Dear EPA and Minister Speakman,

Thank you for the opportunity to make comments on the Clean Air for NSW Consultation Paper. I am currently living in New Zealand (rurally since NZ towns are polluted by winter woodsmoke), but I wish to return to live in Australia, to a provincial city in NSW or Qld. I live in fear of being exposed to wood smoke pollution again.

I have had a long time interest in urban air issues since I was forced out of my home in Adelaide by my neighbour's supposedly "clean" wood stove in 2001. My story is similar to others'. A neighbour pollutes, and is asked not to, and they become beligerent, so complain to council, and the council environment officers are clueless on wood smoke issues (and often scientifically illiterate) and do nothing.

Recommendation #1: Council environmental officers need to be trained to understand the harm of woodsmoke pollution.
Recommendation #2: By law the AHHA should not be allowed to participate in domestic wood smoke complaints, and personal information should not be supplied to them.
Recommendation #3: Ban wood burning in all residential areas.
Recommendation #4: Empower local councils to ban wood burning and to order people to remove woodstoves that cause pollution.
Recommendation #5: Ban the installation of any new wood stoves.

I wish to draw your attention to each and every scientific paper which has been collected at this site: http://woodsmokepollution.org/references.html
I wish for each of the referenced studies to be printed out and submitted as part of this consultation process, and each one should be part of the public record of what we know about the science of wood smoke pollution in 2017. The science of the harm of wood smoke is definitive. It cannot be denied.

The sum of scientific knowledge is that wood smoke and the chemicals found in woodsmoke are toxic. Wood smoke is carcinogenic, cardiotoxic, mutagenic, teratogenic and highly unpleasant. Woodsmoke kills through strokes, heart attacks, lung cancer, leukaemias, COPD, premature births, still births, sudden infant death and more. Wood smoke kills thousands of Australians every year. We should treat wood smoke like we treat asbestos. It should not be present in our environment.

The economic costs of each wood stove is over $2000 annually, just in externalised health costs. Wood smoke pollution costs hundreds of millions dollars each year. It makes economic sense to ban wood stoves completely. These costs are borne across the community, but caused by a small percentage of homes. The people who are doing the polluting are doing way more than their fair share.

It is also worth noting that the costs of wood smoke pollution are experienced by some people way more than others. Pollution can be patchy. Monitoring of air pollution does not always give good results. I could live 2 streets away from a monitor that says it is getting 15ug/m3 and be getting
800ug/m3 or more because I'm just downwind of a flue.

Monitoring is expensive, even with today's cheaper monitoring, but there is far too little monitoring going on. I suggest more monitoring be installed in schools, since they are ubiquitous and are mostly in residential areas.

Recommendation #6: Every school in New South Wales should be fitted with particulate pollution monitoring of PM10 and PM2.5s.

The overwhelming evidence is that wood smoke should be banned completely from every residential district in New South Wales. Failure to act to do so is misgovernance and political cowardice.

The marketing of woodstoves is fraudulent in exactly the same way that the VW diesel scandal was. Real world emissions are way higher than advertised and way higher than lab testing suggests. Wood stove manufacturers should be forced to recall their faulty products and subject to punitive damages.

It should therefore be recognised that there is no such thing as a "clean" woodstove. They are all too polluting.
It should be recognised that new for old schemes fail to work in the real world.
It should be recognised that no after market products such as scrubbers, or clean burn logs work in the real world.
It should be recognised that no "clean burn" education programme has worked more than a trivial amount.
It should be recognised that "clean burn" education programmes are the wrong message, as they real message should be to not burn wood (or any solid fuel) at all.
It should be recognised that no voluntary scheme works well enough.
Prohibition of wood burning should be mandatory. And I'd go so far to say, that due to the documented harm that wood smoke does, burning wood in a residential area should be criminalised. Presently it is the most deadly of legal activities allowed under law.

The Australian Standards committee that determined the last round of the emissions standards was corrupted by the presence of the Australian Home Heating Association and all public submissions that supported public health rather than wood smoke pollution industry profits were ignored. The Standards committee should be reconstituted without the presence of the AHHA and told to do their job properly. An opportunity to control emissions was wasted.

Recommendation #7: Revisit the Australian standards for allowable emissions from solid fuel burning stoves, and revisit the Australian standards for ambient particulate pollution levels.

Recommendation #8: The standards current ambient PM2.5 levels are revised down to actual proven safe levels. Each 5ug/3 rise in PM2.5s increases stroke risk by 14% so how is 25ug/m3 deemed to be safe?

A full ban is definitely needed in every residential district and closely settled rural district, but if not then the right of a neighbour to veto being polluted must be established. So a neighbour should be able to stop any pollution source just by saying so. The onus and costs of proving it is annoying should not be on that neighbour.
Recommendation #9: Enshrine a right for a neighbour to veto a pollution source.

Also to protect rural air rural burnoffs need to be completely banned. In my experience rural woodstoves, as long as they are far enough (500 metre or more) away are rarely a problem, but rural neighbours do need to hold a right of veto to shutdown all pollution sources.

Recommendation #10: Ban rural burnoffs.

If people are forced, or have been forced from their homes by wood smoke pollution then they should be compensated from a fund that wood stove owners, wood stove manufacturers, and firewood retailers should be forced to pay into.

Do the right thing, that the science supports, and ban wood burning.

Thank you,
Matthew Thredgold

Kind regards,
Matthew Thredgold

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