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What organisation are you from?

Australian Paper

What do you think are the best value actions listed in the statement that are likely to help improve future air quality?

“Improving our understanding of where and when air pollution occurs: • Renewing and expanding our air quality monitoring network — such as increasing the number of monitoring stations across Victoria, increasing the amount of mobile equipment to better assess air pollution from events such as industrial accidents, planned burns and bushfires, increasing monitoring of emissions at pollution hotspots such as major roads and industrial areas” Sound science should be the basis for strategies to improve air quality in Victoria. As such, reliable data on the sources of pollution and their resulting impact on air quality – particularly those diffuse sources not currently monitored – should be the foundation of strategy in this area.

How would you build on or vary these actions?

The action of “Strengthening Victorian equipment standards, such as for wood heater emissions” should also be expanded to include vehicle emissions. It is also important that these new standards would not be retrospective – it would not be fair to penalise the public or industry who have purchased / installed equipment that was compliant with previous standards. Rather there should be innovative programs to incentivize the uptake of new equipment or modification to existing equipment to meet the new standards. The action of “using the planning system to encourage the development of walkable neighborhoods...” should also include consideration of adequate public transport to further reduce reliance on motor vehicles. The action of “increasing investment in science to identify risks and trends” should have a focus on what are safe air quality levels rather than “zero emissions”. The action of “increasing the amount and accuracy of air quality information available in a range of formats like websites, social media and smart phone alerts, in real time” should be focused on delivering simple and clear messages to the community rather than large volumes of information – though it is acknowledged that this is a complex task. It may also be useful to include this information in other media formats i.e. radio and television news (perhaps include with the weather report) as it should be acknowledged that not all community members have access to or the desire to use internet services.

Do you have any suggestions for further actions?

Any strategy for clean air needs to include assessing and quantifying the impacts of planned burns and bushfire on Victorian communities. This information should then be used to inform a review of how these issues are managed – are there alternative ways to manage fuel loads which could reduce emissions from planned burns while minimising potential for large scale bushfires? The development of the smoke forecasting system (p 7) looks to be a useful tool for the public – what is the timing for this to be released? Separation distances between industry and sensitive uses is important for both communities and industry. There needs to be a stronger focus on this. While “reverse buffers” are protected by the current planning scheme provisions, better more transparent protection by overlays should be implemented for significant industrial areas.

Are there any air quality actions you believe should be avoided? Why?

Development of a statewide emissions inventory should be avoided unless it is planned to utilise data already available via the National Pollutant Inventory and other existing data sources. Development of a separate inventory for Vic will take significant resources and may result in confusion between National and State data, difficulties comparing data between states, and a duplication of reporting requirements for industry and government bodies (if data was to be supplied to both State and National inventories).

Are there particular areas of air quality (either pollution sources or geographic regions) you think the government should target for improvement? Why?

The VAGO report "Improving Victoria's Air Quality" (Mar 2018) noted that "EPA does not collect information on the quality of ambient air for most parts of the state, including many parts of metropolitan Melbourne. Its network of ambient air quality monitors is limited to parts of the Port Phillip and Latrobe Valley regions". As such using a risk based approach to prioritise installation of monitoring equipment in the geographic areas currently without any would contribute to the sound scientific basis for strategies to improve air quality in Victoria in the future.

Are you able to provide any data or information that will help government assess the feasibility and cost-effectiveness of air quality management actions?

No

Do you have other suggestions on how to secure a clean air future?

Not at this time, though we will continue to engage as this review progresses.