

Thu 2/06/2022 9:52 AM

Eric Ghosh [REDACTED]

Submission re proposed Clean Air Regulation

Dear sir/madam

I wish to response to part 2 of the RIS (and of the Regulation), which concerns domestic solid fuel heaters. While I realise this is not the focus of the consultation, I think it very much needs to be rethought. The only options considered are the status quo, in terms of regulations, or removing them all together. No option of tightening the regulations in relation to solid fuel heaters is articulated or considered.

I live in Armidale, and your department would be well aware of the special impact that these heaters have in Armidale – the greatest impact, it seems, in any city in Australia. You would be aware of evidence of how the smoke issue in Armidale creates significant health problems in young children, asthmatics and generally reduces life expectancy. A 2018 study, published in the Medical Journal of Australia, estimated that Armidale's PM2.5 pollution causes 14 premature deaths every year.

Many nights in winter, the AQI is close to 200 where I live with respect to PM2.5. I appreciate that the lack of consideration of stricter options in the RIS may reflect what was indicated by your Minister, James Griffin, in Parliament in Budget Estimates on 1 March that 'there is no appetite' for looking at the standards in place at the moment for woodfired heaters. Such a lack of appetite, unfortunately, is condemning many people to chronic health problems and an early death.

Exactly what options should have been articulated in the RIS is not something I am in a position to authoritatively articulate. However, options that come to mind include not permitting new wood heaters on residential blocks smaller than 2 hectares that have electricity grid connections. An interim option could be requiring local councils to put in place requirements to consult neighbours whose health might be impacted by the installation of wood heaters.

Regards

Eric

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Dr Eric Ghosh

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