

Your feedback is invited

**Feedback Form for the
Review of the National Environment
Protection (Ambient Air Quality) Measure**

Introduction

The National Environment Protection Council is keen to seek your comment on the Review of the National Environment Protection (Ambient Air Quality) Measure (AAQ NEPM).

The overall purpose of the review is to evaluate the performance of the current AAQ NEPM in achieving the desired environmental outcome of *"ambient air quality that allows for the adequate protection of human health and well-being"* and to recommend any required changes to the NEPM.

Written comments are invited by close of business 27 August 2010.



Have your say

All interested government, industry, community-based groups and individuals are invited to make comment on the Review of the Ambient Air Quality NEPM Discussion Paper. Please complete and return the attached form.

Submissions to NEPC

Separate or additional printed or electronic submissions are also encouraged to be made to:

Email to:	CD Rom, or printed to:
kscott@ephc.gov.au	Ms Kerry Scott
	Project Manager
Fax to:	NEPC Service Corporation
(08) 8224 0912	Level 5/81 Flinders Street
	ADELAIDE SA 5000

Comments are invited by close of business 27 August 2010

More information

The discussion paper is available on the EPHC website www.ephc.gov.au.

NEPC Service Corporation
Telephone: (08) 8419 1200
Email: exec@ephc.gov.au
EPHC website www.ephc.gov.au



Your say on the Review of the Ambient Air Quality NEPM

For each of the questions space is provided to give more detailed feedback. To assist with your response a number of questions you may wish to consider have been listed below:

- If yes, what evidence suggests to you that the current standard may no longer be appropriate?
- If no, briefly summarise why you think the current standard is appropriate.

Is there enough evidence to recommend revising the current carbon monoxide standards?

Yes ☒ No ☐

Align to WHO & EU Standards. - i.e. max 8 ppm/8 hrs
- or less.

1. Is there enough evidence to recommend revising the current nitrogen dioxide standards?

Yes ☒ No ☐

Align to WHO & EU Standards/values
(0.097 ppm - 1 hour; 0.019 ppm annual)

2. Is there enough evidence to recommend revising the current ozone standards?

Yes ☒ No ☐

Australia has high exposure rates. Room to
apply stricter controls? Apply 1, 4 & 8 hr standards.

3. Is there enough evidence to recommend revising the current sulfur dioxide standards?

Yes ☒ No ☐

Align to WHO Standard (0.007 ppm/24 hrs)

4. Is there enough evidence to recommend revising the current lead standards?

Yes ☒ No ☐

Stricter control of lead sources.

5. Is there enough evidence to recommend revising the current PM10 standards?

Yes ☒ No ☐

Incorporate annual average $20 \mu\text{g}/\text{m}^3$
applied by WHO.

6. Is there enough evidence to recommend revising the:

6.1. current PM2.5 advisory reporting standards,

Yes No; and / or

6.2. including PM2.5 as a compliance standard with goals?

Yes No

7. Is there enough evidence to recommend including benzene in the AAQ NEPM and establishing a standard?

Yes ☒ No ☐

8. Is there enough evidence to recommend including PAH's in the AAQ NEPM and establishing a standard?

Yes ☒ No ☐

Evaluation of performance

9. Does the current approach, which allows for a number of exceedences of the standard, meet the requirement for adequate protection?

Yes ☐ No ☒

A number of alternatives to the current approach are considered in the Review. Do you support:

10. Assessing compliance with the standard using a percentile form (not stating an allowable number of exceedences)

Yes ☐ No ☐

Undecided. Prefer 'not to be exceeded'
Standard, with an appropriate baseline for optimum
protection of health.

11. Having a 'not to be exceeded' standard based on health protection and requiring reporting of cause of exceedences, progress toward meeting the standards and actions taken

Yes ☒ No ☐

12. Allowing 'exceptional' or 'natural' events (such as bushfires or dust storms) to be excluded from the assessment of whether the air quality in a region is in compliance with the standards or not.

Yes ☒ No ☐

13. Are there alternative methods that are not provided above which offer a better or a more consistent level of health protection? Please detail.

Yes ☒ No ☐

Review of Standards should be accompanied
by stricter enforcement by jurisdictions, and more
streamlined prosecutorial system. There are still
many businesses which operate without regard to
standards, and imposing fines/prosecution is the
only way to get their attention. It's unfortunate,
but this is the reality.

Reporting protocols

14. Should changes be made to the reporting protocols for exceedences?

Yes ☒

No ☐

If this increases knowledge & provides better information to inform a bigger picture.

15. Should states and territories be required to assess and provide clear justification for sources of exceedences?

Yes ☒

No ☐

Definitely. There is room for improvement in the enforcement front.

16. Should states and territories be required to advise the public immediately in the event of an exceedence in addition to annual reporting requirements?

Yes ☒

No ☐

17. Should states and territories be required to report daily air quality results and/or predict future air quality through an Air Quality Index or similar?

Yes ☒

No ☐

Overall comment

18. Please use the following space to provide any additional comments or suggestions on the Review of the National Environment Protection (Ambient Air Quality) Measure.

It is crucial for the Australian Dept of Health to be better informed through its own health impact assessment studies, in addition to its reliance on overseas studies.

Feedback form

If NEPC decide to vary the AAQ NEPM would you like to be contacted for the next phase of the consultation?

Yes

☒

No

☐

If you have answered yes, please provide your details:

Name: Carmen Largaiolli

Organisation (if applicable): BRAG Inc.