

Your feedback is invited

**Feedback Form for the
Review of the National Environment
Protection (Ambient Air Quality) Measure**

Introduction

The National Environment Protection Council is keen to seek your comment on the Review of the National Environment Protection (Ambient Air Quality) Measure (AAQ NEPM).

The overall purpose of the review is to evaluate the performance of the current AAQ NEPM in achieving the desired environmental outcome of "*ambient air quality that allows for the adequate protection of human health and well-being*" and to recommend any required changes to the NEPM.

Written comments are invited by close of business 27 August 2010.



Have your say

All interested government, industry, community-based groups and individuals are invited to make comment on the Review of the Ambient Air Quality NEPM Discussion Paper. Please complete and return the attached form.

Submissions to NEPC

Separate or additional printed or electronic submissions are also encouraged to be made to:

Email to:	CD Rom, or printed to:
kscott@ephc.gov.au	Ms Kerry Scott
	Project Manager
Fax to:	NEPC Service
(08) 8224 0912	Corporation
	Level 5/81 Flinders Street
	ADELAIDE SA 5000

Comments are invited by close of business 27 August 2010

More information

The discussion paper is available on the EPHC website www.ephc.gov.au.

NEPC Service Corporation
Telephone: (08) 8419 1200
Email: exec@ephc.gov.au
EPHC website www.ephc.gov.au

Your say on the Review of the Ambient Air Quality NEPM

For each of the questions space is provided to give more detailed feedback. To assist with your response a number of questions you may wish to consider have been listed below:

- If yes, what evidence suggests to you that the current standard may no longer be appropriate?
- If no, briefly summarise why you think the current standard is appropriate.

Is there enough evidence to recommend revising the current carbon monoxide standards?

Yes No

Lower level of priority as typical ambient levels are well within current standard in Qld.

1. Is there enough evidence to recommend revising the current nitrogen dioxide standards?

Yes No

Lower priority compared to particulates, ozone and SO₂.

2. Is there enough evidence to recommend revising the current ozone standards?

Yes No

Evidence supports review is a higher priority given its short-term irritancy and no apparent threshold.

3. Is there enough evidence to recommend revising the current sulfur dioxide standards?

Yes No

Evidence supports this is a higher priority especially for short-term exposure e.g. 10-minute standard.

4. Is there enough evidence to recommend revising the current lead standards?

Yes No

lower level of priority for review.

5. Is there enough evidence to recommend revising the current PM10 standards?

Yes No

Evidence strongly supports this review is a high priority.

6. Is there enough evidence to recommend revising the:

6.1. current PM2.5 advisory reporting standards,

Yes No; and / or

6.2. including PM2.5 as a compliance standard with goals?

Yes No

Evidence supports that is a very important fraction with sources very different to those for PM₁₀

7. Is there enough evidence to recommend including benzene in the AAQ NEPM and establishing a standard?

Yes No

Common contaminant with significant identified health effects from long-term exposure.

8. Is there enough evidence to recommend including PAH's in the AAQ NEPM and establishing a standard?

Yes No

Same comment as for benzene (see above)

Evaluation of performance

9. Does the current approach, which allows for a number of exceedences of the standard, meet the requirement for adequate protection?

Yes No

It is a concept which is not based on health risk, which should be the key driving principle in establishing such standards.

A number of alternatives to the current approach are considered in the Review. Do you support:

10. Assessing compliance with the standard using a percentile form (not stating an allowable number of exceedences)

Yes No

Allows more informed assessment and reporting of
the distribution of air quality data.

11. Having a 'not to be exceeded' standard based on health protection and requiring reporting of cause of exceedences, progress toward meeting the standards and actions taken

Yes No

Could be a secondary level standard.

12. Allowing 'exceptional' or 'natural' events (such as bushfires or dust storms) to be excluded from the assessment of whether the air quality in a region is in compliance with the standards or not.

Yes No

Events that are beyond control eg dust storms are
best excluded from the data for compliance monitoring/
assessment, but such data should still be reported.

13. Are there alternative methods that are not provided above which offer a better or a more consistent level of health protection? Please detail.

Yes No

Reporting protocols

14. Should changes be made to the reporting protocols for exceedences?

Yes No

Unclear about current reporting protocols but consider exceedences should be reported fully and as early as possible.

15. Should states and territories be required to assess and provide clear justification for sources of exceedences?

Yes No

Strongly support.

16. Should states and territories be required to advise the public immediately in the event of an exceedence in addition to annual reporting requirements?

Yes No

If there are concerns about health risks that might be posed to an exposed community.

17. Should states and territories be required to report daily air quality results and/or predict future air quality through an Air Quality Index or similar?

Yes No

Excellent idea which we are aware already occurs in some jurisdictions.

Overall comment

18. Please use the following space to provide any additional comments or suggestions on the Review of the National Environment Protection (Ambient Air Quality) Measure.

Clear documentation in the review process of the health risk assessment of relevant pollutants and final decisions on standards. The rationale for the final decisions needs to be very clearly outlined especially if significantly different from health risk assessment.

Feedback form

If NEPC decide to vary the AAQ NEPM would you like to be contacted for the next phase of the consultation?

Yes No

If you have answered yes, please provide your details:

Name: ENVIRONMENTAL HEALTH BRANCH

Organisation (if applicable): QUEENSLAND HEALTH

Daytime contact number: ~~07 9310~~ 07-3328 9310 (reception)

Postal Address: PO BOX 2368 FORTITUDE VALLEY BC QLD 4006

Email: EHU_Correspondence@health.qld.gov.au

Comments compiled by

1. Dr CONRAD NOLAN
SENIOR MEDICAL OFFICER

2. Mr CLIVE PAIGG

PRINCIPAL ENVIRONMENTAL HEALTH SPECIALIST