Dear Minister Speakman,

Thank you for the opportunity to make a submission on the Clean Air for NSW.

I was disappointed in the Clean Air for NSW Consultation Paper. It was an unconvincing hybrid of science and information and Public Relations with initiatives of trivial value featuring quite prominently in the text while policies that would make a huge difference to the situation did not even rate as options to be discussed. The document also had the slightly patronising tone that documents that downplay science for PR frequently display. Consistent with this, the philosophical aspects of what might be done and the coming future conference are somewhat overdone but the scientific facts and possibilities for significant policy changes are given much less attention than could reasonably have been expected.

The boast about Northconnex and Westconnex are fatuous in that they further tie Sydney to a car-dependent future, and even the minor light rail project pales into insignificance beside the lack of suggested action on coal mining and burning, electricity sources and even banning wood stoves.

This submission will try to address some issues with regard to their relative importance.

First it must be recognised that air pollution is a symptom of a poor use of resources, and a new look at resource use would be an important starting point.

1. The object of limiting consumption of goods as well as energy will lessen pollution. Growth is generally measured as consumption and this is not sustainable as goods are produced in ever larger quantities with ever diminishing labour. This is not good on a finite planet. The good news is that growth can be achieved without necessarily increasing energy or resource consumption.

2. Many items produced in Australia are very wasteful. Houses are the largest in the world, and by taking up needless room and being standalone, much more land is needed, the cities sprawl, and low population concentrations make the provision of public transport more difficult. An urban consolidation strategy would be part of reduced energy consumption.

3. Many disposable items do not need to be created or purchased at all. Bottled water consumes energy in its production, distribution and disposal, yet in most cases there is tap water where it is consumed. Governments need to intervene in the market to lessen wasteful consumption. Other items such as pressurised products that do not need to be in pressurised packs both waste energy in their lifespan, but also add to VOCs in the environment, such as cosmetics and food products.

4. In terms of energy use better insulation of houses would save large amounts of energy, as would urban consolidation with flats and units replacing houses.

5. In urban transport terms, public transport needs to substitute for car dependency and this requires far better urban planning than has been contemplated so far with urban planning reduced to rubber stamping proposals put by interests who merely want to make an asset from which to profit. A comprehensive rail network is needed, and this needs to be planned.

6. The contribution of air transport to pollution in Australia and in the Sydney basin in particular needs attention, particularly with opening of Badgery’s Creek airport in a low-lying part of the basin. Clearly a better rail network and a very fast train to Melbourne and Brisbane could lessen the number of flights, and would be a major saving of both energy and air pollution.

7. The coal industry needs to be phased out. There needs to be:
   a. No new coal mines in NSW
   b. No subsidies to coal in terms of freight or port infrastructure
   c. A carbon Load-Based Licencing (LBL) scheme that makes polluters pay a realistic amount for their pollution, then recognition that coal-fired power stations have a low cost base because if existing transport and plant infrastructure, which distorts their real cost.
   d. No subsidies to the much-vaunted coal research or carbon capture schemes that appear to exist merely to give reasons for not acting to change the status quo of coal use.
8. Coal Seam Gas must also be banned as it gives rise to huge but unquantified fugitive emissions of methane and carbon dioxide as well as being immensely harmful to groundwater quality.

9. There must be a real transfer to renewable energy including wind, solar and possible sites for tidal and wave power. Batteries must be investigated for evening the power supply, which will also lower peak prices. Incentives for renewable must be at the time of installation, not like the previous NSW scheme which simply paid more later.

10. The change to electric cars has been greatly delayed by the lack of a network of charging stations. Estonia has introduced these, and there is no reason why NSW could not. Significant numbers of plug-in electric cars will not be bought in the absence of a charging network, and if this is not to be introduced by government it may need the same sort of incentive to install the technology as new solar needs. It would be better if existing service stations had this, as clearly they will lose the business as petrol cars decline. Car parks may need encouragement, but market forces would give them a competitive advantage as the cars are there for a period already.

11. Electric cars could save a huge amount more pollution if they were powered from renewable sources, which may be possible as most car users leave cars for periods during the day when solar is available. It must also be noted that unused power in car batteries could be used to power the evening peak and then night power to recharge the car. Rules allowing more flexible electricity use must be instituted despite the venal pleas of existing electricity interests.

12. Electricity regulation needs to be changed to allow more flexible sale of electricity. If owners of solar panels could sell to their neighbours there would be better use of solar panels and as the payback period fell, uptake would increase. In multi-dwelling units, some will not have access to sun, so this sharing is a win-win for consumers and the environment and must not be stopped by vested interests in the electricity industry.

13. Wood heaters need to be banned as these are an important cause of air pollution in urban areas.

14. Cycling networks must be developed, but it must be recognised that cycling currently is not safe. If roads close to major arterial roads were developed for cycling and made so that only residents could access these non-major roads, it would allow a huge growth in cycling. The lack of development of cycling is a result of it not being taken seriously as an alternative means of transport for significant numbers of people. Storage facilities at railway stations would be a valuable addition; it is absurd that there are car parks but no bicycle storage which takes a fraction of the amount of space.

15. The monitoring of air pollution needs to be close to sources of pollution to see what effects these are having. When there was an oil spill at Gore Bay from the Laura D’Amato on 3 August 1999 the local monitoring was south of the spill so did not register as it was a southerly wind. Monitoring of polluting or potentially polluting sites needs to under the control of the EPA, not ‘self-regulation’ and the sites and nature of the monitoring needs to be able to capture data in real time.

16. The PM2.5 particles are the most significant particle pollution and this must be monitored. The Nox, and Sox should be managed by taxes or capturing at source to the greatest level possible and by site monitoring by EPA. VOC in aerosols needs to be managed by regulations or taxes lessening the use of pressure packs when they are not needed.

Summary:
Air pollution is part of the abuse of resources on the planet. Air pollution this can be much reduced at source by decisions on resource use, urban and transport planning. The government must ban domestic wood heaters, approve no new coal mines, phase out the use of coal and coal seam gas and actively encourage the transfer to renewable resources. The government must also encourage and actively create infrastructure resources for electric cars and bicycles. Electricity regulations must allow for more flexibility of selling of power to allow more embedded generation and use of solar power and battery storage. Monitoring must be by EPA, not self-regulation.

Sincerely
Dr Arthur Chesterfield-Evans