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NSW Environment Protection Authority
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Re: Clean Air for NSW consultation paper

Total Environment Centre (TEC) is deeply disturbed by the NSW Government's Clean Air for NSW consultation paper. We are particularly disturbed that the consultation paper represents a series of ultimately vague statements of intent and possible actions. The paper lacks clear, assessable actions and targets against which progress could be measured. In its current form the consultation paper represents a serious diminution of the current *Action for Air* actions and targets.

While the consultation paper provides useful information on air pollution problems, their impact and the scale of the challenge presented it does not provide effective strategies for meeting these challenges. TEC strongly believes that the minimum starting point for any clean air strategy should be to update and strengthen *Action for Air* actions and targets. Detailed comments on goals and actions in the discussion paper are provided below.

Reducing industry emissions

TEC supports the use of Load Based Licencing (LBL) as a mechanism for reducing emissions from industry. We welcome the objective to strengthen and better target the scheme to improve its effectiveness in managing air pollution. More detail is needed in the consultation paper on how this will be achieved. We note that the review of LBL will consider providing incentives for licensed facilities with high impacts to reduce emissions. TEC strongly believes that introducing such incentives should be prioritised. Further, licence fees should genuinely reflect the environmental impacts of emissions by including externalities in the determination of fees.

Power plant emission reductions

The goal of reducing primary and secondary emissions from power stations is welcomed; however the consultation paper lacks firm commitments on how this will be achieved. The consultation paper notes that the United States, Europe and China have successfully introduced standards for power station SO₂ and NO_x emissions. We strongly believe that these or better standards should be adopted in NSW.

Strengthening the rehabilitation framework

The consultation paper notes that the NSW Government *could* develop a policy and updated rehabilitation framework that clearly sets out obligations for post-mining final land-use. We see no reason why this should not be done as a matter of priority. TEC wishes to state strongly, however, that mine site rehabilitation should not be used for biodiversity offsets.

Manage dust emissions in the Hunter rail corridor

The health and environmental impacts of dust emissions in the Hunter rail corridor are a source of serious and growing public concern. TEC strongly believes that stringent targets and controls (including requirements to cover coal loads) should be introduced to reduce emissions.

Development of a NSW electric vehicle strategy

TEC believes that a strategy to encourage the uptake of electric vehicles would be an important contribution to reducing emissions from motor vehicles in NSW. We are disappointed that the consultation paper commits only to *examine* policies and incentives that could be adopted to encourage business and individuals to switch to electric vehicles. The NSW Government should commit to introduce such policies and incentives. This should include rebates on registration costs for electric vehicles and registration fees that better reflect emissions from non-electric vehicles (e.g. charges that vary according to kilometres travelled and vehicle emission levels).

Investigation of vehicle emission standards for NSW Government contracts

Government purchasing and contracting decisions offer a powerful means of driving reductions in vehicle emissions. In view of this we strongly believe that consultation paper should commit the NSW Government to adopt these measures rather than merely *investigate* them. The emission standards proposed for investigation should be adopted immediately. All vehicles operated by or under NSW Government service contracts required to meet them.

Minimise non-road diesel emissions

The consultation paper notes that the EPA is investigation and developing requirements for non-road diesel equipment and locomotives. This should be completed and implemented as a matter of priority. This should also include emissions from shipping and include greater use of ship to shore power to enable berthed vessels to switch off their diesel engines.

Petrol vapour recovery requirements in regional centres

TEC strongly supported the introduction of VR1 and VR2 requirements under the *Action for Air* strategy. We strongly support the proposal to extend VR2 requirements to regional centres. We are concerned that the consultation paper does not set clear timelines for this to occur. We urge the NSW Government to set dates for the introduction of this important public health measure.

Wood smoke reduction

Wood heaters are a major contribution of fine particle pollution. Collection of firewood also causes significant environmental impact due to loss of habitat when fallen timber is removed from the environment. In view of this we see little merit in allowing wood heaters to be sold in NSW. We call on the NSW Government to prohibit the sale of wood heaters in NSW and to

provide incentives (such as buy backs) to owners of wood heaters to convert to cleaner heating methods.

Small domestic petrol-powered equipment program

TEC recognises that the NSW EPA has devoted considerable time and effort to the issue of emissions from small engines. We also recognise that emission standards need to be developed and introduced at a national level. Nevertheless the NSW Government should immediately adopt the measures proposed in the consultation paper including free scrappage of old equipment and incentives to purchase low emission or emission free equipment.

Reduce health impacts of hazard reduction burning and other open burning

TEC recognises the importance of hazard reduction burning in managing bushfire risk. Nevertheless smoke from hazard reduction burning can cause serious health impacts. We strongly support the measures proposed in the consultation paper and urge the NSW Government in to implement them as a matter of priority.

Energy productivity in the transport sector

TEC supports the proposed actions to promote cleaner vehicle use, reduce road congestion and increase public transport use; however, there is a disturbing lack of detail on how this will be achieved. Despite significant progress on some *Action for Air* commitments, curbing vehicle use and enhancing public transport have been notable policy failures. We strongly urge the government to revisit and update both *Action for Air* and *Action for Transport* targets and strategies. Clear targets and timelines for public transport improvements and preventing increases in Vehicle Kilometres Travelled (VKT) should be established. Unless this occurs any clean air strategy will be doomed to lose momentum and fail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Angel', written in a cursive style.

Jeff Angel
Executive director