

Thank you for the opportunity to contribute feedback to the NSW Environment Protection Authority on the draft Protection of the Environment Operations (Clean Air) Regulation 2022 (the proposed Clean Air Regulation).

I am a resident of Armidale, a rural city in northern NSW which has the record of suffering the worst air pollution in Australia and, for many years now, I have been involved in environmental activism to protect our land, water, air and climate from the effects of those fossil fuel industries and ‘development’ which appear to have once again been advantaged by Government proposals.

The question of poor air quality impacts on my everyday life every winter’s day here in Armidale (see picture below); and the continuing climate-changing pollution of coal-fired power stations impacts on the future of us all.



We know

- that pollution from coal fired power stations and wood smoke is dangerous and harms human health.
- that there is abundant evidence that fine particle exposure, in particular, causes adverse health effects and increased risk of death
- that there is no safe level of exposure to air pollution.
- coal-fired power stations and the continued burning of wood are fuelling the climate crisis

Health Impacts of coal fired power stations and wood heaters

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 year¹.

¹ ¹ Submission jointly compiled by NSW Nature Conservation Council and Environmental Justice Australia

Meanwhile here in Armidale the tv news reports, we have the worst air pollution in Australia. [The five worst air polluted places in Australia \(9news.com.au\)](https://www.9news.com.au/news/australia/5-worst-air-polluted-places-in-australia/2021/01/27) ‘ Armidale has the worst air [pollution](#) in Australia, with a new report revealing the New South Wales town exceeds the air safety guidelines of the World Health Organisation by more than double.’

This news report goes on, ‘Located midway between Sydney and Brisbane, Armidale is known for its proliferation of wood burning heaters to ward off cold temperatures during winter.’

Wood heater pollution is the major contributor to air pollution health damage and is responsible for an estimated 46% of population-weighted exposure to PM_{2.5} pollution in Sydney – at least 100 premature deaths, with health costs of thousands of dollars per wood heater per year, as reported in the draft NSW Clean Air Strategy. A very small proportion of Sydney households using wood heating are responsible for nearly half of population-weighted exposure to the most hazardous PM_{2.5} pollution. Pollution from wood heaters has been shown to increase the risk of heart attacks, strokes, dementia, covid19, lung diseases, asthma, premature & low birth-weight babies, reduced IQ & behavioural problems such as anxiety and attention deficit when children start school, and worse academic performance as teenagers²

Current regulations are inadequate

Power stations in NSW are licenced to emit toxic air pollution at concentrations far greater than power stations in other jurisdictions. For several decades the US, EU, South Korea, China, Japan and other nations have required increasingly effective pollution controls for particle matter, nitrogen oxides, sulfur dioxide and mercury.³

Local Councils appear to be unable to shield residents from on-going pollution from wood smoke.

Solutions

The NSW Government must create legislation to bring about an effective, socially just and rapid transition to renewable energies. In the meantime, legislation which insists on the use of currently existing technologies to reduce air pollution from coal fired power stations such as low nitrogen oxides burners wet scrubbers or selective catalytic reduction methods should be implemented and pollution standards that apply to coal fired power stations should be tightened.

The NSW Government must create a legislative framework to encourage Local Councils to act in the best interests of the health of residents. The Armidale Regional Council, on its website at [‘Solid Fuel Heaters and Wood Smoke’](#), consistently uses low modality language (‘wood smoke can have adverse effects’ rather than **does have**) and directs readers to suggestions to minimise the health impacts of wood smoke pollution rather than being positioned to undertake projects to replace wood heaters with alternative energies which are more efficient, less expensive and significantly more environmentally friendly.

I look forward to reading the EPA’s contribution to significantly improving the proposed legislation.

Elizabeth O’Hara

² Robinson, D.L., et al., The effects on mortality and the associated financial costs of wood heater pollution in a regional Australian city. <https://www.mja.com.au/journal/2021/215/6/effects-mortality-and-associated-financial-costs-wood-heater-pollution-regional>. Medical Journal of Australia, 2021. n/a(n/a).

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