CLEAN AIR FOR NSW – CONSULTATION PAPER

Submission from William Thomson of NSW.

16 December 2016

I note the contents of the Consultation Paper and thank you for the opportunity to comment.

I also note the paper’s preamble declaring that the government’s goal is to improve AVERAGE AIR QUALITY. With respect, while even a modest improvement may look good on paper and allow our politicians to declare that they have made our good clean air even cleaner it will, in all probability, do little to improve the health outcomes for the tens of thousands of people living next to the very high concentrations of toxicants emitted by domestic wood fires, vehicles at major road intersections and the like.

An average reduction in pollution measured at a few scattered sites is also very unlikely to give the guidance required to eliminate the point source “hot spots” that will be the primary contributors to the respiratory and cardiovascular events that result in the 520 premature deaths and the $6.4 billion health costs for the Greater Metropolitan Region.

So, to answer the questions posed on p4 wrt “other issues and actions” I would suggest that the primary focus for the 10 year plan should be to map and identify high pollution hot spots, to site monitoring stations in these locations, and then to work through a process of state mandated regulations leading to clear and binding legislation designed to eliminate the causes of the high pollution in these locations. I submit that if this is done the average air quality will look after itself and the state’s health costs will fall, significantly.

My main concerns, as an individual, are the adverse health consequences of inhaling wood fire pollution (WFP), especially at the very high concentrations experienced by those who live nearby wood burning heaters (even the compliant ones operated under ideal conditions).

Based on ABS figures, 320,000 homes in the greater Sydney region would be situated adjacent to the 80,000 homes which use wood burning fires as their primary source of heating. This means that the some 860,000 persons are potentially exposed to the very high concentrations of PM2.5s and other combustion toxicants emitted by these heaters, on most nights, during the extended winter months. If the residents of the house emitting the pollution are included, this number increases to 1,076,000.
Knowing that WFP can trigger asthma attacks and allowing that asthma sufferers make up about 11% of the population, we find that some 118,000 sufferers are likely to be directly exposed to high levels of wood fire pollution throughout the winter period. If we add the 3.9% of COPD sufferers the number at risk of a WFP induced, acute event increases to 160,000. This is a very substantial number of people who are at risk of an adverse medical event that may require hospital emergency treatment.... every night during the colder months.

My own experiences, living next door to a compliant wood burning appliance, which is probably operated in accordance with EPA guidelines, is that, on cold still nights the PM2.5 concentrations around our family home regularly exceed 100ug/m3 and can reach 170ug/m3. The average outside our main entrance door, on such nights, is around 65ug/m3. This is more than enough to trigger an asthma attack in my wife. And, we are just one of the 320,000 homes subjected to such extreme pollution ....almost daily, in winter.

Since more than 70% of the night-time winter PM2.5 pollution in the Greater Sydney Region (GSR) is generated by domestic wood burning fires and as the installation of these appliances is increasing, it is surely clear that the 10 year plan should include:

- an immediate, state mandated and policed, prohibition of the installation of any new wood or biomass burning appliances in the GSR and all other urban, built up areas in NSW
- the immediate, state mandated an policed, prohibition of back yard burning, including fire pits, wood fired pizza ovens and the like, in all urban areas.
- a target date for the phasing out of all existing domestic wood heaters in urban areas . Say 7 years hence
- buy-back incentives, designed to encourage existing wood fire users, in urban areas, to convert to gas, electric heat pumps, ethanol heaters or solar assisted storage heaters.
- a revised State standard for wood heaters to be used in non urban areas. Suggested 70% efficiency with emissions of less than 0.5g per kg of wood burnt, effective March 2020

The Greater Sydney commission is planning for “at least 725,000 additional dwellings across Greater Sydney over the next 20 years” enough to house another 2 million people.

Surely, now is the time to ensure that a minimum of these new residents will be exposed to WFP by mandating that all new residential precincts are to be “no biomass burn zones” and by moving quickly to prohibit the installation of any new or replacement domestic wood or other biomass burning appliances in the Greater Sydney Region.
According to your own publications such measures will save many $ billions in health costs over the next ten years, save thousands of lives and greatly reduce the suffering and misery of the tens of thousands who may otherwise be forced to breathe highly polluted air.

Please resist the temptation to continue fiddling with this high priority health issue, ignore the AHHA and FAA lobbying and take real steps to rid our urban built up areas of toxic Wood Fire Pollution.