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Dear Kerry

Submission: Review of the NEPM Discussion Paper

I am a resident of Launceston Tasmania and President of the Tamar Bicycle Users Group. For many years I have been concerned with the poor air quality in Launceston, particularly in winter due to wood smoke. With the increase in recreational and commuter cycling in the catchment there is even more widespread concern about air quality. Despite general improvements in air quality, the Launceston and Tamar region still suffers from unacceptable ambient levels of air quality pollution due to wood smoke from both forestry burn offs and wood heaters and from road traffic pollution.

The Launceston air shed is particularly vulnerable to particulate pollution due to the inversion layer that occurs. This local phenomenon traps particle saturated air at residential level, particularly during winter. My comments are therefore restricted to the discussions around the levels of particulates and the recommended Standard. I am not a scientist so I cannot comment on the science of the analysis and research contained in the Discussion Paper; however I make the following comments.

I would like to congratulate all those involved with preparing and reviewing the paper. The research has been summarised in a style that I was able to understand and follow. The review and consultation process is comprehensive and allows for input at all stages and I commend the Corporation for this process.

The Launceston City Council has been rolling out a system of bicycle routes and trails. There are plans for a regional network of routes that will connect the roads through the jurisdictions of the neighbouring councils. We already have a high number of cycling enthusiasts and cycling is increasingly being taken up as a healthy recreational activity and for commuting. Commuting by bike is a means of reducing green house gas emissions and pollution by replacing cars on roads where possible.

As the infrastructure improves and people increase their confidence sufficiently to take to the roads, we will see the cycling revolution that is rolling through the rest of the world gain momentum in Launceston. It would be a contradiction for us as a community to be moving to improve the health of a large number of people by improving their level of outdoor activity and by reducing pollution through alternative transport policies and **not** to be moving towards improving the air quality in which those activities occur. This is in addition to the need to improve the air quality for residents generally.

The Paper reports on the direct relationship between higher particulate levels and increasing health effects from all causes and particularly cardiovascular and respiratory disease. Of particular concern is that the research cannot determine a threshold level of tolerance of particulates in the atmosphere. As I read it, this means that **any** level of particulates in the atmosphere is likely to have effects on health and cause premature deaths. Improving air quality in Launceston will reduce these deaths and cut the health costs to the community.

The Launceston City Council has been running a wood heater replacement program that has removed over 2500 wood heaters since 2001. This action has dramatically reduced the measured effects levels of PM10 as reported on the Environment Protection Authority web site. Although the number of breaches of the NEPC standard has reduced, it is of concern that levels of both PM10 and PM2.5 spike above the Standard of 50 ug/m³ for PM10 and 25 ug/m³ for PM 2.5. We still have a "hard core" of wood heater owners, many of whom continue to pollute the atmosphere. The pattern of this pollution spikes as wood heaters are fired up at the beginning of the day and in the evening, just as many people are undertaking healthy a outdoor recreational activities or commuting to and from work on bikes.

The research indicates that "even short term exposure has impacts on health, particularly for sensitive sub groups of elderly, young children and those suffering from pre-existent heart or lung disease" (Point 5). Further research is required to set short term objectives.

It is not clear in the Discussion Paper what the affects of the 8ug/m³ annual average Standard will be on compliance standards.

There is a pattern of particulate levels in the Launceston catchment where we have significantly high "spikes" in recorded levels during the high risk winter months. I believe that there is a special case to be made for local standards where identified environmental and seasonal factors contribute to these predictable spikes.

The reduction of the manageable causal factors in these situations requires a strategic approach co-ordinated across all jurisdictions and the community to bring about a long term continuous improvement in air quality. Localised standards would enable better planning and action to bring about air quality improvement where ambient air quality is poor for identifiable periods throughout the year.

In summary

1. I congratulate the report writers, contributors and researchers on an excellent report.
2. I support the upgrade the PM2.5 recommendations of 25ug/m³ 24 hour average and the 8ug/m³ annual average as Compliance Standards
3. I recommend consideration of the benefits of Standards based on single incident expedience for high risk locations such as Launceston and Armidale NSW.

Yours sincerely



Malcolm Cowan