

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

First Name: Douglas

Last Name: Crosner

[REDACTED]
[REDACTED]
Postcode: [REDACTED]

I would like to comment on the proposed actions and note some other issues in relation to the specific matter of air pollution from residential wood heaters and experienced by neighbours.

I have [REDACTED] a neighbour with a wood heater for around 10 years and raised two children in that environment. We live in a residential area with sparse use of wood heaters, and the neighbour's flue is around 25 meters from our living area and house. After family members developed health issues after exposure to strong wood smoke we took measures to seal up the house and purchased air purifiers and took a lot more care to try to avoid a house full of smoke. We also raised the issue with the neighbour who claims to be an experienced operator and are dismissive of our concerns. While these actions might have helped a little, you can smell the smoke coming in through cracks in window frames and natural ventilation points etc and by midnight our house often smells like an ashtray,

I have pleaded with many people for help and the response from the government was not helpful. Some other people who were also wood smoke affected offered some help and the TAS EPA directed me to their work. Our council investigated and made a determination that it was not a nuisance and took only token actions such as suggesting cleaning the flue and raising the flue height a little and offered education on correct operation - these did not solve the problem for us and the smoke is still very bad and you mention some of these same proposals which are not effective. A response of denial and dismissal and mis-direction is common. I have had council officers lie to my face while smirking about it, and councillors claiming they have no responsibility to consider the health dangers and have not authority to stop a wood heater or even to try and persuade people to use other forms of heater. I have seen State and Federal governments misrepresent the problem as one that can be addressed by slightly tighter standards here or there or better enforcement of these standards. Sorry, these measures will not solve the problem, that is an undeniable fact. I have worked with some other people and families affected by wood smoke, and seen similar experiences, one even complained to a State Ombudsman and while the results are subject to secrecy laws I know the facts independently I find the response absolute shameful. I have had a mother contact me complaining that her children complain of wood smoke in their bedrooms from a neighbour, that she smells the wood smoke in their hair, and that their council will not take actions, it seems shameful to me that the government in Australia support and encourages this.

I have attempted to measure the air quality and study the scientific facts and they are simple:

* Wood heaters emit a lot of toxic pollution. There is lots of data to back this up. This is not 10's of percent more, rather thousands if not

orders of magnitude more pollution than the closest combustion heater alternative in gas. Even your consultation paper graphs seem to support this claim on their average contribution.

* Even when operated with the best of intentions wood heaters emit a lot of pollution.

* The concentration increases roughly four fold for every halving in the distance to the emission point. By this rule the concentration difference between 8 meters and 256 meters is 1024 times higher, so by this rule a wood heater that might have been acceptable 256 meters from neighbouring sensitive land would have to be 1024 times less polluting to be similarly acceptable 8 meters from a neighbour.

* There is no foreseeable advance in wood heaters that would yield a 1000 times reduction in their pollution, and by then most people using gas might have transitioned to renewable energy anyway with no local air pollution.

* Wood heaters emit very unpredictable levels of pollution and the exposure of close neighbours is also very unpredictable with extreme levels when started or stoked but also extreme if not operated well. TAS EPA studies show this, and I have made similar measurements.

* The exposure of a close neighbour can be far more than a linear average of the emissions from a wood heater or even a linear average of the outdoor concentration. For example, if an open house fills with smoke and is closed then it locks in that pollution giving a much higher exposure than the outside average, and the smoke seems to get absorbed into materials inside a house and then slowly releases into a closed house. The extreme pollution concentration peaks and unpredictability of wood heaters is a key issue that has been ignored, one that causes them to affect neighbours even when not in use by requiring neighbours to keep houses close and sealed out of fear of getting a house full of smoke. There appear to be no national standards for measuring these characteristics, and even an hourly PM average mis-represents the facts. The permitted emission levels in the standards also do not appear to take these dynamics into account. An average may well be useful for a wood heaters far from neighbouring sensitive land, but not appropriate to assess the impact on close neighbours from what is a point source.

Reading your Consultation Paper I see many of typical claims and mis-directions that just do not stand up to the facts, and let me just point out some:

* "This Clean Air for NSW Consultation Paper presents a proposed approach and actions for government to meet its goal of improving average air quality results across NSW."

The fact is that the "average air quality" experienced by a neighbour of a wood heater operator mis-represents their exposure and the impact on the neighbours, so this focus has already biased the consultation against justice for the community of neighbours of wood heaters and probably people with pollution sources with similar characteristics.

* "It is proposed that changes to the wood heater regulatory framework will adopt the updated Australian/New Zealand Standards for new wood heaters, which set more stringent emission limits and new efficiency limits."

Such small changes are trivial token measures, this is not an adequate response to address the impact on neighbours in residential areas. If you are even going to have a standard method of measuring the emissions then it should take into account the peaks in the concentrations so they can be input into a model of the exposure inside a nearby house. Having a separate standard for wood heater emissions also fails to place them in competition with other technical advances, giving them a protected status that is not a rational response of a community to improve their air quality.

* "The EPA will undertake periodic compliance audits to ensure that heaters offered for sale in NSW are complying with the new national standards."

The problem is not that wood heaters do not meeting the standards, as even a standard compliant wood heater is very polluting.

* "The EPA is undertaking further research into the impacts of wood heaters across the GMR and lower emission standards."

We already know the impact and how polluting they are, so such claims just kick the problem down the road.

* "In consultation with stakeholders and the wider community, it is proposed that the EPA will investigate further improvements to the wood heater regulatory framework for consideration by Government, as well as education, training and replacement programs."

The neighbours of wood heater operators are very significant stakeholders and I don't see you consulting them, and they were not represented in the development of the Australian Standards in violation of the policies for their development.

Even wood heaters operated with the best of intentions and training are very polluting so it is not just a matter of education and training. To advance a State policy of education and training or smoke reduction might be demaging as I have seen councils and wood heater operators try to hide behind these as if following them is exercising due care, and it just spurs them on and delays them coming to the inevitable conclusion that they are doing the wrong thing operating a wood heater.

The only useful "replacement program" would be to replace wood heaters with gas heating or better yet reverse cycle air conditioning, but you don't make that clear, if you are alternatively suggesting replacing them with slightly less pollution wood heaters then that will not solve the problem.

* "It is not proposed to take action on the use of fire for cooking and recreational purposes, such as for camping or using outdoor pizza ovens and barbecues."

For goodness sake, people don't need to burn wood to cook a pizza, these are also very polluting. What about Chimineas and fire pits which are very polluting and release the emission at ground level too. I see significant air pollution from wood fired pizza and charcoal chicken businesses and it's laughable to suggest they implement adequate controls.

* "Local councils can implement controls on wood heaters."

This is not my experience rather most councils will not act and they typically claim it is a State Government responsibility. I have never

seen a council install monitoring equipment to collection real evidence. Some have tried to use odor measurement policies, but these are subjective a short samples. I even campaigned for election at our last council election on this issue and received only a very small vote, proving how difficult and impossible it would be to obtain justice on using path. The fact is that the community of neighbours of wood heater operators can be small and not a significant vote.

* "The EPA's role on the other hand is to develop policy and regulations and contribute to the development of national standards."

That's right, you were responsible for giving the councils an acceptable clearance distance between a wood heater flue and neighbouring sensitive land. However you released only some guidelines, and even then they were grossly inadequate. I recall mention of a 15 meter separation which is a complete joke, my neighbours flue is 25 meters away the the smoke still very bad. Then there is the exclusion of the mandatory clause in the installation standard that prevents the installation of flues where the gasses were likely to enter nearby openings by qualifying this installation standard to only apply to the building in which the wood heater is installed. I have again and again seen councils investigate and claim that a wood heater is 'compliant' and thus ok and they even write to the operators reassuring them which just spurs them on, but complying with your Building Codes has nothing to say of the safety for neighbours does it.

You could develop a policy of gathering good evidence upon a complaint which would be to install an array of low cost PM monitors around a property affected and within the home and to monitor for a good period if not permanently because over a short test the neighbour can change behaviour just for the test.

I don't see how you can contribute to national standards if you come to them constrained to not being able to act to limit the use of wood heaters, such a conflict of interest would seem to exclude your participation.

* "The EPA also conducts research and provides assistance to councils to run wood smoke reduction community education campaigns"

Have you told the public and the councils just how high the concentrations are close to the emission point, and pointed out the extreme peaks and unpredictability and how this increases exposure?

I see government publications, and CSIRO publications on emissions, but not much on the concentrations neighbour experience, except for some publications from the TAS EPA.

Again you are going on about "wood smoke reduction", which is never going to solve the problem.

* "The use of fire for cooking and recreational purposes, for example camping or using outdoor pizza ovens and barbecues, is already regulated appropriately under environmental legislation; operators are required to use the correct fuel and take care to prevent or minimize air pollution."

Wood is certainly not a "correct fuel", can you just say that and put that in the legislation.

You need to tell the government the facts that wood heaters and burning wood is too polluting to be used close to sensitive residential land,

that a 250 meter clearance should be a minimum, and that education and better standards and better enforcement of standard are smaller matters that will never close the 1000+ fold improvement that would be needed to make wood heaters acceptable for use in residential areas. They need to be told the facts.

The government needs to start changing the culture of wood burning, educating people in preparation for banning this activity. If the government thinks it is too unpopular then please consider funding legal support for affected residents to take actions in the courts, and we badly need some precedents to establish what evidence would be accepted etc. Consider at least roll-over stamp duty exemptions for people moving away from demonstrated wood smoke affected land.