The Clean Air for NSW Consultation Paper acknowledges that:
1. in Sydney, wood smoke contributes 47% of annual PM2.5 particle pollution and up to 75% of particle emissions in July
2. wood smoke can cause breathing difficulties, respiratory disease and cardiac problems
3. the health costs of wood smoke emissions in NSW are estimated to be $8.1 billion over 20 years.

However, the only action proposed is to adopt updated AS/NZS emissions standards for wood heaters.

This action on its own is grossly inadequate because the AS/NZS emissions standards are set by reference to idealised laboratory conditions and emissions in real-life conditions are multiple times higher. The “Wood Smoke Control Measures” report produced for the NSW EPA acknowledges that the emissions rate is underestimated by at least a factor of 2. Recommendations by a Standards Australia committee to improve the test to better reflect real-life conditions were vetoed by the wood heater industry.

Mandating the AS/NZS emissions standard also does not stop wood heater use from increasing and may even encourage it by misleading consumers into believing the level of emissions is safe because it is an AS/NZS Standard endorsed by the government. There is no health warning on wood heaters to tell consumers otherwise.

The EPA’s Discussion Paper “Options for wood smoke control in NSW” estimated the net benefit for banning the installation of new wood heaters at $2.07b. This is a simple option that does not affect existing users. It needs to be made mandatory in urban areas, where wood heaters are unnecessary and disproportionately large numbers of people are adversely affected by the pollution from a single wood heater.

The Consultation Paper states that it is up to local councils to implement controls on wood heaters. This approach has already failed, which is why the wood smoke problem continues unabated. Councils in general have neither the expertise, resources or will to deal with this complex public health issue. The government needs to, at a minimum, ban new installations of wood heaters and open fireplaces in urban areas. If it is simply left to the Councils as before, nothing will change.

In other areas, new installations of wood heaters should not be automatically allowed as exempt and complying development (as is generally the case at the moment). Council approval should be required to install a wood heater and public notice given so that neighbours who may be adversely affected can object. If any neighbour has reasonable objections, the wood heater should not be allowed. It is most effective to identify problems at inception rather than subject vulnerable neighbours to dangerous pollution and allow disputes to escalate when the wood heater has already been bought and installed.

At the moment, there is no message from the government that wood smoke damages health in the same way that everyone is made aware that “Smoking Kills”. People have the right to use wood heaters and the only message given is that they should operate them correctly. If a neighbour suffering from wood heater smoke complains to the Council, the Council will just ask the wood heater owner to operate it correctly. Correct operation of a wood heater may reduce excessive smoke but it does not stop emission of the PM2.5 particles that penetrate the bloodstream through the lungs and are most damaging to the neighbour’s health. The concept
of “polluter pays” has not been applied in the slightest and the only person who pays is the neighbour with his health and perhaps ultimately, his life. Where is the justice in this?

A balance needs to be struck between the interests of the wood heater industry, wood heater owners and the rest of the community who suffer the pollution and pay for the health costs. Currently all rights are firmly in favour of the wood heater industry and wood heater owners. The wood heater industry sets its own standards and has the right to veto recommendations made by others on the Standards Australia committee. Wood heater owners have the right to install and operate wood heaters without neighbours having any right to object. It is the government’s duty to protect the health of the public. If all that the government does is endorse the flawed standard set by the wood heater industry, it is effectively washing its hands of the matter. It would be a gross dereliction of duty.

I live in Sydney and can’t go out after dark in winter because of wood heater pollution. It gets in my house despite taping shut all the windows. It makes me ill and restricts my life. The only remedy available is to ask for a smoke abatement notice, which requires evidence of a certain amount of visible smoke over a certain time from one chimney. This evidence is impossible to obtain in the dark, which is when the pollution occurs. It also does not take into account the cumulative impact of smoke from more than one house. It is a crude and primitive test which does not consider the impact of the invisible PM2.5 particles.

The NSW Chief Medical Officer, Kerry Chant, stated that wood heaters are so detrimental to health that she supports banning and phasing them out in urban areas. The ban I have suggested only relates to new installations. With regard to existing wood heaters in urban areas, the government should offer to cover the cost of removal of the wood heater as well as subsidise the cost of replacement heating (in cases where the wood heater was used as the main form of heating). The funds for this could be provided by the government in view of the expected health cost savings to be achieved, or preferably, in accordance with the principle of “polluter pays”, derived from a levy on wood heaters or on solid fuel (net benefit estimated at $1.28b and $0.45b respectively in the EPA’s Discussion Paper “Options for wood smoke control in NSW”). In any urban area where a neighbour is adversely affected by wood smoke and the problem has not been resolved, the wood heater user should be asked to remove his wood heater at the government’s cost and a subsidy provided towards replacement heating if appropriate.

The government needs to run campaigns on the health dangers of wood smoke which reach as wide an audience as anti-smoking campaigns. It needs to break out of the chicken-and-egg situation where it is reluctant to take action on wood smoke due to perceived lack of public support but the lack of widespread support is itself due to the fact that the government has not invested in high-profile education programs to make the public aware of the health dangers of wood smoke.

Wood fires have the image of being cosy and natural. The public are not told that the smoke is more carcinogenic than cigarette smoke. They are led to believe that a wood heater is only polluting when it emits large amounts of visible smoke although it is actually the invisible PM2.5 particles that are the most damaging because they are small enough to enter the bloodstream through the lungs and travel to every part of the body. Most people believe that wood smoke at most causes temporary respiratory distress and are not aware that it also leads to increased risk of cardiac disease, cancer and stroke.
In summary, the government needs to:

1. ban new installations of wood heaters and open fireplaces in urban areas
2. in other areas, require public notice and Council approval for new installations of wood heaters, with a right of veto being given to any neighbour with a reasonable objection
3. establish a fund to cover the cost of removal of existing wood heaters in urban areas and subsidise any necessary replacement heating, especially in cases where there are unresolved disputes between wood heater users and their neighbours
4. invest in hard-hitting campaigns to make the public aware of the carcinogenic and other health risks posed by wood smoke (in particular, that the danger lies not just in visible smoke but even more so in the invisible PM2.5 particles) and encourage wood heater owners in urban areas to remove their wood heaters and take advantage of the funding offered by the government

These are reasonable, practical, fair and effective suggestions, which provide a ban on new installations in urban areas, where wood heaters are least appropriate. Existing owners are not forced to give up their wood heaters but are persuaded to do so through high-profile education campaigns coupled with funding to cover the costs of removal.

The government so far seems more inclined to protect the wood heater industry rather than the wider public whom it represents. Victims of wood heater smoke have been denied any semblance of justice or fairness for too long. If the government does not impose any bans on new installations, not even in denser urban areas, the public will just assume wood heaters are safe and nothing will change. It is time to get the message through: WOODHEATERS DAMAGE HEALTH.

According to Figure 6 in the Consultation Paper, wood heaters are by far the biggest source of PM2.5 emissions in Sydney. Wood heaters are least appropriate in dense, highly populated metropolitan areas like Sydney. Only a small minority of residents use them, yet they contribute the most pollution. Let the ban on new installations begin in Sydney. It will be the simplest and most cost-effective contribution to achieving clean air in Sydney.