

To: SCEW Secretariat
Subject: Wood Heater RIS Submission

Please see below comment provided on the RIS for Domestic Wood Heaters.

The scope of the RIS is too narrow. It considers the affect of wood smoke from Domestic Heaters on the air quality within the general airshed. However it does not consider how significant this is in relation to other sources eg burning off by land management agencies (eg State Government), or private burning off. While the health issues surrounding wood smoke from domestic wood heaters is significant, there should be consideration of other sources (particularly burning off in the urban fringe).

The focus of changes to the Australian Standard is to increase the performance of domestic wood heaters that are operated correctly (under test conditions). This does not take into consideration the fact that it is common for wood heaters to be operated poorly (as recognised in the RIS). This suggests improvement in design should also consider how to 'foolproof' the design of wood heaters to limit the adverse impacts of poor operation.

Regardless of the above, there was suggestion at the Perth forum from a retailer of wood heaters that 80% of the wood heaters being sold are compliant with the most stringent standards proposed. If this is the case then there is probably no good reason not to bring in the lower emission/higher efficiency standards. With the continual reduction in property sizes it is also not unreasonable to expect the requirement standards be as high as possible.

Education is always going to be a key element in improving the operations of 'in service' wood heaters. Another element is the enforcement of Local Laws and Regulations relating to excess smoke (where education fails). In WA Local Governments are focussed on the immediate nuisance that a smoky wood heater poses to the neighbour rather than the impact on the Perth airshed (and wider health problems). Enforcement action against poor operators is virtually nonexistent in WA due to inadequate legislation (including the lack of a common definition of smoke nuisance that is recognised by the courts).

There is anecdotal evidence that the installations of wood heaters are not always in compliance with the AS. This affects both how smoky the heater is but also how the smoke plume behaves. This can have a significant impact on the potential for neighbourhood complaints but is not always easy for a Local Government to assess. Perhaps a written certification could be provided upon installation to limit the non compliant installations.

regards

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