

**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?

Yes, there is sufficient evidence to create a new standard for PM_{2.5}, using the current recommendations of daily PM_{2.5} < 25 µ/m³ and the annual daily average < 8 µ/m³. The other existing standards appear appropriate.

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?

It is useful to set a maximum number of exceedences (eg 5 per year) as a guideline, but it is more important to explore the reason for each exceedence. This is especially important for particle pollution, where the response needs to be very different if the exceedences are from home wood heaters compared with exceedences arising from vegetation burn-offs or forestry fires or dust storms. Hence, it is equally important to request the reporting authorities to include data about the likely explanation for each exceedence.

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?

For pollutants with no threshold safe value, such as PM10 & PM2.5, it would also be beneficial to have similar explanations provided for high levels which fall within the NEPM standard (perhaps those which are above 50% of the maximum permitted value).

Q4. Any other issues you wish to raise?

We wish to commend the authors of this most comprehensive report. It provides an up-to-date and detailed review of the published literature involving the major air pollutants and their effects on human health. The report highlights the importance of particle pollution.

Our Air Quality Working Group has played an active role to help reduce the wood smoke pollution in Launceston in recent years. Like other cold inland valleys, Launceston has temperature inversions in the winter which trap pollutants close to the ground. Launceston had some of the highest particle pollution levels recorded in Australia in 1991 to 1995 (many days in the 100 - 200 $\mu\text{/m}^3$ range). Since then, there has been a marked improvement to meet the NEPM PM10 standards by 2008. The success is largely attributable to having educated and assisted the residents to switch to cleaner energy sources for home heating in the winters (specifically electric heating rather than using wood fuel). We have yet to achieve the NEPM recommendations for PM2.5 levels, but we are nearing that goal as more residents switch to cleaner home heating.

An upgrade of the PM2.5 recommendations to a new NEPM standard would assist our local councils to introduce new measures to reduce the wood smoke created by a small minority of residents which affects all residents. We are aware that this is also of concern to groups similar to ours which are trying to reduce wood smoke in other regions of high particle pollution such as Armidale NSW & Tuggeranong ACT. These regions also need the new PM2.5 standards to prompt further action by their local councils.