

10th July 2013



*"When you can't breathe...
nothing else matters"*TM

Secretariat for the Standing Council on Environment and Water

GPO 787, Canberra, ACT 2601

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Dear Secretariat,

Re: Consultation regulation impact statement (RIS) for reducing emissions from wood heaters

Thank you for the opportunity to comment on this important initiative. Lung Foundation Australia (previously known as The Australian Lung Foundation) is aware of the adverse health effects of wood smoke on people, especially those with lung disease, and it has campaigned to reduce ambient particle pollution, including wood smoke. The effects of wood smoke are similar to those from tobacco smoking, which include short term and long term irritation of the lungs, resulting in symptoms (cough, wheeze and breathlessness), flare-ups of existing lung disease (especially asthma and chronic bronchitis), admissions to hospital and premature deaths (from lung and heart disease). No safe threshold for exposure to wood smoke has been identified, as is also the case with exposure to tobacco smoke.

The Lung Foundation supports all efforts to reduce wood smoke pollution, including a national approach to the management of wood heater emissions. Our preferred approach is for residents to switch to cleaner sources of home heating which do not involve any emissions of smoke particles or gas. Electrical home heating with reverse-cycle technology provides an efficient means to achieve this and also permits cooling of the home when the weather is hot. Gas heating is the alternative preferred source for home heating. These heaters should be flued to vent the products of combustion (carbon monoxide and nitrous oxides) to the outside.

Wood fuel is the least preferred option for home heating because of the wood smoke which is created. Of these options, pellet fires produce the least smoke and are the preferred option if a resident chooses wood fuel. A modern slow-combustion wood heater is the next best option together with optimal operation. The latter requires operator education and experience to use only dry wood with correct log size and placement and measures to achieve a rapid hot burn during start-up (and reloading) which minimizes the inherent smoke fumes.



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One important consideration is that the wood smoke, which is emitted from wood heaters, enters the neighbourhood air shed and can affect all residents, irrespective of their choice of home heating. This is especially important in populated cold inland valleys where temperature inversions occur in the winters and trap pollutants close to the ground rather than allowing them to be dispersed away from human habitation. There are well-documented examples of this wood smoke from home heating occurring in the Tamar Valley in Tasmania, the Tuggeranong Valley in the ACT and in Armidale, NSW. Australian and State Governments have acted appropriately to limit the exposure to environmental tobacco smoke in public places to protect non-smokers and especially children. In comparison, a non-smoker who chooses not to burn wood for home heating, is not afforded this same protection by Government when wood heaters are permitted to pollute a neighbourhood.

The Lung Foundation supports the goals of this consultation process. Of the nine options presented to reduce wood smoke, the Lung Foundation supports the one which will lead to the greatest reduction in wood smoke, given that there is no safe threshold level of this. Option nine in the RIS, which requires emissions from wood heaters to be below 1.5g/kg, is the preferred option of those presented. An even better option would be to phase out wood heaters altogether, except those in rural communities or remote regions where emissions are low because of a low population density. The Lung Foundation recommends that additional measures be introduced to deter residents from burning wood and to compensate the community for the associated costs (also well documented), as is done with the control of tobacco smoking. Monies raised from this new revenue could be used to assist residents to switch to cleaner forms of home heating. Whichever of the nine options are implemented, the Lung Foundation recommends that the policy be reviewed after a period of perhaps two years, to decide if further restrictions are needed to protect lung health.

Yours sincerely,

Dr James Markos

Spokesperson on Air Pollution

Lung Foundation Australia

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