Attention:
Air Quality Coordinator
Department of Environment, Land, Water and Planning

Re: *Clean Air for All Victorians: Victoria's Air Quality Strategy*

Environment Victoria is one of Australia's leading environment groups. With more than 40 member groups and tens of thousands of individual supporters, we've been representing Victorian communities on environmental matters for nearly 50 years.

We are very pleased to make a submission on Victoria's Air Quality Strategy. We want to see it lead to policies capable of significantly reducing Victoria's air pollution and addressing the interconnected challenge of climate change.

Introduction and key recommendations

Reducing air pollution in Victoria is of critical importance. Air pollution causes over 3000 deaths in Australia every year, and thousands more instances of chronic disease and disability.[i]

As Victoria's climate continues to warm and dry as a result of anthropogenic climate change, we can expect to see an increase in ground-level air pollutants and a corresponding experience of more serious health impacts. Victoria's Air Quality Strategy must therefore address the related challenges of global warming and air pollution concurrently. This should begin by urgently limiting pollution from coal-burning power stations, Victoria's biggest point sources of both climate and air pollution. Strategies to accelerate the uptake of clean energy and energy efficient technologies will also help reduce pollution by requiring less fuel combustion.

Victorian's Air Quality Strategy should strive to achieve environmental justice, a concept that requires the just distribution of environmental risk and benefits amongst the population, and the right of all to meaningful participation in environmental decision making. As such, the strategy needs to be an accessible and empowering policy tool that significantly reduces the burden of air pollution with a focus on Victoria's most vulnerable communities.

Summary of recommendations:

1. Integrate strategies to tackle climate and air pollution
2. Urgently limit climate and air pollution from Victoria's coal-burning power stations
3. Implement a suite of policies to accelerate the shift to renewable energy and increase energy efficiency to reduce the need for fuel combustion
4. Prioritise empowering pollution-affected communities and work towards environmental justice

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5. Explore other recognised ways of reducing air pollution, including:
    - Strengthening Victoria's air pollution laws
    - Subject big polluters to stricter tests and restrictions
    - Expediting the introduction of a load-based licencing scheme
    - Investigating state-based measures to shift to a zero emissions transport system

1. Integrate strategies to tackle climate and air pollution

Victoria's experience of climate change is deeply related to the problem of air pollution. As global warming causes Victoria's climate to become hotter and drier, we are likely to see an increase in certain air pollutants, particularly ground level ozone, increasing the danger to human health.[ii]

However the chief reason air pollution and climate change should be tackled together are their common drivers. Coal-burning power stations are responsible for almost 40 percent of Victoria's climate pollution[iii] and 80 percent of major air pollutants as reported under the National Pollutant Inventory[iv]. (See figures 1 and 2.)

Figure 1: Victoria's 10 highest emitters of greenhouse gas.[v]

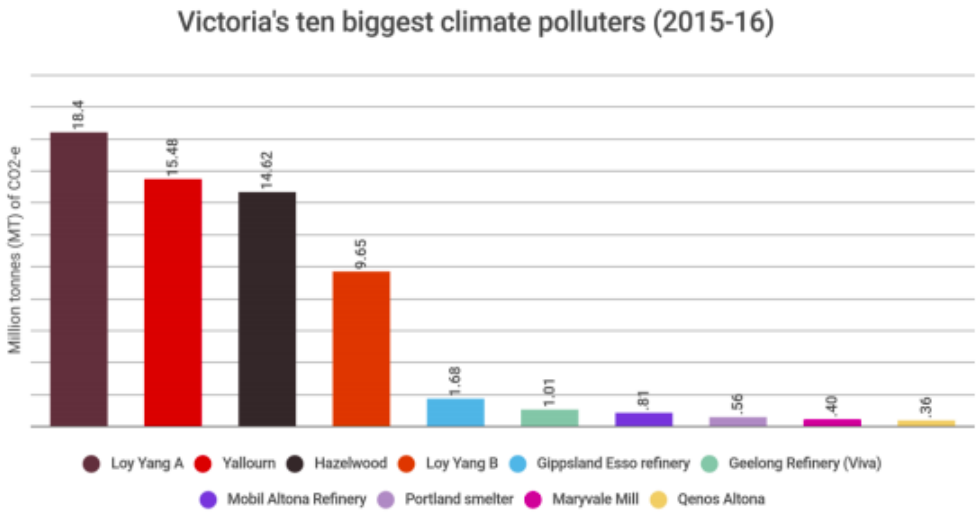
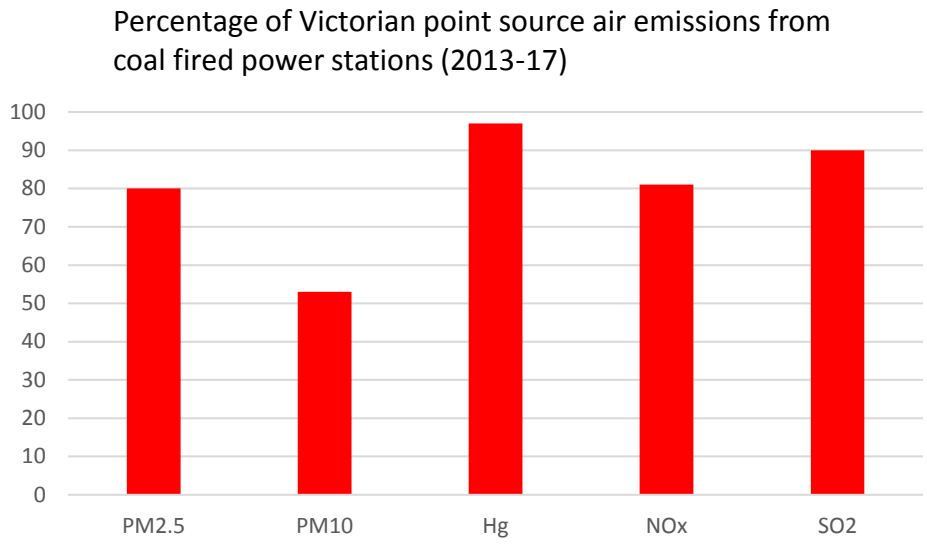


Figure 2: Percentage of point source air pollution from coal fired power stations in Victoria 2013-17[vi]



Emissions from vehicles are also a major source of air pollution and greenhouse gases.

It therefore makes sense to tackle these two major threats to human health concurrently. Just as Victoria now has a legislated target to reduce pollution from greenhouse gases to net zero greenhouse gas emissions by 2050, Victoria should also set a target of reducing air pollution to zero.

Recommendation:

> **1a.** Set a target for reducing Victoria's air pollution to zero, in line with Victoria's zero emissions climate target.

2. Urgently limit climate and air pollution from Victoria's coal-burning power stations

As outlined in Figure 2, coal-burning power stations are Victoria's biggest point source of particulate pollution, sulphur dioxide, nitrogen dioxide and mercury. They are also responsible for over 43 million tonnes of CO2 emissions annually. [vii]

These two challenges are both currently being examined in a review of brown coal power station licences being conducted by the Victorian Environment Protection Authority (EPA).[viii] The purpose of this review is to bring the licences up to date with community expectations.

There are two key ways the licences must be amended to address climate and air pollution:

> **2a. Coal power station licences must include annual limits on greenhouse gas emissions**

These limits should correspond with the emission reduction targets that Victoria has already set – which is to reduce emissions by 15-20 percent on 2005 levels by the year 2020 and reach zero net emissions by 2050. In the absence of interim emissions reduction targets for 2025 and 2030, generators could be required to reduce emissions by three percent a year, which is the average amount Victoria needs to cut if we are to reach the 2050 target.

Placing limits that decline each year by about 3 percent on our state's biggest climate polluters would end the absurdity that the biggest polluters in Victoria currently face no restrictions on the damage they do to our climate. This approach would allow coal generators to reduce emissions by improving efficiency, curtailing output and planning for change in their generation supply - which has the co-benefit of reducing air pollution.

2b. Limits to air pollution must be brought into line with international standards and best practice emission reduction technology must be required.

Power stations must be required to achieve best practise emissions limits with the aim of reducing emissions to as low as possible to protect human and environmental health. To do this the government should require all three Victorian power stations to install flue gas desulphurisation, selective catalytic reduction, fabric bag filters, and activated carbon injection. These pollution control technologies are frequently used in jurisdictions with stricter air pollution regimes such as the European Union and the United States of America.[ix]

To be an effective policy instrument, Victoria's Air Quality Strategy must address air pollution and greenhouse gas emissions from coal burning power stations. It should extend on any positive changes made as a result of the EPA's review into coal power station licences and should facilitate the implementation of best practice pollution controls for these major polluters.

3. Implement a suite of policies to accelerate the shift to renewable energy and increase energy efficiency to reduce the need for fuel combustion

The government can also promote reductions in climate and air pollution from coal-burning power stations by accelerating the shift to renewable energy and increasing energy efficiency, which reduces the need for polluting fuel combustion.

The Victorian government has made positive steps on this front by legislating the Victorian Renewable Energy Target and increasing the Victorian Energy Efficiency Target.

Additional steps the government can take to build on this progress and continue reducing demand and reliance on polluting coal fired power include:

3a. Drive programs and scale up policies to bring online new clean energy projects. This could include committing to bringing online 1000 megawatts (MW) of large-scale renewable energy each year for the next four years to meet the Victorian Renewable Energy Target (VRET) of 5400 MW.

3b. Committing to improve energy efficiency across Victoria. This could be achieved by increasing the targets under the Victorian Energy Upgrades Program beyond 2020, improving building standards for new residential buildings and for rental properties and creating a plan to repower 250,000 homes with solar and energy efficiency. Industrial and large energy users can be supported to increase their efficiency by re-establishing the Environment and Resource Efficiency Plans (EREP) program. This program required large energy users to review and audit their energy use and greenhouse gas emissions, identify measures to increase energy efficiency, and implement plans for actions with a payback period of three years or less.

Promoting residential solar and energy efficiency has the added benefit of not only reducing demand on coal power during peak times, but also reducing residential reliance on wood burning for heating, which is another major source of air pollution that has significant health consequences.

Read more about these recommendations in Environment Victoria's 2018 Election Policy Agenda. [x]

4. Empower communities and work towards environmental justice

Victoria's Air Quality Strategy should embody the principles of environmental justice. Environmental pollution can have more severe impacts on already vulnerable communities, for example the residents of the Latrobe Valley, who have experienced poorer health due to pollution from coal and economic disadvantage for many years.[xi] Therefore responses to air pollution should focus on solutions and support for these communities.

To ensure affected communities have access to the information and tools they need, the government should urgently improve access to air monitoring information, ensuring data from the Victorian government and industry is immediately and openly accessible to the public. We note that the recently introduced *Environmental Protection Amendment Bill* 2018 proposes significant improvements in public access to information.

Environment Victoria supports the statement's aim of empowering communities, including proposals to better partner with communities to identify and address local air quality challenges that affect them, using innovative approaches to minimise pollution sources and emissions.

5. Explore other recognised ways of reducing air pollution

The government should explore the following key actions to reduce Victoria's air pollution:

5a. Strengthen Victoria's air pollution laws. Including updating the State Environment Protection (Air Quality Management) and State Environment Protection Policy (Ambient Air Quality). Especially to clarify the EPA's role in reducing greenhouse gas pollution, which has been a major source of uncertainty in Victorian climate policy.

5b. Subject big polluters to stricter tests and restrictions. Thresholds in Works Approvals, Licence Applications and Renewals and Environmental Effects Statements must be tightened to prevent the commissioning or approval of new facilities that cause significant amounts of air pollution. The strategy should require heavy emitters to install the best available pollution reduction technologies and controls.

5b. Expedite the introduction of a load-based licencing scheme by removing legislative barriers, consistent with the recommendations of the 2015 Independent Inquiry into the EPA.[xii]

5c. Move Victoria towards zero emissions transportation. This could include measures such as: 1) Banning diesel trucks on residential streets; 2) Investing resources in structural change that avoids creating traffic pollution in the first instance, ie. investing in expanding and upgrading Victoria's public transport, cycling and pedestrian infrastructure; 3) investigating state-based measures to encourage greater vehicle fuel efficiency and increasing the uptake of electric cars.[xiii]

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[i] Australian Institute of Health and Welfare, (2016) 'Australian Burden of Disease study: Impact and causes of illness and death in Australia.' <https://www.aihw.gov.au/getmedia/d4df9251-c4b6-452f-a877-8370b6124219/19663.pdf.aspx?inline=true>

[ii] Annika Dean, Donna Green, UNSW, (2017) 'Climate Change Air Pollution and Health in Australia.' <http://www.grandchallenges.unsw.edu.au/sites/default/files/uploads/UNSWA_224086_Climate%20change%20blueprint%20project_AirPollution_FINAL.pdf>

[iii] Clean Energy Regulator, "Electricity sector emissions and generation data 2015-16"

[iv] National Pollutant Inventory, 'Air emissions reporting facilities 2013-17'< <www.npi.gov.au>
(NB: This excludes emissions from diffuse sources like cars and residential fire places)

[v] Clean Energy Regulator, "Electricity sector emissions and generation data 2015-16"

[vi] National Pollutant Inventory, 'Air emissions reporting facilities 2013-17'

[vii] Clean Energy Regulator, "Electricity sector emissions and generation data 2015-16"

[viii] Environment Protection Authority, (2018) Brown coal-fired power station licence reviews <https://www.epa.vic.gov.au/our-work/licences-and-approvals/improving-the-system/licensing-improvement/brown-coal-fired-power-stations-licence-reviews>

[ix] Environmental Justice Australia, (2017) 'Toxic and terminal'.

[x] Environment Victoria, (2018) 'Election 2018: How Victoria can lead the way' <https://environmentvictoria.org.au/our-campaigns/organised-communities/2018agenda/>

[xi] Hazelwood Mine Fire Inquiry, Health of the Latrobe Valley, <http://report.hazelwoodinquiry.vic.gov.au/part-four-health-wellbeing/health-wellbeing-background/health-latrobe-valley.html>

[xii] Environment Protection Authority, (2015) Inquiry Report <http://www.epa-inquiry.vic.gov.au/>

[xiii] Measures to increase update of electric cars could include options such as: offering cheaper registration for less polluting cars; setting a target for 5% of all new car sales to be electric vehicles or plug-in hybrids over the next five years; allow EVs to use high occupancy lanes; cut stamp duty and provide a five-year registration holiday for all electric cars; Set an ambitious emissions target for Victoria's government fleet; Offer rebates to build public charging stations, with rebates targeted to areas where they are needed to build a network that avoids clusters in affluent areas.