

8 April 2021

Inquiry into health impacts of air pollution in Victoria
Submission 50

The Secretary
Economy and Infrastructure Committee
Parliament House, Spring Street
EAST MELBOURNE VIC 3002

Submitted via online form

RE: Inquiry into Health Impacts of Air Pollution in Victoria

The Australian Home Heating Association (AHHA) welcomes the opportunity to make a submission regarding the Inquiry into Health Impacts of Air Pollution in Victoria.

The AHHA represents manufacturers, retailers, installers and maintenance service providers in the wood heating industry. Our members employ over 10,000 Australians nationwide and support appliance manufacturing operations in Victoria. The AHHA considers that wood heater appliances are the most effective means of heating our homes in Australia, and that the reduction of wood-smoke emissions should be a shared approach between government and industry to develop practical regulatory solutions.

The AHHA is committed to creating solutions to achieve improved air quality outcomes, that are both environmentally and financially sustainable. The AHHA suggests that the best way to address concerns regarding the health impacts of air pollution in Victoria is to increase awareness about wood heater, for efficient operation while minimising emissions. Community awareness campaigns should be co-designed by industry and government to ensure the messaging is factual and understood by the community and industry stakeholders.

Australian solid fuel heating standards

Under the 2019 Australian standards wood heaters are subject to rigorous and comprehensive regulations, for the operation and efficiency of the units. The Wood Heating Industry was a key contributor in the development of the standards that required industry to meet the 1.5 grams of particulate emissions per kilogram threshold, reducing emissions by approximately 63 per cent over the last 10 years. The voluntary reduction in emissions, driven by industry, has seen emissions reduce from 4gm per kg down to 1.5gm per kg.

The appliance particulate emission factor set out in AS/NZS 4013 must be reported on a permanent label attached to the appliance.

Wood heaters manufactured and sold after 2019 must comply with:

- AS/NZS 4012:2014 – Domestic Solid Fuel Burning Appliances – Method for determination of power output and efficiency.
- AS/NZS 4013:2014 – Domestic Solid Fuel Burning Appliances – Method for determination of flue gas emission.

All appliances sold in Australia must be tested by a registered laboratory with National Association of Testing Authorities (NATA) for compliance. Appliances are tested to meet the current standards further demonstrating industry's continuing commitment to consumers, the community and the environment.

The AHHA continues to work with governments to ensure wood heater appliance standards are relevant and meet customer, government and industry expectations.

A Policy framework is critical to ensure manufacturers continue to invest in innovation. Through a framework industry can improve design standards to reduce emissions.

Old and non-compliant wood heaters

The AHHA is supportive of phasing out non-compliant wood heaters and that households should be financially assisted to replace old wood heaters with new compliant lower emitting appliances. Second hand, non-compliant wood heaters can contribute to excessive emissions and measures should be placed to ensure these units are not offered for sale and installed in households.

Air quality can have various contributing factors including geographic location. We know from research that in some rural and regional areas, firewood is used as their main source of heating, accounting for 10 per cent of households in Victoria¹. Wood heating is a popular and affordable option amongst all other domestic sources of heating for a range of reasons including financial, aesthetic and geographic. Over 50 per cent of people with wood heaters, the key reasons for their choice of heater given are cost and savings on energy bills². In addition, the attributes that users liked the most about their wood heater were effective heating and ambience.³

For many Victorians, wood heating provides a cost efficient form of heating by using plantation fire wood, particularly in areas where there is little alternative. According to 2018 data, wood heaters are the second most cost efficient heating option, behind heat pumps. Some households may have access to free firewood, therefore reducing the cost further.⁴

The AHHA would suggest that all factors should be considered when reviewing air quality, and the suggested link to wood heaters. Imposing unnecessary restrictions on households would be unreasonable and impractical. Furthermore, consumer expectation should also be a factor. Wood heating is a desirable source of warmth for many, at a reasonable cost.

We support and recommend incentivising households to replace old non-compliant wood heaters, as a subsidy or rebate. This would support Victoria's Air Quality Strategy.

Education Campaign

There are a wide range of factors that contribute to poor air quality including, but not limited to, location, weather, industrial emission, car emissions and the incorrect use of solid fuel by households.

¹ ABS. 4602.0.55.001 - Environmental Issues: Energy Use and Conservation, Mar 2014, accessed 22 March 2021

² ABS. 4602.0.55.001 - Environmental Issues: Energy Use and Conservation, Mar 2011, accessed 22 March 2021

³ Motivations and Barriers for Choosing Wood Heating (2014), The Square Holes

⁴ Comparison of Residential Heating Costs for Electricity, Gas, Firewood and Pellets (2018), The University of Adelaide p.19

