

**3 June 2022**

**NSW Environment Protection Authority (EPA)**

**By email: [air.policy@environment.nsw.gov.au](mailto:air.policy@environment.nsw.gov.au)**

**AHHA Submission regarding the Regulatory Impact Statement on the Proposed Clean Air Regulation 2022**

We are writing to you in response to your request for industry feedback on the draft Clean Air Regulation 2022.

We would like to acknowledge our appreciation for the consultation process that has been undertaken by the NSW EPA thus far. As the peak industry body representing the solid fuel industry, the Australian Home Heating Association (AHHA) welcomes the opportunity to make a submission and we believe the best environmental outcomes are achieved when industry and government work closely together to develop practical regulatory solutions.

The AHHA represents manufacturers, retailers, installers, and maintenance service providers in the wood heating industry. Our members employ over 10,000 Australians nationwide.

As a general point, the AHHA strongly supports the NSW Government's objective in strengthening measures to address air quality impacts. In conjunction with proper enforcement and education, this will lead to a tangible improvement for air quality. The AHHA supports the recommendation of the existing Regulation proposed by the NSW Government. We would like to propose alternative measures and provide further comments for consideration.

### Option 1 - Domestic sold fuel heaters (Part 2 of the Regulation)

The AHHA support NSW EPA on the recommendation of Option 1 (business as usual) in retaining the current Regulation with no change to the current measures for wood smoke in NSW.

As the industry body of the solid fuel heating industry, the AHHA ensure that all our members in NSW must comply with the requirements set out in the Protection of Environment Operations (Clean Air) Regulation 2022, being:

- Have a certificate issued by a body approved by the EPA
- Compliance with AS/NZS Standards 4012 and 4013
- Ensure an overall efficiency of not less than 60% (as tested and calculated in accordance with AS/NZS Standard 4012), and
- Ensure the appliance particulate emission factor (as tested and calculated in accordance with AS/NZS Standard 4013), not greater than:
  - 1.5 g/kg for heaters without catalytic combustors, or
  - 0.8 g/kg for heaters with catalytic combustors

The AHHA will work closely with all levels of NSW Government and support the regulatory controls listed below in Figure 1.

We encourage local governments and NSW Government to introduce more wood heater replacement programs, primarily the recent program in Upper Hunter region and include a change-out scheme that can be implemented and outlines practical concerns with banning old units. We want to ensure that NSW EPA's manage the change-out program and removal of the non-compliant heater. Options for the replacement heaters should still include certified and compliant new wood heaters. The industry believes this is an excellent and proactive mix of government and industry working together towards improvement of air quality

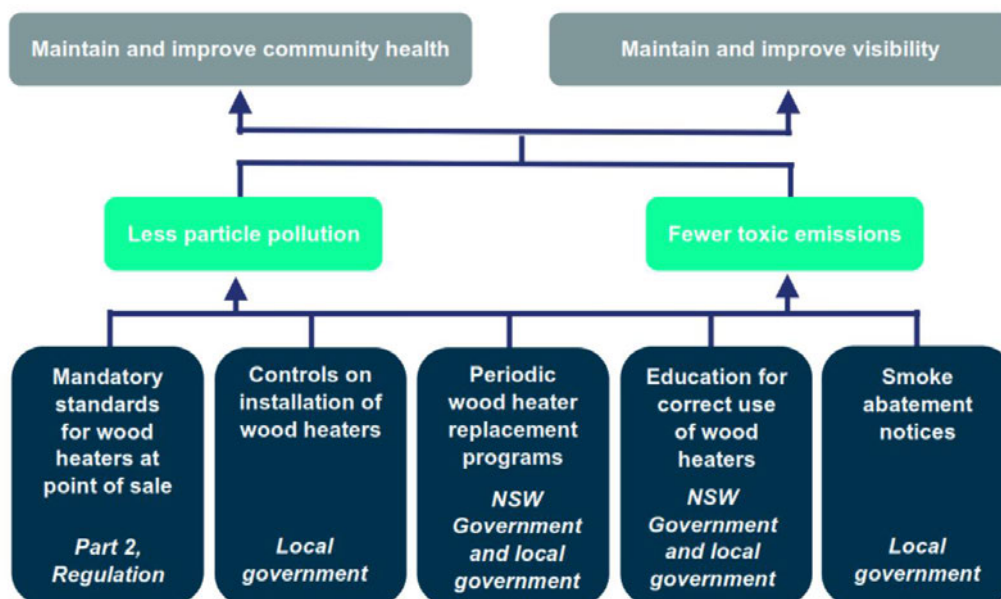


Figure 1 Management of emissions from wood heaters in NSW.

Source: DECCW (2010)

Please see below further recommendations and proposed alternatives to support the regulatory control measures.

### ***Further regulation of compliant heaters***

The AHHA is a strong advocate for wood heaters being compliant to the current standards. Members of the association have their compliant wood heaters listed for public viewing on the AHHA website along with a downloadable copy of the compliance certificate. This makes it easy and accessible for customers and regulators to see which wood heaters are compliant. If it is not listed on the website, it is likely that the heater is not compliant.

We encourage the NSW EPA to promote the Certified Wood Heaters List on our website to local governments. The AHHA ensure all members' products meet the minimum emission and efficiency standards.

There are a number of importers who bring wood heaters in, selling them online, and never get tested for compliance with AS/NZS 4012 and 4013.

One has to simply go online to see that there is a market for second hand non-compliant wood heaters as well.

The industry is committed to reducing the amount of emissions produced by wood heaters by working collaboratively with regulators and stakeholders. The wood heating industry proactively shows leadership through stringent research, testing and certification in support of its position. It is when stakeholders such as importers and second-hand sellers, who do not necessarily follow the regulations, undermine the wood heating industry.

Some of the common complaints and issues that the AHHA have dealt with are:

- Poor operation from users of wood heaters – eg. Not choosing the correct firewood, not conducting regular maintenance.
- Unqualified installers completing the installation – eg. Incorrect Installation in accordance with AS/NZS 2918 can affect the amount of wood smoke emitting from the flue.

### ***Further control on incorrect installations***

Many installers are not qualified to install wood heaters. The AHHA often identify those installers who are not certified will install non-compliant heaters. Correct in-service operations and replacement of consumable components within the wood heater are important for the heater to operate at its optimum.

The AHHA has developed an online course in conjunction with Pointsbuild - a Registered Training Organisation. This course is for those who wish to install wood heaters, service personnel and council staff who would like to understand the installation of wood heaters to enable them to better respond to complaints in a more informed manner. The details of this course can be found here <http://www.pointsbuild.com.au/ahha-installers-program>.

The AHHA strongly encourage the enforcement of more qualified installers. We believe we can achieve this by recognising the AHHA Installers Course to be a qualification. The AHHA seek your assistance and are willing to work with other regulatory bodies to achieve this outcome

The Victorian Building Authority (VBA) has strict protocols for safe installation requirements for Solid Fuel Heaters (SFHs) that in turn could be applied to the NSW. More information can be found here - [https://www.vba.vic.gov.au/data/assets/pdf\\_file/0004/98518/7.01-Mechanical-Services-Solid-Fuel-Heaters.pdf](https://www.vba.vic.gov.au/data/assets/pdf_file/0004/98518/7.01-Mechanical-Services-Solid-Fuel-Heaters.pdf)

### ***Outdoor wood burning***

There is currently no policy or regulation on the burning of solid fuel in outdoor equipment in NSW. Residents do not need approval for a backyard fire pit or barbeque.

In South Australia in the Environment Protection (Air Quality) Policy 2016 it states a person can ONLY carry out burning activities within a metropolitan council area when :

- (i) lighting or maintaining a fire using charcoal, dry wood or other dry plant material for the purpose of preparing food or beverages;
- (ii) burning charcoal (but not wood or other plant material) in a brazier, chiminea or fire pit for domestic heating;

*(Refer to Part 2 – Air quality measures, Division 1 – Burning offences, 5 – Burning in the open in council areas).*

With no regulation on the burning of wood in outdoor settings, whether that be firepits, pizza ovens, BBQ smokers, or chimineas, and no data on how much they might contribute to overall wood smoke, it is unreasonable to blame all wood smoke being generated by wood heaters.

Tighter regulation on outdoor wood burning would have an immediate impact on the wood smoke issues in NSW and the data recorded at the monitoring stations.

### **Education**

To support further consumer and regulator education, the AHHA has produced a series of [educational short videos](#) to engage and inform on the proper use of operating and maintaining a wood heater. These videos are freely available on the AHHA website and include important aspects such as using the correct firewood and how to correctly load the fire.

The AHHA has encouraged governments to consider comprehensive consumer education programs and to work with industry to achieve the desired outcomes. Such programs run by local councils in the past have proved very successful.

The wood heating industry will continue to proactively show leadership in tackling the problems of wood smoke emissions. It is in every stakeholder's interest to do so.

The major benefits of wood heating is that it uses a renewable and sustainable fuel. Many of the homes that use wood heating as their main source of heating do so because of the higher cost of alternatives such as gas or electricity. In some areas, natural gas is still not available increasing the cost even more. Wood offers a viable alternative for these families who would otherwise struggle to heat their homes effectively and keep their family warm.

For over 25 years, the AHHA has been a financial supporter of Landcare Australia and its programs. Wood heating is the only viable sustainable fuel source for home heating in Australia and the AHHA believes that Landcare Australia is an important enterprise worthy of our ongoing support.

Finally, the management of wood smoke can be broken down into a framework which allows resources to be focused on relevant areas that are going to have most impact while still maintaining the overall framework and with the ultimate aim of improving air quality.

1. Regulation and enforcement
  - Wood heater audits
  - Powers and enforcement of the Environment Protection Act
  - Smoke abatement notices
2. Education
  - Information to raise community awareness
  - Council support
  - Media
  - Education material
3. Economic incentives
  - Council grants
  - Wood heater replacement programs
  - Chimney cleaning rebates
4. Research
  - Collaboration with research bodies to understand impacts and sources
  - Better designed wood heaters.

Thank you for the opportunity to provide this submission.

If you have any further questions regarding the submission, please do not hesitate to contact us at [homeheat@homeheat.com.au](mailto:homeheat@homeheat.com.au)

Yours sincerely,



**Ashley Stride**

**Chairman of the Australian Home Heating Association Inc. (AHHA)**