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Dear EPA and Minister Speakman,

Thank you for the opportunity to make comments on the Clean Air for NSW Consultation Paper.

The World Health Organization's recommends a maximum exposure level to PM2.5 dust of 10 micrograms per cubic meter. Any increase in PM2.5 correlates directly to an increase in morbidity and mortality in exposed populations – additionally children are especially at risk to respiratory disease. Extraction activities are a significant source of PM2.5 and importantly the composition of dust from hard rock quarries is over 40% quartzite. PM2.5 emissions from extraction activities is being grossly underestimated by NPI as they generally only consider fuel as a source. Importantly the dust from some extraction activities contains naturally high levels of heavy metals (e.g. lead 17ppm - greywacke) which is also being ignored by NPI monitoring.

The NPI's Technical Advisory Panel claimed uncertainties at that time in determining PM2.5 emissions in dust. Since that time there has been a substantial amount of new published epidemiological data detailing the impact of PM2.5 dust on populations and children. The WHO recommendation cited above needs to be properly considered given there has also been significant improvements in the ability to determine and monitor PM2.5 emissions.

In November 1989, the UN General Assembly adopted the Convention on the Rights of the Child (CRC). Australia ratified the CRC in December 1990. The Commonwealth of States have a duty to ensure (and report otherwise) that all children in Australia enjoy the rights set out in the treaty. Article 6 and 24 detail children's rights to develop healthily and in a clean environment. Additionally, the Commonwealth has a fundamental moral obligation to protect all citizens.

Given; a) the Commonwealth's obligations under the Convention on the Rights of the Child, b) the toxicity and mobility of PM2.5 dust and c) the close proximity of families to extraction activities:

- Why are PM2.5 dust emissions from extraction activities not now being recorded by NPI?
- Why are heavy metals in dust plumes from extraction activities not now being recorded by NPI?
- What health risk impact assessment was done on children of neighbouring families surrounding Extraction activities?
- Has the Commonwealth properly investigated and reported on the exposure of children to PM2.5 dust pollution from quarries/mines?

It is tragic that Australia has one of the highest incidence of childhood respiratory disease in the developed world yet lags behind other developed countries by failing to address the obvious.

Thank you

Kind regards,
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