

## **Victorian Clean Air Alliance | Submission to the Victorian Air Quality Statement**

The Victorian Clean Air Alliance is a united voice of Victorian citizens and community groups who want to ensure Victoria's air is as clean as possible. We represent people across all Victoria whose health and wellbeing is impacted adversely by air pollution from a range of sources. These include diesel and other vehicle pollution, coal-fired power station pollution and other heavy industry emitters, industrial logging and fuel reduction burns pollution, and pollution from open air burning on residential properties and farms, and woodsmoke heaters.

We want to ensure that any plans initiated and embarked on by the Victorian government to reduce air pollution puts human and environmental health at the fore of its considerations rather than focussing on "cost effectiveness".

These are the actions we believe the government should take to reduce our exposure to air pollution and safeguard our health:

1. Aim to reduce or eliminate pollution rather than manage it.
2. Develop an independent whole of government approach to developing priorities and processes including the Health Department and Local Government so that whole community costs including health impacts of pollution are taken into account and communicated to all Victorians.
3. Strengthen Victoria's air pollution laws.
4. Remove open air burning and wood heating regulation from Local Government responsibility as they do not have the knowledge, capability or resources to assess, monitor or enforce meaningful control over air pollution.
5. Ensure the EPA has the capacity and clout to enforce laws and recommendations.
6. That the EPA makes addressing the regulation of greenhouse gas pollution a priority.
7. Ratify the Minamata Convention on Mercury and advocate for national mercury standards to match world's best practise.
8. Assessment of new projects
  - a. Don't give approval of major new polluting projects and agreements, including new burning facilities and Regional Forest Agreements
  - b. Publish independently evaluated potential pollution impacts of all proposed significant projects and agreements as part of an independent and transparent process of assessment.
9. Air monitoring

- a. Increase the number of air monitoring stations for better coverage.
- b. Provide mobile air monitors for assessing neighbourhood air pollution including industrial, vehicle, biomass (wood heating and residential, rural orchard/vineyard bushfire management burn offs).
- c. Improve access to air monitoring data. Including providing a publicly accessible real time API or at least timely raw data sets.
- d. Take ultrafine particles into account when measuring air pollution (e.g. PM1).
- e. That the EPA regularly monitor the levels of NOX, SO2 and fine particles at busy city and suburban sites and report those to the public as well as to the national air quality authorities and federal and state health authorities
- f. Increase monitoring so that pollution data is immediately accessible to community when industrial logging burns are planned.
- g. DELWP should require monitoring of all burning on public land to estimate both the quantity of pollution and the air quality. This should be reported to the EPA and the Health Department and be publicly available in real time. Any public health concerns about air pollution should require cessation of burning.

#### 10. Reporting

- a. Provide a way for the community to report pollution incidents including smoky trucks.
- b. Provide a regular report to the community on what the pollution load is, including international benchmarked pollution indicators and steps being taken to address known pollution sources and risks.
- c. EPA provide transparency about air pollution concerns reported by the community through mapping and other representation and feedback. No feedback or visible representation discourages reporting as it seems futile.

#### 11. Heavy industrial polluters

- a. Introduce an emissions reductions program for heavy industrial polluters such as coal-fired power stations.
- b. Introduce a program requiring heavy industrial polluters to engage in best available pollution technology implementation programs.
- c. That the necessary legislation be passed to allow the EPA to take companies that breach their licences to the County Court where greater financial penalties can be imposed.

#### 12. Transport

- a. That the EPA advocates for world best practice standards for all light vehicles to be adopted at national level in Australia.

- b. That the EPA advocates for diesel emission standards that are the same as those for all vehicles.
- c. That the EPA recommend to local authorities where pollution levels are found to exceed national standards near dwellings, that a local ban on diesel traffic be instituted.
- d. Phase out old trucks and take steps to phase out diesel vehicles.
- e. Put more freight on rail.
- f. Implement more truck bans and curfews on non-local trucks in residential areas.
- g. Address land use issues that result in shipping containers being transported through residential areas.
- h. Identify schools and early learning facilities impacted by air pollution and implement air pollution protection measures at impacted schools and facilities.
- i. Ban idling where cars are waiting for passengers, such as out the front of schools and in front of stations and shopping areas.
- j. Introduce air pollution buffer zones into the Victorian Planning Scheme.
- k. Encourage and help fund and facilitate clean air initiatives at the Port of Melbourne.
- l. Address air quality mitigation measures associated with the West Gate Tunnel Project (WGTP), including: tunnel filtration; pollution barriers; buffers to sensitive land use; monitoring near the tunnel portals; and clarity around ongoing monitoring.
- m. Assess air pollution from the Burnley Tunnel and retrofit improved air quality mitigation measures.

### 13. Industrial logging burns

- a. VicForests must immediately stop the practice of burning industrially logged areas for regeneration of state forests.
- b. The Department of Finance and Treasury should cost the public health impacts of air pollution events and any air pollution from “regeneration” burns as part of the accounting of VicForests.
- c. VicForest Board should be tasked with seeking regeneration of industrially logged coupes by other methods (such as planting tube stock). If this is not financially viable then logging of public forests in Victoria should cease. The Victorian Department of Treasury and Finance should oversee this action.
- d. All legislation related to the timber industry on public land in Victoria should be reviewed to ensure strict accountability for any “regeneration” burning. This should require “regeneration” burns to be classed as an

industrial air pollution requiring full accountability, measuring, monitoring and accountability.

#### 14. Wood heaters and stoves

- a. Government should initiate sustained community education based on current research with meaningful details and comparisons to other air pollution regarding the amount and toxicity of air pollution from wood smoke and the risks of harm (e.g. see [woodsmoke.3sc.net](http://woodsmoke.3sc.net) for details and examples from around the world).
- b. Community education must include the actual behaviour of wood smoke, its capacity to infiltrate into buildings and collect and remain for extended periods at low levels in some weather and landform conditions.
- c. Phase out all log burning wood fireplaces, heaters and stoves through a limited period of facilitated replacement with non-polluting alternatives, including no new permits, required removal on sale of property, pollution tax on those existing supporting subsidised replacement.

#### 15. Open air burning (currently under Local Government law)

- a. Community education is needed to address deeply entrenched cultural valuing of burning off, “cleaning up” by burning and seeing biomass smoke as natural and reasonably harmless and easy to avoid.
- b. There is an imbalance between Government information on bushfire risk and the known impacts of smoke on human health. Air pollution is a silent killer and causes extensive ill health impacting on our community which is not being communicated clearly. This imbalance in information must be rectified.
- c. Open air burning currently occurring under the guise of fire prevention in residential and rural areas is often unnecessary for fire prevention and does not meet the local law regulations. Local Government is not sufficiently protecting the community from smoke air pollution, has no monitoring equipment, inadequate resources and knowledge. This must be fixed or responsibility transferred to the EPA with proper resourcing.
- d. Crop burning (including orchards and vineyards) must be reviewed and minimised with expert support to address biosecurity issues.

#### 16. Community education

- a. For communities to be empowered to tackle local air pollution there must be much more accessible, detailed and accurate current information available from Government on the health impacts of air pollution and capacity to see what is happening in their local area.
- b. Mobile monitoring including citizen science is needed to provide meaningful information relevant at a neighbourhood level.

- c. Current research on engagement and facilitating understanding must underpin effective communication and community education on air pollution. Interstate and overseas experience should be utilised.

**Community groups and individuals who are part of the Victorian Clean Air Alliance:**

Maribyrnong Truck Action Group  
Lighter Footprints  
Newlands Friends of the Forest  
Nillumbik Friends of the Great Forest  
Climate Action Moreland  
Moreland Community Action on Transport  
Power-Less Pty Ltd  
Knitting Nannas of Toolangi  
Voices of the Valley  
Families for Healthy Air

Contact: [victoriancleanairalliance@gmail.com](mailto:victoriancleanairalliance@gmail.com)