

Clean Air Regulation 2022
June 2, 2022

Re: Public Consultation concerning the NSW Clean Air Regulation 2022

Dear Sir/Madam,

I am writing to you on behalf of the Environmentally Concerned Citizens of Orange (ECCO). We are a not-for-profit group of volunteers who have been a local advocate for the environment since 2006.

During this time ECCO has been campaigning for air quality at local, state and national levels. We welcome the opportunity to comment on the draft 2022 Clean Air Regulation. Of particular concern for our community is the regulation of woodfired heaters. Orange is located in one of the coldest regions in NSW. As such, there is a reliance on wood fired heating in the winter months. We remain concerned that the operation of wood fired heaters causes dangerous local air pollution. We would like to see greater regulation for this issue. Also, although not affected directly at a local level, we are concerned about the continued effect coal fired power stations are having on both local communities and air pollution globally. We would like to see changes to regulations that causes pollution levels from such infrastructure be regulated to achieve levels which are healthy and in line with those imposed by other counties.

Research continues to point to the harmful impacts caused by fine particle exposure caused by burning wood and coal. Research tells us that there is no safe level of exposure to air pollution. It is the responsibility of Government to ensure that the public is protected from its harmful effects, which include nitrogen dioxide and Sulphur dioxide. Continued exposure to these chemicals through fine particle air pollution include low birth weight in babies, an alarming increase in the occurrence of asthma, and over 700 cases of premature death each year. If Government is to protect the public from harm cause by air pollution, it is necessary for it to enact legislation that will effectively control its harmful effects. It is therefore disappointing that the current draft regulation will require significant improvement before it does so.

Nations through the world have been active in curbing air pollution for several decades. Countries such as the US, the EU, south Korea, Japan and China have been active in requiring increasingly effective pollution controls for particle matter, nitrogen oxides, sulphur dioxide and mercury. In some cases, The limits imposed by NSW are many times lower than those imposed by such countries as the EU. Such comparably low standards are unacceptable in a developed country such as Australia, especially as there are technologies available to reduce pollution from coal fired power stations and other forms

of fuel burning for heat and energy. Such technologies as low nitrogen oxides burners, wet scrubbers or selective catalytic reduction methods are available and can be mandated in regulation.

Stricter standards in line with other nations need also to apply to local domestic and industrial air pollution. This is necessary to ensure that the legislation is reflective of scientific research when it comes to imposing regulations, incentives, monitoring and enforcement in local communities such as ours.

The proposed Clean Air Regulation has a timeline which will require our biggest coal fire emitters to eventually move to higher standards. These timelines are 2025-2030. This is leaving transition to clean air much too late if we are to avoid the impacts of high levels of air pollution.

It is unacceptable that the current draft regulation allows for polluters to apply for exemptions. Regulation should be providing an incentive for all polluters to either install appropriate technology as soon as possible, or, preferably to move to a non-polluting source of heat or energy. Any regulation that provides get out of jail cards for big polluters is not focusing on its main objective, which is to protect the health of our community and the health of our planet. We cannot afford a Clean Air Regulation that protects the polluters at the expense of the public.

ECCO thanks you for the opportunity to comment on the NSW Clean Air Regulation 2022. We commend the Government for identifying air pollution as an issue which needs to be addressed. We hope that you will give due consideration to the concerns expressed in our submission.

Yours sincerely

Neil Jones President, ECCO