



Attention: NSW Environment Protection Authority  
[air.policy@environment.nsw.gov.au](mailto:air.policy@environment.nsw.gov.au)

Dear NSW EPA,

**Re: Submission from Australian Parents for Climate Action to the draft *Protection of the Environment Operations (Clean Air) Regulation 2022* (the proposed Clean Air Regulation)**

I write on behalf of over 15,000 supporters of Australian Parents for Climate Action who are extremely concerned about air pollution in NSW due to its deleterious impact on theirs and their children's health and on the natural environment.

We would like to urge the EPA to be vastly more ambitious in its standards for air pollution in the next iteration of the Clean Air Regulation.

Specifically we are concerned about the standards for **coal fired power stations**. Analysis of health impacts caused by coal fired power stations in Australia has found that they contribute to 845 babies being born with low birth-weight, 14,434 children with asthma, and 785 premature deaths each year<sup>1</sup>.

In NSW just one coal power station and its associated coal ash dams – the Vales Point power station – is having significant local health impacts on the Central Coast community. Research by local group Future Sooner has found that an additional 150 cases of cancer and 650 cases of childhood asthma are being suffered by the community in the surrounding region as compared to other regions without coal fired power stations<sup>2</sup>.

That is one example, but other coal power stations in NSW will be causing similar local health problems in their surrounding area.

Due to the dangerous impact on the health of NSW residents caused by coal power stations it is imperative that the government require them to control their emissions of toxic pollutants as soon as possible.

We ask that the new regulation include the following amendments:

1. The current standards for coal fired power station pollution in NSW are too high. Toxic pollutants known to harm health such as nitrogen oxides, sulphur dioxide, particulates and mercury remain too high in the proposed amended regulation. **We ask that the NSW government amend the standards to bring them in line with the European Union<sup>3</sup>.** In addition to the EU, other equivalent jurisdictions have much stronger air pollution standards than Australia, including the US, China, Japan and South Korea.

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<sup>1</sup> Dr. Aidan Farrow, Andreas Anhäuser and Lauri Myllyvirta, Lethal Power: How Burning Coal is Killing People In Australia (August 2020), pp 22-24. Available at: <https://www.greenpeace.org.au/wp/wpcontent/uploads/2020/08/GPAP-Lethal-Power-full-report.pdf>

<sup>2</sup> Pers. Comm. Joseph Halwagy, Future Sooner

<sup>3</sup> For the EU Standards see Table 10.3 – 10.7, Best Available Techniques (BAT) Reference Document for Large Combustion Plants, Industrial Emissions Directive 2010/75/EU, European Commission, 2017, <http://dx.doi.org/10.2760/949>



2. The time frames for cutting the toxic pollutants from coal power stations are too long and **should be shortened to 2-3 years**. There is technology available now that companies who own coal power stations can use to bring down their emissions of toxic pollution.
3. **Companies should not be given exemptions** from needing to install these technologies – the standards should be enforced equally for all coal power stations.

The second issue we would like to raise is that **we believe the NSW EPA should regulate carbon emissions in NSW as part of the imperative to mitigate dangerous climate change.**

NSW - and Australia - is already experiencing the impacts of climate change, including increasing temperatures, the warming and acidification of oceans, sea level rise, decreased rainfall in southern parts of the country and increased and more extreme rainfall in the north, longer dry spells, greater number of extreme heat days and the long-term increase in extreme fire weather. The recent 2022 floods in NSW and the bushfires in 2019 are clear examples of this clear and present danger.

Climate change is also a serious social, health and economic issue – the greatest issue of our times. There are major implications across all sectors including health, tourism, agriculture, infrastructure and national security.

Urgent and rapid reductions in greenhouse gas emissions is required, consistent with efforts to limit global average temperature rise to 1.5°C above pre-industrial levels. The longer emissions reductions are delayed, the more severe the effects of climate change will become.

The NSW EPA, as the lead environmental regulator in NSW and being responsible for protecting the quality of our environment and human health, can and should regulate greenhouse gas emissions.

**We ask that the Clean Air Regulation also include the regulation and reduction of the greenhouse emissions of NSW businesses and operations. In the same way the EPA regulates air pollution, it should also regulate carbon emissions.**

The NSW EPA has existing powers to do this crucial task on behalf of our community, who the EPA was created to protect. There are catastrophic consequences of uncontrolled emissions on all aspects of the environment and on human health and therefore there is no more important form of pollution for the EPA to address.

Sincerely,

**Australian Parents for Climate Action Inc.**

Contact: Suzie Brown, Non-Executive Director [REDACTED] phone [REDACTED]