



NSW Clean Air Regulation

CAHA submission in response to the
draft Protection of the Environment
Operations (Clean Air) Regulation 2022

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Contact

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About the Climate and Health Alliance

The Climate and Health Alliance (CAHA) is a national charity and the peak body on climate change and health in Australia. CAHA is an alliance of organisations within the health sector working together to raise awareness about the health risks of climate change and the health benefits of emissions reductions.

The membership of CAHA includes a broad cross-section of health sector stakeholders with 90+ member organisations, representing healthcare professionals from a range of disciplines, as well as healthcare service providers, institutions, academics, researchers, and consumers.

The Climate and Health Alliance has produced a significant number of reports and publications to assist policymakers and inform health stakeholders and the wider community to understand the links between climate change and health, and to guide decisions regarding policy and solutions. These include Healthy, Regenerative and Just - A Framework for a National Strategy on Climate, Health and Well-being for Australia; Human Health and Wellbeing Adaptation Plan for Queensland; Climate Change and Australia's Healthcare Systems for the Royal Australasian College of Physicians; Real, Urgent and Now: Guide to climate and health communications and a report from a national survey of healthcare professionals on climate change and health; and more.

CAHA also supports Australian and New Zealand health services and organisations - including the majority of health service providers in WA - to strengthen their resilience and reduce their ecological and carbon footprint via the Global Green and Healthy Hospital Network. CAHA also contributes to many conferences, community dialogues, and forums, both nationally and internationally on these issues.

For more information about the membership and governance of the Climate and Health Alliance, see www.caha.org.au.

Introduction

The health impacts of air pollution have been well documented. The World Health Organization classified air pollution as a major threat to health, and has recently updated its WHO Air Quality guidelines, adjusted the levels for almost all air pollutants downwards, and warning that exceeding the new air quality guideline levels is associated with significant risks to health.

The health risks associated with exposure to particulate matter (PM), for example, include respiratory and cardiovascular morbidity, such as asthma, respiratory symptoms and increased hospital admissions, and mortality from cardiovascular and respiratory diseases and from lung cancer.

The work to update the Clean Air Strategy for NSW (the 'strategy') is welcome and necessary.

While previous studies mostly referred to global and international data documenting the impact of air pollution on health, more recent studies include data for Australia and New South Wales. This data indicates that urgent action is required.

The Climate and Health Alliance welcomes the opportunity to provide input to this process, and is broadly supportive of the three main proposals outlined in the strategy, to:

- Extend the summer period when less polluting petrol must be supplied in the NSW Greater Metropolitan Region.
- Require older activities and plants to comply with more stringent air emission standards.
- Require stricter emission limits and controls for volatile organic liquids for storage tanks, loading plant and tank vehicles and across a broader part of the NSW Greater Metropolitan Region that is at high risk of ozone formation.

Below we outline some additional feedback on the Clean Air Strategy.

Feedback on the Strategy

Common components of air pollution in Australia include: nitrogen dioxide, sulphur dioxide, ground level ozone, and particulates.

Coal-fired power stations and motor vehicles are the main sources of sulphur dioxide and nitrogen dioxide respectively, in Australia. Diesel powered vehicles emit a much higher amount of nitrogen, compared to petrol vehicles

Peer-reviewed studies on air pollution impacts in Australia put the number of premature deaths from air pollution in Australia per annum at between 2,616 and 4,884 at an estimated economic cost of up to AUD \$24 billion per year.

Coal-burning power stations are a significant contributor to fine particulate pollution across NSW, and the largest contributor in the summer period, and studies have estimated that air pollution from these coal power stations causes 477 premature deaths, 7,582 episodes of asthma symptoms in children and 419 premature births every year.

CAHA believes **stronger pollution limits** need to be in place **for coal power stations** across New South Wales, to be more closely in line with existing pollution limits in other developed countries. We strongly believe there should be **no exemptions granted for the new limits**, as proposed in this strategy, since industry and coal-burning power stations are already being given until 2025 to 'phase in' the limits.

The government should **adopt the World Health Organization guideline values for air quality**. WHO's new guidelines recommend air quality levels for 6 pollutants, where evidence has advanced the most on health effects from exposure. When action is taken on these so-called classical pollutants – particulate matter (PM), ozone (O₃), nitrogen dioxide (NO₂) sulfur dioxide (SO₂) and carbon monoxide (CO), it also has an impact on other damaging pollutants.

Lastly, CAHA would also like to see a stronger reflection of the fact that **transport** is a major contributor to air pollution in NSW. Reducing the health consequences of transport pollution requires **reduction of overall traffic emissions**. The measures outline in part 3 of the strategy go some way in addressing this, but can be improved on several fronts, including by strengthening vehicle emissions standards, strengthening the petrol volatility limits for vehicles, and limiting the number of exemptions available to certain vehicles.

Appendix: Climate and Health Alliance Members

CAHA membership as at May 2022.

Abilita
Arriba Group
Asthma Australia
Australasian College of Health Service Management (ACHSM)
Australasian College of Nutritional and Environmental Medicine (ACNEM)
Australasian Epidemiological Association (AEA)
Australasian Society of Lifestyle Medicine (ASLM)
Australian Association of Gerontology (AAG)
Australian Association of Social Workers (AASW)
Australian Chiropractors Association
Australian College of Nursing (ACN)
Australian Council of Social Service (ACOSS)
Australian Federation of Medical Women (AFMW)
Australian Healthcare and Hospitals Association (AHHA)
Australian Health Promotion Association (AHPA)
Australian Indigenous Doctors' Association (AIDA)
Australian Institute of Health Innovation (AIHI)
Australian Lesbian Medical Association (ALMA)
Australian Medical Students' Association (AMSA)
Australian Nursing and Midwifery Federation (ANMF)
Australian Physiotherapy Association
Australian Podiatry Association (APodA)
Australian Primary Health Care Nurses Association (APNA)
Australian Psychological Society (APS)
Australian Women's Health Network (AWHN)
Brooke Shelton - Perinatal, Child & Family Counselling
Cairns Hand Clinic
Central Australia Rural Practitioners Association (CARPA)
Children's Healthcare Australasia
Climatewise Design
Codesain
CoHealth
ConNetica Consulting
Consumers Health Forum of Australia (CHF)
Coota Girls Aboriginal Corporation
CRANApplus
Cultivate Impact
Dietitians Australia
Doctors for Nutrition
Doctors Reform Society (DRS)

Enliven Victoria
Enriching Lives Psychology
Environmental Health Australia
Faculty of Health, University of Technology Sydney
Food for Thought Consulting Australia
Friends of CAHA
Health Care Consumers' Association ACT
Health Consumers NSW
Health Issues Centre (HIC)
Health Nature Sustainability Research Group (HNSRG)
Health Services Union (HSU)
Healthy Futures
Indigenous Allied Health Australia
Inner East Primary Care Partnership (IEPCP)
Institute for Sustainable Futures, University of Technology Sydney
Kooweerup Regional Health Service (KRHS)
Lowitja Institute
Medical Association for Prevention of War (MAWP) Australia
Medical Scientists Association of Victoria (MSAV)
Metta Health & Psychology
MinterEllison
Motion Energy Group
Mott MacDonald
National Association of Aboriginal and Torres Strait Islander Health Workers and Practitioners (NAATSIHWP)
National Rural Health Alliance
Naturopaths and Herbalists Association of Australia (NHAA)
NSW Nurses and Midwives' Association (NSWNMA)
Nutrition Australia
Optometry Australia
Pharmacists for the Environment Australia (PEA)
Psychology for a Safe Climate (PSC)
Public Health Association of Australia (PHAA)
Queensland Nurses and Midwives Union (QNMU)
Royal Australasian College of Physicians
Rural Doctors Association of Victoria (RDAV)
SANE Australia
School of Public Health, University of Sydney
School of Public Health & Social Work, Queensland University of Technology
Second Chance Psychology
Services for Australian Rural and Remote Allied Health (SARRAH)
Veterinarians for Climate Action (VFCA)
Victorian Allied Health Professionals Association (VAHPA)
Vote Earth Now
Weenthunga Health Network
Women's Health East (WHE)
Women's Health Goulburn North East (WHGNE)

Women's Health in the North (WHIN)
Women's Healthcare Australasia