

Submission on NSW POEO (Clean Air) Regulation 2022, 2<sup>nd</sup> June 2022

From Patsy Asch, [REDACTED], Armidale NSW 2350

I recommend:

- (1) raise standards of all new heaters to minimal emission levels;
- (2) wood heaters, in densely inhabited communities and cities should be banned in all new houses;
- (3) a person experiencing undesirable levels of smoke near their home, be able to request the emission level of heaters in houses close by be monitored and if they exceed a given level, decommissioned, and if replaced by an efficient electric heater, perhaps council share the cost;
- (4) or a more stringent law, requiring emissions from all current wood heaters be tested every two years and those beyond a set level decommissioned. Such a law need not apply to heaters in a house separated from others, say by a hectare.

During the 2019 bushfires, great attention was paid to air pollution. Apps were developed to allow real time monitoring of local levels of smoke. Of particular concern was the level of PM2.5 particulates.

Currently I find it difficult to monitor the PM2.5 levels in Armidale. I can look every few hours at the overall levels, which is extremely tedious, particularly as they vary according to time of day and air current. I can rely on my own perceptions. When I left our bathroom window open a crack at night this week, by the middle of the night, there was an overwhelming smell of smoke. I know that within half a block of our house, there are at least five wood fires.

If I step outside at about 7pm, on most nights the smell of smoke is mild, but if I step out after 11pm it is much stronger, suggesting the major problem is after people bank their stove for the night.

Whatever the cause, there is ample evidence that PM2.5 is damaging to health, particularly to young children, to people with compromised health and to the elderly. We have been monitoring air pollution levels in Armidale for several decades and each year in winter there are nights when the levels far exceed national set limits. In all my reading I have not found a medically recognised acceptable minimal level, and yet there is no mechanism for someone suffering to protect themselves or their community from their neighbours' heaters.

I understand that the regulation on commercial wood heaters is measured by the production company in a laboratory and does not relate to their actual emissions. We definitely need more stringent requirements. Furthermore, new houses ought to have sufficient insulation to make wood heating inefficient because once it heats a room to the desired temperature—fairly rapidly in a well insulated house—it becomes too hot because you can't turn it off and if you bank it down, you are going to increase the smoke.

Lowering PM2.5 levels will save millions of dollars in health care and save lives. Replacing wood heating with electric heating will diminish the land clearing resulting from supplying firewood. These will in turn help Australia lower our overall emissions and respond to climate change.