

**INQUIRY INTO PERFORMANCE OF THE NSW
ENVIRONMENT PROTECTION AUTHORITY**

Name: Name suppressed

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Partially Confidential

My comments relate to the fact that the EPA has failed to take any effective action to reduce winter wood smoke pollution in Sydney and has delegated responsibility to local councils who are more concerned with improving residents' amenities than dealing with air quality issues. Wood heater smoke pollution is a problem which occurs at night in winter and is not visible during council working hours. Most residents are unaware of the serious health risks of wood smoke because wood fires have a cosy traditional image unlike other sources of pollution. So the issue has not been raised to the level of popular attention that seems to be necessary for a council to take action.

Every winter I am made ill by wood smoke infiltrating my house in Sydney despite taping shut windows and terrace doors. The wood smoke comes from various directions in the dark so it is not possible to pinpoint which houses are emitting it and ask the council to take action. The problem is far worse on weekends, suggesting that wood heaters are being used for their cosy ambience rather than out of necessity. It is not fair that the tiny minority of houses using wood heaters should be allowed to pollute entire neighbourhoods, causing distress and illness to vulnerable neighbours, when they have access to non-polluting sources of heating.

I did ask a councillor and an environmental health officer to get the council to apply to participate in the EPA's Wood Smoke Reduction Program. There was no response to my follow-up messages asking if any action had been taken. This is a good example of how the wood smoke issue gets ignored, even by a council that is otherwise environmentally-conscious.

While the Wood Smoke Reduction Programs are helpful, participation in them is discretionary and concentrated in the year of participation. This sort of piecemeal occasional approach has little effect in tackling a problem that has to be dealt with systemically at state level and not by councils that lack the will and knowledge.

While the EPA's website sets out the serious health risks of wood smoke and the fact that wood smoke is the biggest contributor to Sydney's winter air particle pollution, these facts are little known to the general public, which is why there has not been the sort of public pressure that causes action to be taken. The level of ignorance is similar to the days before the dangers of cigarette smoke or asbestos were widely known and it took high level government action to educate the public. The EPA, as the statutory body responsible for environmental health, has a duty to inform the public, which it has not done in any active manner. In many ways, wood smoke is worse than cigarette smoke, not just because of its greater toxicity, but because damage is inflicted not so much on the user, but on a wide range of people in the neighbourhood who have absolutely no control over it and who, in vulnerable cases, may suffer serious health problems as a result. People using wood heaters for ambience need to understand that wood smoke is not "nice".

The EPA's "Options for wood smoke control" paper sets out various options which would be effective if adopted. However, leaving this to the discretion of councils would mean that the most widespread option likely to be adopted is "Do nothing". To have any impact on the increasing rates of wood heater use, only mandatory statutory controls will have any real effect. Wood heater use may be acceptable in rural areas but it has absolutely no place in built-up areas where there may be a metre or less

between houses. There needs to be a framework to systemically phase out wood heaters in urban areas. To have any real effect, this would require as a minimum:

1. banning installation of new wood heaters
2. requiring removal of existing wood heaters when a property is sold
3. offering cash incentives to trade in wood heaters for non-polluting forms of heating
4. ongoing programs to educate people on the health risks of wood smoke and how to reduce emissions from existing wood heaters.

Funding for this could be raised by levies on wood heaters and firewood on a “polluter pays” principle.

The EPA’s paper states that implementation costs are relatively modest compared to the substantial health benefits that would be achieved. The crux of the matter is to get wood smoke control measures actually implemented. The approach of leaving it to the discretion of councils has already failed miserably and in its paper, the EPA should really have advocated a mandatory framework rather than suggest more discretionary options for councils to consider.

Air quality is the most universal aspect of the environment. It affects everybody. The EPA is the statutory body charged with protecting air quality. The serious health risks of wood smoke have been known for decades. The EPA has highlighted all this on its website and invites councils to apply for its Wood Smoke Reduction Programs. But wood heater use keeps rising. The public thinks wood heaters are safe because they are approved by the ASA. The only people who complain in public are asthmatics and the NSW Chief Medical Officer. The EPA knows how dangerous wood smoke is – it is time it made sure the public also knows and that all urban councils have an effective program to reduce wood heater use.