

**REVIEW OF THE NATIONAL ENVIRONMENT PROTECTION  
(AMBIENT AIR QUALITY) MEASURE  
AIR QUALITY STANDARDS DISCUSSION PAPER**

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The headings below have been extracted from the discussion paper. **Chapter 5: Issues to be considered in evaluation of NEPM standards** (page 140 of *AAQNEPM Review Air Quality Standards Discussion Paper*) provides further discussion on these questions.

#### **ISSUES TO BE CONSIDERED**

**Q1. Is there sufficient new health evidence to support a revised standard and if so, for which pollutants?**

Dr Ernst, Tasmanian Environmental Medicine Specialist reports that, 'Over the last few years I have seen an increasing number of people with adverse effects from air pollution generated by widespread burn offs...public health issue of significant magnitude.' It continues to be a widely known fact that smoke pollution systematically destroys health.

Health is particularly at risk given the national push for increasing polluting fuel reduction burning following the Victorian Royal Commission into the Victorian bushfires. To safeguard health from this planned increase in fuel reduction burning, the standard for PM 2.5 must be- at minimum- Immediately elevated to the same status as that of the PM 10 standard.

**Q2. Does the current approach, which allows for a number of exceedences of the standard, meet the requirement for adequate protection or are there alternative methods that could provide more consistency in the level of health protection associated with complying with the NEPM standards?**

Better health protection would be obtained if standards were also based on elevations of levels in a space of time. eg elevations over 40 for PM 10 and over 15 for PM 2.5 in a 24 hour period. No exceedences must occur from planned burning without guaranteed prosecution (currently not possible)

**Q3. Should changes be made to the reporting protocols that would lead to a greater transparency and better understanding of the causes of exceedences in jurisdictions, the potential risk to population health, and management approaches being undertaken to address these exceedences?**

Given the national push for increasing polluting fuel reduction burning following the Victorian Royal Commission, Quality air Tasmania urges the NEPM Executive to insist on a National Air Authority with knowledge of all burns, planned, prescribed and bushfires, thereby able to determine sources of burning air pollutants so swift action may be taken to prevent burn related exceedences and hold polluters to account eg those in Burnie and Geeveston Tasmania, and the statewide fumigation of Tasmania on 17 March 2010 that are being condoned under the current forestry system. Reporting without action as currently occurs amounts to negligence and pollution demands immediate action or mass health will continue to be compromised in 2011.

**Q4. Any other issues you wish to raise?**

Given the statistics from the Tas. Air Section, DPIPWE, EPA below, forestry industrial burning currently exacerbates air quality in Tasmania and confirms the Immediate need for a national PM 2.5 standard, at minimum on a par with the PM 10 standard.

2008 Tas. Forestry Industry Burns(not fuel reduction): 86,000 - 122,000 tonnes

2008 Tas. Domestic wood heaters: 5,000 tonnes

Would you please inform me as to the outcome of the issues made in this submission.