

Air pollution Inquiry>

Ms Carly Dober

Organisation Name:
Your position or role:

YOUR SUBMISSION

Submission:

I am a 31 year old psychologist alarmed at the lack of initiative by the government in keeping people physically and mentally air with limiting air pollution.

The overwhelming industrial source of air pollution in Australia and Victoria is coal-fired power stations. Coal-fired power stations disproportionately impact the communities living near them, making it one of the most significant environmental justice issues in Australia.

Victoria's air pollution standards do not adequately protect health and lag significantly behind other regions, including the USA, the EU and China, where most coal-fired power stations are required to install basic pollution controls that cut toxic pollutants by more than 85 percent. The Victorian government needs to act on the worst sources of toxic air pollution now. That means reducing pollution from major sources – coal-fired power stations, vehicle emissions and wood heaters.

Every year, approximately 2600-4800 people in Australia die as a result of exposure to toxic air pollution, at an annual health cost of \$24 billion. The most recent analysis of health impacts caused by coal-fired power stations in Australia found that they contribute to 845 babies being born with low birth-weight, 14,434 children with asthma, and 785 premature deaths each year, at a cost of \$2.4 billion dollars to the economy.

These are the following recommendations, copied and pasted from the People's Clean Air Action Plan for Victoria, that are most important to me:

COAL:

By September 2021, establish a comprehensive plan that sets out specific and enforceable obligations for coal-fired power station operators to achieve Best Available Control Technology (BACT) emissions levels, including the following elements:

- BACT short and medium-term emissions limits for PM10, PM2.5, SO₂, NO_x, and Hg.
- Continuous emission monitoring (CEMS) for CO₂, PM2.5, SO₂, NO_x, and Hg, to be installed, maintained and operated, with real-time posting on a publicly available website.
- A requirement that CEMS be maintained and operated in accordance with international best practices, including annual relative accuracy test audits and quarterly relative accuracy audits.
- Use of the U.S. National Institute of Standards and Technology (NIST) “non-nulling” or the equivalent reference method to measure stack flow rate of stack gases.
- A maintenance plan, with specified replacement of parts at intervals based conservatively on prior maintenance history and on-site storage of critical components affecting emissions (such as filter bags, SO₂ and NO_x reagents).
- An immediate reduction in generation to the lowest level necessary to maintain grid stability and initiation of shutdown procedures for any malfunction that cannot be resolved within a specified period of time.
- The use of the cleanest available fuels during any period where a pollution control is not operational (e.g., before the unit reaches the operating temperature needed by its selective catalytic reduction (SCR)).

Immediate reporting of any upset conditions to the agency and the public. The agency should thereafter investigate and post the results of its review.

- Shutdown of the unit if monitoring device availability falls below acceptable levels.

VEHICLES:

By September 2021, develop a comprehensive plan to reduce vehicle pollution, with a focus on vehicle pollution hotspots, including the following elements:

- Low emissions/cleanair zones targeting diesel freight trucks in high-traffic urban areas.
- Anti-idling regulations to require engines be stopped when a vehicle is stationary for more than 1 minute, particularly near vulnerable community locations such as schools and childcare centres.
- A levy or restricted access to the Port of Melbourne for non-Euro6/VI compliant heavy vehicles.
- Incentives for freight operators to upgrade to Euro 6/VI compliant vehicles.
- A commitment to revise urban planning in ports areas with a view to achieving clean air outcomes.

WOOD HEATERS:

By September 2021, implement a plan to phase-out wood heaters, including the following elements:

- Progressive restrictions on the use of wood heaters during periods of increased air pollution risk and/or unfavourable weather conditions.
- Require the removal of wood heaters from homes upon sale.
- Subsidise insulation upgrades and heat pump installations for houses that remove wood heaters.

AIR QUALITY MONITORING:

By September 2021, develop an air quality monitoring plan that increases the level of, and access to, air quality monitoring and information, including by:

- Installing and/or increasing permanent air quality monitoring stations in every community that is near a major industrial source of pollution, such as coal-fired power stations. Implementing localised monitoring networks in areas with large traffic flow and with high wood-burning heater usage, including the use of low-cost monitors.
- Ensuring access to monitoring data be made available in real-time, on a single website maintained by the EPA.
- Ensuring both current and historical data be made available in downloadable datasets to coincide with the implementation of the Environment Protection Act 2018.
- Funding and implementing an AirSmart health promotion campaign to minimise the health impacts of poor air quality.

A VICTORIAN INVENTORY:

Action: The Victorian EPA to complete and publicly release the Victorian air pollution inventory by September 2021, and to update it at least every 3 years.

Action: By September 2021, coal mine and coal-fired power station pollution to be reported separately in the National Pollutant Inventory.

Enough with the regulatory capture. Enough with big industries making policy decisions in lieu of evidence based health initiatives.

FILE ATTACHMENTS

File1:

File2:

File3:

Signature:

Carly Dober