



## **SUBMISSION REVIEW OF THE NATIONAL ENVIRONMENT PROTECTION (AMBIENT AIR QUALITY) MEASURE**

### **INTRODUCTION**

Cement Concrete & Aggregates Australia welcomes the opportunity to make a submission to the *Review of the National Environment Protection (Ambient Air Quality) Measure*. CCAA supports the aim of the review, which is to examine the appropriateness of current standards in relation to new health evidence.

The discussion paper raises various issues for consideration, but the main area of concern for CCAA is the regulation of fine particles (PM<sub>10</sub> and PM<sub>2.5</sub>) and the proposed methodology for implementation of the NEPM, rather than the actual limits, or air quality goals.

### **CEMENT CONCRETE & AGGREGATES AUSTRALIA**

Cement Concrete & Aggregates Australia is the peak industry body for the heavy construction materials industry in Australia including the cement, pre-mixed concrete and extractive industries.

CCAA members account for approximately 90% of the \$7.21 billion in revenues generated by these industries that, between them, employ 18,000 Australians directly and a further 80,000 indirectly.

CCAA members operate rock quarries, sand and gravel extraction sites, cement production and distribution facilities and concrete batching plants throughout Australia.

There are approximately 2,200 quarries operating across the country that produce some 130 million tonnes of stone, limestone, gypsum, gravel and sand used to produce building and construction materials, such as cement, concrete, bricks, tiles, pavers and road paving. The revenue generated by these quarries is estimated to be \$1.63 billion per annum.

The industry produces 8.9 million tonnes of cement and 23.9 million m<sup>3</sup> of pre-mixed concrete, with a turnover of approximately \$5.58 billion per annum. Further value is added through the manufacture of concrete products and delivering concrete services.

CCAA'S members are servicing local, regional and national building, construction and infrastructure markets. The reliable and cost-effective supply to these markets is fundamental to sustainable growth and it is CCAA's aim to promote policies and planning frameworks that recognise the importance of these materials to Australia's sustainable future.

## MULTIPLE SOURCES OF PARTICLES

Given the nature of the industry, the issue of the health risk posed by fine particles (PM<sub>10</sub> & PM<sub>2.5</sub>) is of particular concern, and as such these fine particles are the main focus of this submission. It is of the utmost importance that regulators, the public and the industry itself understands the risks the industry does and does not pose relative to other sources of fine particles, and that any amendments to the NEPM do not drive unbalanced over-regulation on our essential industry.

The discussion paper contemplates moving from a 'permitted number of exceedences' approach to 'not-to-be-exceeded' standard. This inherently raises difficulties when considering that ambient and exceedence levels of particles are dominated by natural sources and, in urban areas, high ambient levels due to transport derived pollution.

The environment is a source of natural, or ambient, fine particles. Natural fine particles can increase in the ambient air due to natural events, such as bush fires and dust storms. It is generally recognised that these events are increasing both in frequency and intensity, which impacts on the measurement of fine particles. Therefore, any standard, around fine particles in particular, must have the capacity to allow for the natural variability of air quality, by allowing for a numbers of exceedences, either in absolute terms or as a statistical variation.

The discussion paper raises the option of effectively removing natural events exceedences from the standard, as they are not 'easily managed'. Difficulty in management is insufficient reason for exclusion. Further, the exclusion of these events will not ensure the 'adequate protection of human health and well-being', and as such would undermine the purpose of the review.

Also there is a risk that certain jurisdictions/ regulators will not act on these natural events and instead will increase emphasis on direct regulatory controls, which often largely targets stationary sources. CCAA believes that a methodology of minimising (or eliminating) the risks posed by large area sources may have little or no impact on actual health outcomes, as a large percentage of fine particles occur naturally due to regional natural events.

Removal of contextual data driven by changes in the NEPM, in terms of numbers of exceedences due to 'environmental' peaks and comparison with other exceedence sources, can lead to public confusion and manipulation of information by opponents to large area source developments, as widely experienced by the industry.

The impacts of dust storms and bush fire emissions in particular, are not outside the purview of the NEPM, and in fact should now always be purposely included in the NEPM process to support appropriate and even innovative controls and measures. Clearly the AAQ NEPM has an obligation to identify the main air quality issues, which should then lead to appropriate, consistent and proportional government actions. By not including 'natural' and 'exceptional' exceedences in the meeting of the standard the overall health and wellbeing purposes and outcome of the NEPM will not be achieved.

## **RECOMMENDATION**

CCAA recommends that assessment of compliance with all ambient air quality standards continue to include exceedences caused by natural events or sources, and continue to be based on a 'permitted number of exceedences' approach.

The CCAA fully supports the role and development of the NEPM AAQ, and the discussion paper certainly canvasses issues of significant importance to the CCAA. We look forward to further consultation on the issue of inclusion of natural exceedences in any proposed approaches to particles standards.

**KEN SLATTERY**

Chief Executive Officer

**CEMENT CONCRETE & AGGREGATES AUSTRALIA**

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