

Dear EPA and Minister Speakman,

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

There are many things that the NSW Government MUST do to improve air quality and protect the health of the community. A strong air pollution control strategy for NSW must seek to reduce pollution levels to the lowest level possible, not to just below the national standards. There are significant health benefits in reducing pollution concentrations to well below the national standards. An effective air pollution control strategy must be based on objectives that are measured (e.g. a 50% reduction in emissions from coal mines by 2020), actions that are monitored, and meaningful community involvement. This includes Government recognition of the WHO's position that vehicle based diesel emissions are a proven killer & preventing release of these emissions MUST be a high priority where road tunnels are proposed.

1. Eliminate air pollution from power stations. Our five largest coal-fired power stations emit huge quantities of fine particle (PM2.5) pollution, sulphur dioxide, oxides of nitrogen and a wide range of toxic pollutants. The NSW Government must commit to supporting the rapid closure of these major polluters and a planned transition to non-polluting renewable energy. This transition needs to be carefully managed to minimise social impacts. In the short-term, coal-fired power stations must be required to implement all available measures to control air pollution.

2. Legislate to ensure that the RMS is forced to comply with the development condition that there be zero emissions from road tunnel portals here in NSW. At present there are NO monitors at any tunnel portals in NSW & it is clear that all existing road tunnels breach this development condition.

3. Introduce legislation as a matter of urgency that all existing & proposed road tunnel exhaust stacks MUST be filtered! The filters must be capable of trapping the cancer causing diesel particulate matter < 2.5 microns.

4. Ensure that all road tunnel exhaust stacks are not placed at or near road tunnel portals. This ensures that any pollution detected at a portal could only have emanated from that portal, or the portal adjacent, thus indicating a breach of the development consent. Proposed tunnels MUST be designed to ensure that this condition is met.

5. Place pollution monitors in areas where concentrations of traffic pollution exist e.g. the CBD, White Bay, the City West Link, Parramatta Road, Victoria Road, North Sydney & the approaches to the Sydney Harbour Bridge. Currently pollution monitors are located away from pollution hot spots. The monitor in Rozelle is under a tree in Callan Park & the nearest one to Rozelle is in a forested area at Lindfield. Acknowledge that the location of the existing network of monitors produces results that do not accurately reflect air quality.

6. Legislate to enable the EPA & the OEHL to enforce existing & proposed legislation in relation to breaches by the RMS as well as by polluting industries.

7. Control air pollution from coal mines. In the Hunter and other coal-mining regions, open cut coal mines are responsible for about 90% of coarse particle pollution, which have doubled in the last five years and trebled in the last ten. The consultation Paper proposes no significant new measures to tackle these emissions. The Dust Stop program which aims to reduce coal dust by 80% isn't working. New and expanded coal mines should not be approved where pollution levels exceed the national standards. Existing coal mines need to be much more actively regulated to control coal dust.

8. Cover coal wagons. Each year, millions of uncovered coal wagons pass through residential areas throughout NSW. Independent studies have demonstrated that particle concentrations increase significantly as these wagons pass. Covering wagons can reduce coal dust emissions by 99%. The Government must require all coal wagons be covered.

9. Scrap dirty wood heaters. Wood heaters are responsible for 47% of Sydney's fine particle (PM2.5) pollution each year; up to 75% in July. This is a very high priority for controlling air pollution and one of the most cost effective options. A small incentive would support residents to replace their polluting wood heaters with clean, efficient heaters. Incentives for home insulation would reduce the need for heating. All new homes are to be designed to ensure minimal heating & cooling thus reducing the need for energy consumption.

10. Clean up Government bodies that contribute to pollution such as the RMS. Vehicle derived & industry based air pollution costs both the people & the Health System of NSW dearly, with the most polluted communities carrying an unfair share of this burden. These communities suffer a disproportionate rate of pollution based illness & disease. By requiring polluters to pay, the NSW Government can create incentives for cleaner production. Load-based licencing fees paid by major polluters should be significantly increased. An analysis by Doctors for the Environment Australia recommends increasing fees to 50 times the current rate, so that polluters pay for their health impacts. Load-based licencing fees MUST also be paid by coal mining companies which are currently exempt.

Sincerely,

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