

27 June 2013

The Council of Australian Governments  
Standing Council on Environment and Water  
[SCEW.Secretariat@environment.gov.au](mailto:SCEW.Secretariat@environment.gov.au)

Dear Sir/Madam

Submission - Regulation Impact Statement for reducing emissions from wood heaters

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Thank you for the opportunity to review the National Environment Protection Council's Regulation Impact Statement (RIS) which discussed possible strategies to reduce emissions from wood heaters.

Whilst Hornsby Shire Council is in agreement with the RIS that a nationally consistent approach is required to manage wood heater emissions, the document detailed a number of potential measures to reduce wood heater emissions from *new* wood heaters, despite advising that the national turnover of existing stock of new wood heaters is estimated to be less than 2% per annum. As such, it is strongly believed that further measures be implemented to reduce emissions from in-service wood heaters.

Hornsby Shire Council receives approximately 20 complaints per year in relation to air pollution due to incorrect use of wood heaters from residents within the Shire. In response to these complaints, Council has adopted the guidelines of the Department of the Environment and Water Resources and takes an educational approach, advising residents of the ways in which to correctly operate their in-service wood heaters.

In many instances however, investigations are difficult as Council's Officers are unable to witness 'excessive smoke' as per the *Protection of the Environment Operations Act 1997* being created from a property's chimney, or a complaint is unable to be resolved due to the source of the air pollution being unable to be located.

As such, whilst the potential measures to reduce wood heater emissions within the RIS could fall under a number of Policy options, the recommendation of a national regulatory approach being implemented is the preferred approach of Council. This approach would see reduced emission and efficiency standards being introduced, and compliance and education measures being implemented to allow for significant reductions in wood smoke air pollution over the medium-long term.

A national regulatory approach would also ensure new wood heaters complied with adopted standards for emission performance and promote compliance of retail models against efficiency standards, whilst also targeting the performance of in-service wood heaters which exhibit a large variation in emissions due to heater operation and installation.

Council thanks you for the opportunity to provide feedback on the Regulation Impact Statement for reducing emissions from wood heaters. Should you wish to further discuss this matter, please do not hesitate to contact Mrs Nichola Clarke, Council's Acting Compliance Team Leader on 9847 6668.

Yours faithfully



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