



Queensland Nickel
Greenvale Street
Yabulu QLD 4818
Private Mail Bag 5
Mail Centre
Townsville QLD 4810
Tel +61 7 4720 6200
Fax +61 7 4720 6251

27 August 2010

Ms Kerry Scott
Project Manager
NEPC Service Corporation
Level 5/81 Flinders Street
Adelaide SA 5000
kscott@ephc.gov.au

Dear Ms Scott,

Re. Review of the National Environment Protection (Ambient Air Quality) Measure

I write to you in response to an invitation to comment on the latest health findings as part of the Review of the National Environment Protection (Ambient Air Quality) Measure.

I refer to key questions identified in the Discussion Paper July 2010 and outlined in the '1. AAQ NEPM Review Overview' document made available through the series of public consultation meetings held recently.

Please do not hesitate to contact myself if you have any queries.

Yours Sincerely

Sally Bushnell
Environmental Scientist
Ph. 07 4720 6001
sally.bushnell@qni.com.au

Review of the National Environment Protection (Ambient Air Quality) Measure

Key questions identified in the Discussion Paper:

- a. *Is there sufficient evidence to support a recommendation to NEPC to revise the current standards in a variation to the NEPM? If so, for which pollutants?*

There is not enough evidence to support a recommendation to revise the current standards. Although research has been relatively comprehensive regarding the health effects of various air pollutants, there are gaps concerning the application of this into regulated numbers for industry. There is no doubt that air pollutants must be kept to the minimum, and it is important that industry is given guidelines on how this is to be achieved. The gap is setting realistic and hence achievable targets – barriers to this include separating natural and anthropogenic sources of air pollution, the ability to single out and independently measure one source of air pollution versus another, and in some cases the technology to measure air pollutants adequately, particularly at the low levels required.

The evidence showing the health risks associated with air pollutants warrant further research into various industry and natural sources, the links and how it can be managed effectively in the ‘real-world’ situation. With this guidance the NEPM standards could be revised.

- b. *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?*

The allowance for a number of exceedences of the standard reflect the problem in setting standards without full knowledge of various sources of impacts to air quality, behaviour of contaminants and ‘whole-of-mixture’, and monitoring methodology/technology. Filling such knowledge gaps and setting standards with greater confidence should equate to stricter standards (i.e. no exceedences), affording greater protection and consistency. Until such time it may be more beneficial to set the standards as a 95th percentile, or a rolling average, which still allows for exceedences (although minimal) while maintaining the given level of protection.

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

Providing greater transparency and increasing the information available to stakeholders is important, and there is potential for changing reporting protocols. In particular, it is important that exceedences are investigated for a better understanding of air quality and issues, and ways in which improvements can be made. This should be at an industry level, but also a local or regional level. Reporting requirements help ensure that this is done, and provides a means in which stakeholders are kept informed.

One potential issue from the industry perspective is the already heavy reporting load. In many cases industry has reportable limits set on emissions by state authorities, and this must be taken into consideration. It may be that these limits need to be re-assessed, or managed in an alternate way in conjunction with NEPM standards. There is potential to streamline compliance and reporting requirements through integration.