

Submission in response to Victoria Clean Air Statement

Sue McKinnon

Comments for consideration for the Air Quality Statement are in red, below.

Regards

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These are the actions that I believe the Government should include in the Air Quality Statement.

I do not address the concern of “value”. Cost efficiency needs to be addressed by the emitters. These are essential services to protect the health of the community and protect from high medical and emotional costs of death and illness caused by air pollution

If government does address cost / benefit ratios, then costs need to include the full health costs of death, hospitalisation, and lifelong illness attributable the emissions considered. Mental health costs of those affected and their families and carers need also to be included.

1. What do you think are the best value actions listed above that are likely to help improve future air quality?

Monitoring

Increase number of monitoring stations to ensure all of Victoria is covered. Ensure they have back up power. Action portable stations in unexpected or seasonal pollution events such as dust storms or fires. Provide additional portable stations available for community citizen science use. Improve cumulative reporting.

2. How would you build on or vary these actions?

Reporting

Regularly report on Health and hospitalisation data which may be linked to air pollution

3. Do you have any suggestions for further actions?

Emissions control days should be enacted and enforced in the same way that fire bans days are declared and enforced

EPA needs to be the sole emissions control agency. Councils do not have the knowledge to act in this process

Reporting The community is exposed to information about death and injury caused by fires, yet that caused by smoke is not readily available.

Statistical data on death and illness impacts of smoke all smoke events. Such events occur after prescribed burns; post industrial logging burns; wood fired power or heating equipment use; bushfires; agricultural stubble burns . In some cases the precise cause of the smoke event may be several emissions sources and can be reported as such. In other cases, single sources may be proven. The data needs to be collected and reported in short time periods such as daily or weekly in order to provide useful information on causes of adverse health impacts and potential and need to reduce emissions from these sources

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

Post – Industrial Logging burns need to be prohibited

These burns are highly polluting. Alternative direct planting or direct seeding needs to be used if Clear Fell logging of native forest continues (which I believe it should not)

If Post industrial logging burns continue, the emissions need to be treated as industrial pollution – carbon emissions will need to be counted and addressed in any carbon emissions accounting system. Particulate emissions need to have maximum levels and be monitored on site. Toxic pollution from incendiaries needs to be monitored and controlled.

Prescribed burns need to be addressed as polluting process. Emissions from prescribed burns need to have maximum levels, and be monitored at the source. Smoke from any wood fire impacts our health. Death and illness caused by prescribed burn smoke needs to be monitored and reported (see above) to ensure that the community are aware of the impact of prescribed burns and the need to reduce the emissions from these

Prescribed burning processes aim to remove small diameter material. With monitoring and maximum emissions levels applied, impetus will be on improving the process and timing to reduce emissions and health impacts Clear Fell logging of native forests need to cease

Clear fell logging of native forests causes more release of stored carbon than alternative plantation processes. The stored carbon of native forest is only restored to about half of the stored carbon before the forest area is logged again – thus the massive stored carbon of native forests is reduced by one half (our Mountain ash forests currently logged at around 3000 Ha pa contain up to 1900 tC/Ha ..more carbon storage per Hectare than any forest in the world.

The product from native forest harvesting is predominately smoke (30 % of the biomass removed enters the atmosphere directly in post industrial logging burns) and paper (28 % of the biomass removed becomes short lived paper). Only 4 % of the biomass removed becomes longer lived wood products, and half of this is pallets which end up rotting in landfill within months.

Burning off needs to be prohibited in peri urban areas at least and assessed in rural areas.

Composting of green waste is a cleaner alternative and readily available to peri urban residents in Council facilities. Land space is available for rural residents to compost their own green waste.

Proximity to population in peri urban areas means that burning off impacts many. It is often moist, green wood and leaves which are burnt in these residential burns

The impact of Domestic Wood Fires need to be addressed particularly in peri urban areas

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

Smoke in peri urban areas

6. 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

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

Increased community awareness of adverse health impacts of air pollution, particularly smoke impacts. Regular reporting is required for this.

Emissions control days (see response to 3. Above) will also increase awareness

Environmental Laws and human resources need to facilitate enforcement of emission control.

Do not make it worse!! All new proposals need to have forecasted emissions calculations published at the initial proposal stage. Air Quality impacts of all government funded or subsidized proposals need to be addressed by the EPA against the Air Quality Statement objectives before the proposal goes beyond initial stage.