

Standing Council on Environment and Water Secretariat  
GPO Box 787  
CANBERRA ACT 2601  
[SCEW.secretariat@environment.gov.au](mailto:SCEW.secretariat@environment.gov.au)

H13/62590-8

To the Standing Council on Environment and Water

**Consultation regulation impact statement for reducing emissions from wood heaters**

Thank you for the opportunity to provide comments on the consultation regulation impact statement for reducing emissions from wood heaters (CRIS). NSW Health has reviewed the CRIS and would like to submit the following comments for consideration of the Council.

Smoke from wood burning heaters makes a substantial contribution to air pollution in NSW. Wood smoke is the largest source of PM<sub>2.5</sub> and PM<sub>10</sub> in Sydney, and is a significant source of particle pollution in many regional centres. Exposure to certain particle pollution is associated with mortality and morbidity from cardiopulmonary disease and there are significant health gains to be made by reducing wood heater emissions.

The health costs associated with the use of wood heaters provide strong justification for additional regulation and NSW Health supports a national regulatory approach. Such an approach would provide clarity for industry and ensure the health benefits associated with enforceable standards to reduce wood heater emissions are realised in all jurisdictions.

Steps should be taken to minimise exposure to particulate pollution from wood heaters as much as possible. Therefore, NSW Health's preferred option is option 9, which would provide a 1.5g/kg emission standard, 60% efficiency standard, a compliance and education program, and in-service measures.

We note that the CRIS used a 20 year timeframe to estimate the net benefits of each option. However, the benefits from wood heater regulation will persist for many decades and the use of such a short timeframe results in an underestimation of net benefits of regulation. Furthermore, the most stringent emissions standard (option 9) takes the longest to implement and so any underestimation will be greatest for this option.

Section 7.4 of the CRIS states that, "Industry stakeholders argue that few companies would have the margins to support the significant research and development effort required to move beyond 3g/kg". This statement is at odds with the Australia Home Heating Association's submission to the *Senate Standing Committee on Community Affairs on the impacts on health of air quality in Australia*, which stated that the industry is already considering tighter standards as part of the Australian Standards CS062 committee and that a 1.5g/kg emission standard with an efficacy dividend of 60% could be achieved by 2019. Therefore, it seems likely that, since the CRIS was written, industry has increased its capacity to comply with a more stringent emissions standards.

We note that the data used in CRIS is from 2010 or earlier. It is possible that, due to recent rises in electricity and gas prices, consumers may be increasingly favouring wood heating over alternative heating options. If this is the case, the true base case emissions scenario may be worse than the base case discussed in the CRIS. Therefore, the policy options discussed may have an even greater health benefit.

Thank you again for the opportunity to provide comment. If you have any further questions regarding our submission, please contact Professor Wayne Smith, Director, Environmental Health Branch, Health Protection NSW on (02) 9391 9040.

Yours sincerely



Dr Kerry Chant  
Chief Health Officer and Deputy Director-General  
Population and Public Health

13/8/13