

Your ref:

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Secretariat
Standing Council on Environment and Water
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Thank you for providing the Western Australian Department of Environment Regulation (DER) with the opportunity to provide a submission to the Standing Council on Environment and Water (SCEW) regarding a national framework for reducing emissions from wood heaters.

DER recognises that the Australian Government has identified air quality as a priority for the SCEW reform agenda and through the developing National Plan for Clean Air.

In Western Australia, DER administers the BurnWise wood heater emission management program as part of the Perth Air Quality Management Plan (AQMP). The BurnWise program has regulatory and community education aspects. The regulatory component includes auditing of wood heater retailers under the Environmental Protection (Domestic Solid Fuel Burning Appliances and Firewood Supply) Regulations 1998. Under these Regulations it is illegal to sell a wood heater that does not comply with the requirements of AS/NZS 4013 - Domestic Solid Fuel Burning Appliances – Method for determination of flue gas emissions.

Standards Australia is currently reviewing the emission and efficiency standards for all new wood heaters offered for sale in Australia. The Standards Australia process is being done in parallel with the consultation regulation impact statement process by SCEW.

DER is supportive of the introduction of increasingly stringent emission factors and efficiencies for new wood heaters across Australia, which reflect the current direction of the Standards Australia review of AS/NZS 4013. Changes to AS/NZS 4013 will be enforceable under the Regulations in Western Australia, and would contribute to effective wood heater emissions management. Particulate emissions from wood heaters can be a key source of air pollution in Western Australia during the winter months. In addition, there is a strong association between particulate matter emissions and adverse health impacts in the community.

DER recommends that the Standards Australia decision regarding the review of AS/NZS 4013 be included as an option under the subsequent decision regulatory impact statement.

Yours sincerely

Jason Banks

ACTING DIRECTOR GENERAL

11 July 2013