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asthma

FOUNDATION OF TASMANIA

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Ms Kerry Scott
Project Manager
NEPC Service Corporation
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Dear Ms Scott

Please find enclosed dot points for response to the NEPM discussion paper from the Asthma Foundation of Tasmania.

The Tasmanian community and those who suffer from asthma and related respiratory illnesses are amongst those most sensitive to the harmful effects of air pollution in the Australia. Many are adversely affected by air pollution at levels lower than the current standards consistent with the evidence that that many pollutants have no lower level that could be considered to be harmless. The Asthma Foundation therefore strongly supports continual improvement in air quality and ongoing strengthening of AQ standards.

Specific comments and recommendations

1. Given the strong and consistent evidence relating to PM2.5 in we strongly endorse the suggestion that the current reporting standards for PM 2.5 change from reporting to regulatory. This is particularly relevant for Tasmanian towns and cities where smoke from indoor wood heaters is a major contributor to poor ambient air quality each winter
2. The foundation agrees with the observation in the NEPM discussion document that bushfire smoke is becoming an increasingly common source of pollution with increasing severe fire weather. We also note that efforts to reduce fuels through prescribed burning programs, as recommended by the Royal Commission into the Victorian Bushfires, are likely to dramatically increase and that these too will affect air quality, albeit to a lesser extent than severe bushfires.

This issue is relevant to Tasmania as routine burns conducted by forestry industry seasonally cause severe air pollution in many parts of Tasmania. For this reason the foundation was disappointed that the issue of landscape fire smoke was not specifically addressed in the discussion paper.

3. The foundation strongly recommends that the NEPC develop specific guidelines and air quality targets for prescribed landscape burning for any reason (including agriculture, forestry, fuel and ecological management). These should include short term ,eg 1 hour or 4 hour targets for PM2.5, and should be incorporated into the NEPM.

4. We strongly disagree with the suggestion that 'natural and exceptional events' such as bushfires are removed from the compliance standards for the following reasons:
 - It is not possible to define a 'natural' versus an 'unnatural' fire. The contention in the discussion paper that 'natural' events are not amenable to management is erroneous. Human land management practices can either increase or decrease the risk of severe bushfires and dust storms^{1 2}
 - Fire regimes, and therefore smoke, are amenable to manipulation and intervention. Interventions to reduce severe fire events will by definition also reduce severe smoke events.¹
 - Bushfire smoke pollution has serious public health effects. There is evidence that the respiratory health impacts are likely to be worse than similar levels of background urban particulates arising from the combustion of fossil fuels^{3 4}
 - We believe that the public will be better served if the NEPC is pro-active about managing potential public health hazards rather than choosing to ignore them

5. We agree that concept of 'allowable exceedences' is arbitrary and suggest that these are not included in the standards. If AQ standards are not met then this should simply be reported along with detailed explanation for the reasons and review of management strategies. Eg if bushfire smoke is the main reason that targets are not being met then the management plan for the prevention of severe bushfires needs to be reviewed.

6. Many of our standards are not as stringent as California's Environmental Protection Agency (CARB). We should be aspiring to be world leaders. The cleaner the air the better the health of society. We have outlined, in the accompanying table, our requested levels for currently identified pollutants.

Yours sincerely



Cathy Beswick
CEO
Asthma Foundation of Tasmania

For

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Dr John Marrone
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