

Air pollution Inquiry

Dr Henry Jennens

Organisation Name: Healthy Futures

Your position or role: Co-ordinator

YOUR SUBMISSION

Submission:

22/4/2021

Healthy Futures Submission to the Inquiry into Health Impacts of Air Pollution in Victoria

Dear Victorian Parliament Environment and Planning Committee,

Thank you for the opportunity to submit to this Inquiry. (I also attach a pdf copy of this submission and copies of previous correspondence from our organisation to EPA Victoria, included as 10 and 11 in the references).

By way of background, Healthy Futures is an organisation of healthcare workers and other concerned community members in Australia advocating to reduce pollution and its health impacts. We are an affiliate group of Friends of the Earth Australia. We have a “Healthcare for Clean Air Gippsland” working group involving health professionals in the Latrobe Valley and other areas of Gippsland, and a similar working group in the Hunter and Central Coast regions of New South Wales.

We are deeply concerned about preventable harm and death currently being caused by air pollution in Victoria.

Air pollution can harm human airways and lungs, exacerbating and sometimes causing respiratory diseases. Some pollutants can be absorbed into the bloodstream and, like toxins in cigarette smoke, can potentially harm any organ in the body, including the placentas of pregnant people and their developing babies. Children born after being exposed to air pollution in the womb may suffer ill health effects later in life as a result [1].

A report published in 2020 [2] estimated that every year in Victoria pollution from coal fired power stations causes 195 premature deaths, 248 cases of low birth weight and 4,188 instances of children experiencing asthma symptoms. These estimates were derived by taking pollutant emissions data, running this through a meteorological model to estimate where the pollution would be distributed, and then using population data to estimate health impacts. While the report published health impact estimates at the state level only, the researchers are able to use the same technique to estimate health impacts in specific local government areas. They have estimated that in Latrobe City Council pollution from coal fired power stations causes 17 premature deaths, 11 cases of low birth weight and 217 instances of children experiencing asthma symptoms every year, and that in the whole of Gippsland it causes 37 premature deaths, 33 cases of low birth weight and 580 instances of children experiencing asthma symptoms every year. They modelled the air pollution from Victorian coal fired power stations to travel at least as far as Melbourne. Because of the higher population density in Melbourne the total health impacts there are likely larger; however because pollution from the power stations is concentrated around the Latrobe Valley the estimated health impacts per person in the Valley are larger than in the rest of Victoria. For example, the number of annual premature deaths due to coal pollution estimated by the report’s authors is over seven times higher per capita in the Latrobe Valley than in Victoria as a whole. We consider this a significant environmental and health justice issue as many health parameters in the Latrobe Valley are already poorer than in the rest of Victoria [3].

Healthy Futures reviewed air quality data obtained from EPA Victoria's Latrobe Valley monitoring sites in 2019. The average airborne concentrations of PM2.5 (particles 2.5 microns or less in diameter) measured by these monitoring sites over that year, in units of micrograms per cubic metre of air, were 7.1 in Morwell South, 7.5 in Moe, 7.6 in Churchill, 7.8 in Morwell East and 8.9 in Traralgon. A 2020 study of pollution and mortality data in Queensland found that ambient PM2.5 levels above 4.5 micrograms per cubic metre of air were associated with an increased risk of death [4], and a United States study in 2017 of people aged over 60 found a similar association for ambient PM2.5 levels at least as low as 5 micrograms per cubic metre of air [5]. There is no identified "safe level" of air pollution [6]. This adds further evidence that levels of air pollution in the Latrobe Valley are causing harm.

Victoria's coal fired power stations are currently permitted to emit pollution at levels far greater than similar coal fired power stations overseas. This was demonstrated by Environmental Justice Australia in 2017 [7] and while pollution limits for similar coal fired power stations in Europe have reduced significantly since then [8] the pollution limits for Victoria's coal fired power stations have not [9]. In 2018 Healthy Futures wrote a submission to EPA Victoria's review of the licence conditions for Victoria's coal fired power stations, calling for the EPA to require reductions in harmful pollution in line with best international practice [10]. In 2020 our "Healthcare for Clean Air Gippsland" group delivered a letter to EPA Victoria's Traralgon office asking for the same, signed by eleven health organisations, including the Rural Doctors Association of Victoria, the Australian College of Rural and Remote Medicine and the Royal Australian College of General Practitioners, as well as over 200 Victorians [11]. We were very disappointed to hear in March this year that EPA Victoria had announced renewed licence conditions which didn't apparently require the power stations to adopt any new technologies to reduce their pollution at all [9]. This decision will lead to more deaths, low weight births and other health conditions in the Latrobe Valley and elsewhere in Victoria. We urge the Victorian Government to rectify this in their upcoming Air Quality Strategy by requiring coal fired power stations to install technologies in keeping with international best practice to reduce harmful pollution.

Healthy Futures are also concerned about air pollution from other major sources, including motor vehicles and wood heaters, which are likely contributing to significant harms in Victoria. Accordingly we helped create the People's Clean Air Action Plan for Victoria [12] and we endorse all of its recommendations to reduce air pollution and its harms.

With regard to heavy vehicle pollution, we further support the Maribyrnong Truck Action Group (MTAG)'s calls to:

- Implement the recommendations in the report "Air Pollution in Melbourne's Inner West: taking direct action to reduce our community's exposure" [13]
- Phase out old polluting trucks and introduce a Clean Truck Program at the Port of Melbourne
- Implement a low emission zone to protect residents in the inner west from diesel emissions
- Implement air pollution protection measures at schools impacted by traffic -related air pollution
- Introduce air pollution buffer zones into the Victorian Planning Scheme
- Install filtration on the West Gate Tunnel Project vent stacks

With regard to pollution from domestic wood heaters, we support measures to reduce this pollution as recommended in the People's Clean Air Action Plan for Victoria [12], as well as public education regarding the health impacts of wood heaters.

Finally we would like to comment on Chunxing's proposed used lead acid battery recycling facility in the Latrobe Valley. We reviewed the submissions made to EPA Victoria as part of the community consultation process around Chunxing's application for a works approval. There seemed to be about 130 submissions, out of which about four were in favour of the proposal, while the majority opposed it. Despite Chunxing's health assessment which predicted no significant health impacts from the project, many community members remain deeply concerned about possible health impacts, based in part on reports of a similar facility in California polluting surrounding areas even after the installation of wet electrostatic precipitators [14]. The

ongoing protests against the facility demonstrate continuing local community opposition to the project as it is currently proposed. When substantial community sentiments about potential health issues are expressed in this way they should be respected and appropriately addressed rather than overruled.

References:

1. Urs, F & Usemann, J 2019, 'Addressing the complexity of prenatal and postnatal environmental exposures affecting childhood lung function' *The Lancet Planetary Health*, vol. 3, no. 2, pp. E51-E52, [https://doi.org/10.1016/S2542-5196\(19\)30011-7](https://doi.org/10.1016/S2542-5196(19)30011-7)
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12. Lipski, B, Buckheit, B, James, C, Smith, M 2021. *The People's Clean Air Action Plan for Victoria*. Viewed 22 Apr 2021 at <https://www.envirojustice.org.au/wp-content/uploads/2021/02/VICTORIA-Clean-Air-Action-Plan-2021.pdf>

13. Inner West Air Quality Community Reference Group (2020). Air Pollution in Melbourne's Inner West: taking direct action to reduce our community's exposure. Viewed 22 Apr 2021 via <https://www.environment.vic.gov.au/sustainability/inner-west-air-quality-reference-group>

14. Earthjustice (2021). Quemetco's lead legacy: a cycle of injustice and contamination in Southern California. Viewed 22 Apr 2021 at https://earthjustice.org/sites/default/files/feature/2021/report-quemetco/Quemetco-Lead-Legacy_Earthjustice.pdf

FILE ATTACHMENTS

File1: [608114bc50a1f-2021-4-22 Healthy Futures Submission to Inquiry into Health Impacts of Air Pollution in Victoria.pdf](#)

File2: [608114bc51a3e-2018 HF submission re coal licences.pdf](#)

File3: [608114bc5224c-2020-12-14 health letter to EPA Victoria electronic.pdf](#)

Signature:

Henry Jennens