

Air Quality Coordinator
Department of Environment, Land, Water and Planning
PO Box 500, Melbourne, VIC 8002

By email: air.quality@delwp.vic.gov.au

Dear Sir/Madam

I am writing to you in response to your request for industry feedback on the Victorian Clean Air Statement.

First of all, I would like to acknowledge the consultation process that has been undertaken by the Victorian Department of Environment, Land, Water and Planning (DELWP) so far. As the peak industry body representing the solid fuel heating industry, the Australian Home Heating Association (AHHA) believes the best environmental outcomes are achieved when industry and government work together to develop practical regulatory solutions.

The AHHA strongly supports the Victorian Government's goal of improving air quality - this is a worthwhile policy goal the solid fuel heating industry is doing its part to achieve. To that end, the industry has been a strong proponent of inserting the Australian standard for wood heaters into enforceable regulation – this reform, combined with proper enforcement and consumer education, will lead to the most tangible reductions of particulate emissions from wood heaters.

The AHHA does not support any change to wood heater emissions at this point in time – this would impose a great cost on the industry, for little environmental benefit. Any changes to the wood heater standards would also mean that Victoria falls out of line of the Australian standards, which will create issues of compliance for the industry. The industry has been instrumental in improvement of standards for wood heating appliances and has over the past five years has spent millions of dollars ensuring appliances are compliant with the requirements of the 2019 Australian Standards.

The AHHA also seeks more detail about what constitutes “best practice management” for the reduction of emissions from wood heaters– to date, the AHHA has not received any advice from the EPA about this despite our requests for more information.

Rather than changes to Australian wood heater standards, the AHHA believes the biggest environmental and air quality improvements will come from the following actions:

- Better consumer education – the Victorian Government should consider more a comprehensive consumer education programme about the best way to use a wood heater and the types of fuel that should be used, and an education campaign will help rectify this issue. A large percentage of particulate emissions come from consumers not using their units correctly. The AHHA has produced a series of educational short videos which can be used for educational purposes. These can be viewed: <http://www.homeheat.com.au/how-to-videos>
The AHHA stands ready to partner with and advise the Victorian Government on rolling out an education campaign.
- Proper enforcement of current standards – much attention is given to tightening wood heater standards. The 2019 Australian Standard is the toughest standard yet for the operation and efficiency of wood heaters, however there is little work done to improve enforcement of these standards. This means the worst emitting units continue to be sold by disreputable suppliers, while those doing the right thing continue to invest in meeting higher standards. These disreputable suppliers are often able to offer consumers cheaper units, and consumers are often unaware the product they purchased does not meet the required standard.

With the proper enforcement of the current Australian standards for wood heaters and firewood, the AHHA believes there will be a tangible improvement in air quality by removing higher emitting units and poorer quality fuels from sale.

Also, as wood heating is a popular and affordable source of heating for Victorians, any cost increases for industry that are associated with becoming compliant with a separate Victorian standards regime will likely be passed on to people who rely on the products the most. For many Victorians, wood heating allows consumers to enjoy a cheap source of heating, particularly in areas without access to gas heating.

As a general point, the AHHA again calls on the Victorian Government to update its evidence base on the sources of poor air quality. Much of the quoted data is either general in nature or many years old. This is not a credible evidence base to build sensible public policy.

I would be happy to speak with you further about the contents of this submission and I can be contacted on 08 8132 1577 to discuss this issue further.

Yours Sincerely,



Demi Brown
General Manager
Australian Home Heating Association

About the AHHA

The AHHA is the peak industry body representing over 250 manufacturers, retailers, installers, maintenance companies and the firewood sector in the solid fuel heating industry, which employs over 10,000 Australians nationwide. Most of our members are small and medium sized businesses. In rural and regional areas in particular, solid fuel heating is a popular and affordable source of home heating.