

David Fowler
LBL Review
Regulatory Reform and Advice Branch
Environment Protection Authority
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Dear Mr Fowler

Re: review of the load-based licensing (LBL) scheme – issues paper

Thank you for the opportunity to provide comment on the LBL issues paper. NSW Health has reviewed this issues paper, and provides the following comments.

When considering the population health risk represented by an emission source, this risk is primarily a function of the amount of Particulate Matter (PM) emitted and the size of the population impacted. It is important to note that PM_{2.5} can travel large distances and point source emissions can contribute significantly to the air quality of communities far from the emission source.

Of the common air pollutants, the evidence of health effects is strongest for PM. The liable LBL fees for assessable air pollutants in NSW (2013-14) (Figure 3-5, page 20) appear to emphasise NO_x. While I am unsure of how to interpret these figures, the emphasis on NO_x may not reflect the relative health impacts of the different types of emissions for which the relative health impact of PM would likely be greater.

Larger particles (PM_{>10}) can cause nose and throat irritation. However, these particulates are not considered inhalable particles and compared to smaller, inhalable particles, their health impact is generally considered to be much more mild. On this basis, removal of coarse particulates from the LBL scheme could be considered as proposed.

Yours sincerely



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