

15 July 2013

Standing Council on Environment and Water Secretariat
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ENVIRONMENTAL
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(NEW SOUTH WALES)

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Dear Sir/Madam,

Submission – Consultation RIS for reducing emissions from wood heaters

We thank you for the extension in time granted to make this submission.

I am writing to you on behalf of the members of Environmental Health Australia (New South Wales) Incorporated.

Environmental Health Australia (formerly the Australian Institute of Environmental Health, established in 1936) is the premier professional body concerned with environmental health standards. Its mission and objectives are to contribute to the improvement in environmental health standards in Australia by:-

- Developing and advancing the practices and policies of the environmental health profession;
- Co-ordinating and representing the views, concerns and interests of members;
- Disseminating knowledge on environmental health to individuals, the community, governments and other organisations;
- Promoting excellence in environmental health practice; and
- Advocating the objects and policies of the organisation.

EHA (NSW) Inc has members from Federal, State and Local Government as well as private practice. However, the majority of our members are employed in Local Government and as such work on the frontline when it comes to dealing with the emissions from wood heaters – in both the response to complaints about excessive smoke from existing wood heaters, and the planning associated with new installations.

EHA (NSW) Inc has a number of concerns in relation to the current framework around the installation and use of wood heaters, including:

Health Impacts

In relation to the health impacts associated with wood heater use, EHA (NSW) is most concerned about emissions of PM2.5 and polycyclic aromatic hydrocarbons (PAH). Without going into a literature review of the current position of medical and health research, many studies from respected scientists publishing in peer reviewed journals have clearly linked adverse health effects to exposure to PM2.5 and PAH.

The former NSW Department of Environment, Climate Change and Water states in their *Action for Air 2009* document that there is no safe threshold level to use for setting standards. They also state that PM2.5 is now considered the most health hazardous air pollutant. Health impacts have been shown to be extensive including numerous cardio-pulmonary effects, increased morbidity and increased mortality.

Wood smoked contains the same and similar toxic chemicals to tobacco smoke including numerous varieties of PAH. According to the Australian Air Quality Group, a wood heater burning 2 tonnes of wood a year will emit the equivalent of 32million cigarettes worth of PAH.

Another pollutant caused by the use of wood heaters is dioxins. The National Dioxins Program in 2002-2003 highlighted a seasonal cycle in dioxin concentrations with higher concentrations in winter most likely due to smoke from domestic wood heaters. Whilst the National Dioxin Program revealed that dioxin concentrations in NSW were very low when compared with other areas internationally, the serious and persistent health impacts related to dioxin exposure should give policy makers cause for concern.

Emission Sources

Without going into great detail, the NSW Environment Protection Authority's Air Emissions Inventory 2008 shows that wood heaters contribute a considerable amount of particulate matter pollution in the Greater Metropolitan Region (GMR) and the Sydney Region. In the GMR and Sydney wood heaters contribute a disproportionately high level of PM2.5 to the airshed when compared with the low number of households that use wood heaters for heating. A similar situation prevails in regional centres such as Armidale, Wagga Wagga and Lithgow.

In Sydney domestic solid fuel combustion (i.e. wood heater use) is the source of 50.64% of all human-made PM2.5 emissions. The next largest contributor is only 5.54%. For the GMR, wood heater use is the second largest contributor of PM2.5 emissions at 23.18%. The NSW EPA estimates that only approximately 12% of households across the state use wood heaters for space heating.

A point to consider when examining the above figures is that the above figures are averaged out over a whole year. In reality wood heaters are typically used for only 3-4 months of the year and as such their contribution to emissions (and also health impacts) at time of use will be much higher than reported by the Air Emissions Inventory.

In view of the above, EHA (NSW) Inc believes the significant impact that results from the activities of so few warrants further attention and action by Governments at all levels.

Existing Regulation in NSW

The current framework for dealing with new and existing wood heaters in NSW is problematic. It is typically left to individual councils to decide on their approach to wood heaters. This is a significant problem in areas where a number of councils occupy the one airshed. In this situation, the best efforts and intentions of one council can be negated by the apathy of the other(s). With this in mind, any new framework for reducing wood heater emissions must focus on airsheds as a whole. It should not be left to individual councils, and the particular political or personal view of the elected members and/or executive, to choose a course of action.

When trying to deal with new installations, the planning system makes it very difficult for councils to implement controls that best protect the health of residents. In NSW the only way to

prohibit any sort of development is to have a specific section of a Local Environment Plan clearly prohibit that development. Advice from some of our members indicates that the NSW Department of Planning and Infrastructure will not support the inclusion of a control that prohibits that installation of wood heaters.

In addition, trying to impose a stricter standard than currently allowed 4g/kg under the Protection of the Environment Operations Act 1997, is convoluted and difficult – relying on amendments to individual council Development Control Plans and Local Environment Plans. Amendments to these can be vetoed by the NSW Department of Planning and Infrastructure should they feel that any proposed changes are unnecessary or unwarranted.

When dealing with existing wood heaters, the Protection of the Environment Operations Act 1997, only allows councils to deal with wood heaters that are deemed to emit excessive smoke as determined by the Act. It does not provide councils with the tools to deal with wood heaters that might be operated in a more environmentally satisfactory manner.

Future Framework for Reducing Emissions

EHA (NSW) Inc want to see the following points included in any new regulatory framework:

1. The protection of the health of the population must be the paramount concern;
2. Airsheds must be covered as a whole;
3. New installations and existing installations are dealt with including the capability to prohibit new installations, and require the removal or retirements of existing wood heaters, in critical airsheds;
4. A system of continuous improvement in wood heater design is implemented so that overtime the emissions levels of new wood heaters is reduced to the fullest extent practicable; and
5. Adequate financial and other resources must be provided to councils to allow them to undertake any additional responsibilities as a result of any new regulatory frameworks and programs aimed at reducing the impact of wood heater use.

We request the Standing Council to be mindful of the ability of local government to undertake any additional roles that may be recommended as a result of this process. Local government has suffered for many years from cost shifting by numerous State Government agencies that have not properly consulted *and* listened to our concerns.

We would recommend to you the model implemented by the NSW Food Authority during the development and initial implementation of the Food Regulation Partnership (FRP). This approach was characterised as one that was thorough and which actively listened to the concerns of our members; and which ultimately resulted in the provision of additional advisory, regulatory and financial resources for Councils. As a result, the FRP has seen a great deal of improvement in the skills and knowledge of local government in relation to food safety, and thus better protection for the NSW community.

Please do not hesitate to contact me on (02) 9181 3320 or nsw@eh.org.au if you have any questions.

Yours sincerely,



Paul Reynolds.

Secretary

EHA (NSW) Inc