

Submission from the Centre for Air quality and health Research and evaluation

The Secretariat

Standing Council on Environment and Water

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Subject: Consultation regulation impact statement for reducing emissions from wood heaters

Thank you for the opportunity to comment on the consultation regulation impact statement (CRIS).

The Centre for Air quality and health Research and evaluation (CAR) is a Centre of Research Excellence funded by the National Health and Medical Research Council (www.car-cre.org.au). CAR's role is to enable research on the impact of air pollution on human health and to translate that research into contributions to policy that aims to mitigate that impact. CAR is creating opportunities for researchers, operating in diverse but related disciplines, to create and apply knowledge about air pollution and health of both national and international interest. CAR is a collaboration among senior researchers in the fields of epidemiology, toxicology, air physics and chemistry, biostatistics and clinical respiratory medicine based at universities in Queensland, New South Wales and Victoria. CAR investigators are currently undertaking research in many of the fields alluded to in this submission.

The evidence of harm from particulate air pollution is clear and has been well summarised in the scientific literature. Smoke from wood heaters has been associated with a wide range of adverse health outcomes including exacerbation of respiratory diseases and admissions to hospital (1). CAR has recently published a study showing that ambient wood smoke exposure is related to severity of asthma. This effect was seen even among asthmatics who did not have a wood heater at home, which suggests that high prevalence of community use of wood heaters can have an impact at the community level (2). Intervention studies have

demonstrated that wood heater control programs are associated with better air quality, improved children's respiratory health and reduced community mortality rates (3,4).

Wood heaters are an important source of both indoor and outdoor air pollution, and indoor concentrations are substantially higher than outdoor concentrations. Globally, in 2010, 3.5 million and 3.4 million deaths were attributable to indoor and outdoor air pollution respectively (5).

As highlighted in the CRIS, wood smoke is an important contributor to air pollution in Australia. Action to reduce emissions from this source will clearly result in important benefits to the health of Australian communities. It is of concern that there has been a general trend towards increasing use of wood heaters. For example, the Australian Bureau of Statistics reported a 12% rise in the number of Tasmanian households using firewood as their main heating fuel between 2008 and 2011 (6).

The CRIS provides a comprehensive overview of the problem of residential wood smoke and the nature of the wood heater industry in Australia. It acknowledges some of the main shortcomings in current regulation, such as, failure to enforce regulations and standards, and differing regulations between states.

CAR supports most of the recommendations of the report. However, we disagree with the assertion that measures such as (a) the removal of non-compliant heaters on the sale of a house and (b) bans on wood heater installation in critical airsheds "were not considered feasible as part of a national program ...". CAR supports the implementation of a national approach to the control of smoke from wood heater with closer collaboration between the states that includes both regulatory and non-regulatory approaches. However, we believe that in some specific airsheds, for example, where large populations are exposed to severe particulate air pollution from wood heaters, it would be appropriate to consider specific regulatory approaches including the removal of non-compliant heaters and considerably more stringent standards for newly installed heaters. Such approaches have been successfully implemented in other jurisdictions including the ACT.

Thank you once again for the opportunity to comment on this important national initiative.

Yours sincerely

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