of the issue 	
Integrated management	<ul style="list-style-type: none"> Will assist in giving clearer direction 	<ul style="list-style-type: none"> Retains separate responsibilities and will be dependant on strong communication between ECan and TAs
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will ensure effectiveness and efficiency is improved	

Option 6: Update list of hazardous substances under Policy 1(a) (ii) of Chapter 17 to include any hazardous substances not identified in 1998 and/or any additional substances to which ECan wishes to maintain responsibility for.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Assists in resolving the issue 	<ul style="list-style-type: none"> May not be the efficient way of resolving the issue. It is considered that controls based on the activity rather than the substance are more efficient
Integrated management		<ul style="list-style-type: none"> Does not assist in the integration of management of hazardous substances but rather, further splits management.
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach is not efficient or effective	

Option 7: In order to avoid instances where a single activity may require two resource consents, the policy can be written such that if a process involves one substance which ECan are responsible for, ECan will assume responsibility (and require resource consent) for other substances used in the process;

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> Assists in resolving the issue 	<ul style="list-style-type: none"> May not be the efficient way of resolving the issue. It is considered that controls based on the activity rather than the substance are more efficient
Integrated management	<ul style="list-style-type: none"> Improves integration as resolves the issue of a doubling up on consent requirements between ECan and TAs. 	
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will improve efficiency	

Option 8: Rewrite Policy 1 so that responsibility for the control of hazardous substances is delineated between ECan and TAs by the activity rather than the substance.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> This is a more efficient approach for resolving the issue 	<ul style="list-style-type: none"> TAs may also have to alter their plans to deal with hazardous substances in a similar way
Integrated management	<ul style="list-style-type: none"> Will improve integration of management by ensuring only one agency needs to be involved in the control of hazardous substances for any given activity 	<ul style="list-style-type: none"> Requires strong buy in from TAs as will probably require Plan Changes
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will ensure effectiveness and efficiency is improved but requires strong TA buy in	

Option 9: Split Policy 2 into two policies, giving best practice for the handling of hazardous substances and the reduction in the amount of hazardous substances used their own policies and objectives.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> This approach will be more effective in resolving the issue 	<ul style="list-style-type: none"> The issue does not focus on specific problems such as the use of hazardous substances where alternatives are available
Integrated management	<ul style="list-style-type: none"> Will clarify management direction 	
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will ensure effectiveness and efficiency is improved but may require a review of the issue	

Option 10: Rewrite Policy 3 so that it more clearly states what is expected of TAs. In addition, an implementation method should be included that relays an expectation that emergency response plans may need to be prepared and adopted.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> This approach will be more effective in resolving the issue 	<ul style="list-style-type: none"> Will again require strong buy in from TAs as well as leadership from ECan
Integrated management	<ul style="list-style-type: none"> Will clarify roles of TAs and ECan 	
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions and assists TAs in carrying out their functions 	
Consultation views		
OVERVIEW	This approach will ensure effectiveness and efficiency is improved but will require strong leadership and buy in	

Option 11: Rewrite Policy 4 so that it is more prescriptive, using the word *shall* rather than *should*.

	For	Against
Purpose of the RMA	<ul style="list-style-type: none"> Assists in achieving the purpose of the RMA 	
Issue resolution	<ul style="list-style-type: none"> This approach will be more prescriptive and therefore more effective in resolving the issue 	<ul style="list-style-type: none"> May result in some resource consent applications being declined
Integrated management		
Carrying out functions	<ul style="list-style-type: none"> Achieves Environment Canterbury's functions 	
Consultation views		
OVERVIEW	This approach will ensure effectiveness but may not improve efficiency.	