

Environment and Planning Standing Committee – Legislative Council
Parliament House, Spring Street
EAST MELBOURNE VIC 3002

Dear Committee members

Submission to the Inquiry into the Health Impacts of Air Pollution Victoria

I write my submission with a focus on wood smoke pollution.

I am a parent of two children aged 13 years and 16 years. I live in the northern suburbs of Victoria and I have two immediate neighbours who have wood heaters and use them as their sole source of heating. The smoke from our neighbour's wood heaters drifts down and surrounds our home. It is common to smell smoke in our home in the evenings. Both of our children have asthma. We rarely open our windows even in the warmer months of the year. For most of the year we cannot use our backyard.

Like many people we were not aware that wood smoke was harmful. Our eldest child began experiencing respiratory symptoms when she was just six months old. In her early years she was diagnosed with asthma and had four operations: grommets for recurrent ear infections, and to remove her adenoids and tonsils. Our younger child also began to experience respiratory symptoms such as bronchiolitis. We have no history of asthma or childhood respiratory problems on either side of the family.

During this time, we experienced ongoing levels of wood smoke haze from two neighbours' wood heaters. Our GP at that time raised with us if there might be environmental factors triggering our children's health issues. We began to do some research into woodsmoke and were concerned to find that it has significant health harms including that it is associated with children developing asthma.

This began a very stressful period in which we tried to protect ourselves and our children from the ongoing woodsmoke. We followed the advice on the EPA's website to talk to our neighbours. Neither of our neighbours saw anything wrong with woodsmoke and said it is 'natural' and harmless.

We tried all sorts of reasoning and strategies with our neighbours. We paid for them to have their chimney's cleaned and helped to organize for our nearest neighbour to have the flue raised. We purchased a product called 'smart burn' for them to use – that are placed in a wood heater and claim to reduce emissions. But over time it became clear that our neighbours were of the view that this was our problem and we should just seal up our house better if we didn't like the smoke.

We spent hundreds of dollars better sealing our weatherboard home. We also tried to get help from our local council. The only response they could offer was to visit our neighbours and provide instruction on correct operation. They had no stepped-up response to offer beyond that.

I also met with with local councilors and began writing to MPs (including all the Victorian Environment Ministers starting with Gavin Jennings through to Lily D'Ambrosio). I have also made numerous submissions to state and federal reviews of wood heaters. We also consulted a lawyer and I have met with the EPA on a couple of occasions. Despite all this effort very little has changed in our situation.

We also hired a particle meter to see if particles were entering our home. We found that even with all our doors and windows shut, when our neighbours have their wood heaters burning, the concentrations of smoke are at a similar level to that of having a cigarette smoker in our home.

Our neighbours did make some adjustments to their use of their wood heaters – for example, both neighbours have reduced the frequency with which they allow their heaters to smolder overnight (though on occasion this continues to occur). However, both my neighbours continue to feel affirmed in their belief that wood smoke is harmless by the fact that they are legally allowed to use a wood heater . Further, this has led them to believe that by complaining, we are simply being difficult or unreasonable. They do not see any link between wood smoke and asthma. Over the years I have asked the local council officers if they could explain the health issues associated with wood smoke to my neighbours but I have been informed on a number of occasions that Councils are not instructed by the EPA to provide education about health related issues, rather they can only focus on correct operation. . In an email the local officer wrote to me that:

‘Assuming the wood heater is operated correctly, it does remain something Council is powerless to act on as wood heaters are a legal form of heating in Victoria.’

About five years ago we decided to sell up and move. We began searching for a new house in the area. Each time we looked over a new home we would also look for neighbouring chimneys to assess whether close by neighbours operated wood heaters.

At times, both our neighbours have said they may replace their wood heaters with other heating, which has given us hope that the smoke pollution may end. However, as time has moved on neither has made any effort to do so.

Current policy on wood heaters in Victoria is not protecting residents

The Environment Protection Authority Victoria (EPA) reviewed their Waste Management Policy (Solid Fuel Heating) 2004. The EPA’s [policy impact statement](#) quantifies the total health costs from PM emissions from the use of wood heaters in Victoria at over \$8 billion over the next ten years. It also states that there is no safe level of wood smoke. Despite the scale and seriousness of the health impacts, the policy proposed to reduce wood heater pollution by just 0.4% by adopting the current Australian standard for wood heater design.

The EPA policy review provides a list of the current ways that the EPA addresses compliance and supports correct operation of wood heaters. The nuisance provisions under the Public Health and Wellbeing Act 2008 are mentioned, and it is noted that the EPA provide public information and education programs and develop neighborhood environment improvement plans. This all sounds like it addresses the problem, but it does not.

My local council has confirmed that, to their knowledge, no local council has ever issued a wood heater operator with a nuisance notice under the Health and Wellbeing Act. This is because the EPA does not have a definition of excessive smoke for wood heaters, and councils are reluctant to issue a notice if the wood heater operator has shown even a miniscule amount of cooperation in reducing emissions. It is

also very difficult for councils to effectively monitor excessive smoke because it frequently occurs at night or on weekends when council officers are not available.

The 'public information' referred to in the policy statement consists of two pamphlets about wood heaters on the EPA's website, giving tips for operating a wood heater correctly and advice about what to do if a neighbour's wood heater is unduly impacting on the community. The EPA's website suggests using dispute resolution services for neighbours who are unhappy about neighbouring wood smoke. However, given there are no penalties for excessive wood smoke (including no definition of 'excessive smoke') there is no motivation for a neighbour to agree to go to dispute resolution.

The policy impact statement notes that Local Council officers are also able to provide education through instructing wood heater owners in 'correct operation'. My neighbors have been provided with this education by our council officers on a number of occasions over the past 14 years. My neighbours understand 'correct operation' but there is no one to monitor this correct operation at 11pm at night when my neighbour turns down the air to the heater so that it smolders for hours overnight, or when he decides to burn his rubbish in his heater because he can't be bothered to put it in his bin on a cold evening. There is no one to see my other neighbour use damp wood because he has run out of dry wood. People with wood heaters can repeatedly incorrectly operate their heater because it is not possible to maintain a 24/7 monitoring system, and there are no real penalties. It is also not unusual for one or both of my neighbours to use their wood heaters in the summer months, when we may occasionally have a window open. In this instance, they may well be 'correctly operating' their wood heaters, but this is of little comfort when we find we have a house full of smoke.

The picture that the EPA paint in the policy impact document incorrectly suggests that wood smoke is being adequately addressed. For example, the document states:

'When EPA receives information from the community about potentially non-compliant wood heaters, it undertakes an assessment of the claims. There are few complaints of non-compliance. To date, investigations of alleged non-compliance has found that the heaters do meet the current requirements'.

'Nuisance smoke—under provisions of the Public Health and Wellbeing Act 2008, the owner of a property or the person causing a nuisance must take all reasonable steps to eliminate the nuisance. Smoke from wood heaters can be a nuisance dealt with under that Act. The provisions are enforced by local councils'.

However, the extent of the problem of localized wood smoke pollution is hidden for a number of reasons. There is currently a very low level of public awareness about the health impacts of wood smoke. The current education strategy of pamphlets on a website is a passive strategy, entirely out of scale to the extent of the problem. Pro-active community education is needed.

Councils in Victoria are not provided with any specific instructions on how they should deal with complaints of wood smoke pollution, there is no best practice and no consistent monitoring of responses, and consequently there is no real understanding of how this issue is being dealt with. There

is a complete absence of broader oversight of the effectiveness of local responses to wood smoke pollution.

At all levels of government, there appears to be a lack of leadership or interest in addressing the problem. I am concerned about the EPA's apparent 'hands off' approach to this issue. Other jurisdictions have been proactive in reducing emissions (for example, Launceston in Tasmania) and Victoria could look to other states and territories to gather evidence of effective responses.

I don't believe that the EPA has ever conducted an evaluation of the effectiveness of the response to localized wood smoke complaints. Does the EPA know how many times the Health and Wellbeing Act has been used to address wood smoke complaints? Has the EPA ever followed up with people who have contacted their local council about wood smoke pollution to assess the effectiveness of the council response? Has the EPA ever surveyed public knowledge about the health risks posed by wood smoke?

I am also concerned that the wood heater industry appears to have a disproportionate influence on this issue. The EPA and our local council officers have told me that industry people provide 'training' about wood smoke heater operation to local councils, and are involved in EPA committees. Where is the involvement of health experts, such as the Asthma Council, - the Stroke Foundation, Lung Foundation, Cancer Council or Heart Foundation? I think the EPA should more proactively seek the voice of people affected by and concerned about wood smoke pollution. For example, health bodies should be invited to participate on committees that look at proposals relating to wood heaters.

My situation is far from isolated. The voice of people affected by wood smoke is muted because most people don't know who to go to for support or assistance. Or they go to their local council and find the response inadequate. Or perhaps they assume like many people that the smoke is harmless because it comes from a natural source, so they simply live with it, unaware of the risk posed to their health.

In our area wood smoke is a problem that is escalating, rather than decreasing. Wood heaters are being put in extensions and new builds and are featured in real estate advertisements.

Victoria has some of the tightest regulations around tobacco smoke. A person can no longer smoke a single cigarette within 10 metres of places where children play, but smoke coming out the top of a wood heater is, in contrast, barely regulated, despite being similar in chemical composition, and of vastly higher concentrations than cigarette smoke. For example, on the gates of our children's school there is a sign that bans cigarette smoking in and near the school... Yet there is a house near our children's school with a wood heater that blows smoke over the playground where kids run around and play. As the heater is operated correctly, there is nothing the school can do about the wood smoke.

The Victorian community has a right to know about the damaging impact of wood smoke. In particular the government has a duty to inform wood heater owners they could be damaging their children's health by using a wood heater, that they could be exacerbating their own health problems and that they could be contributing to health problems in their neighborhood.

I am concerned about the longer-term impact on the health of my children and family as a result of their ongoing exposure to wood smoke. I am also concerned for the wider community because the evidence clearly demonstrates wood smoke has long term health harms.

- Wood heater smoke is a major source of air pollution in Victoria: [2006 Port Phillip region data](#) shows air pollution from human sources consists of 32% wood heater smoke, 28% vehicles and 22% industry.
- Only [about 10 percent](#) of people use wood heaters, but they affect the health of other 90 percent who don't.
- The damaging health impacts of particle pollution (PM2.5) from wood smoke are [significant](#) and [well known](#) including that for [every new modern](#) wood heater per hectare there is a 7% increase that a child under 3 years will end up in emergency; the health costs of wood heater smoke *in Victoria alone* is [estimated as \\$8 billion](#) over the next decade. Australia-wide the estimated cost is [\\$3.4 billion per year](#) or \$4000- \$5600 per wood heater per year.
- People on low incomes are most at risk as they are [more likely](#) to have health conditions and live in areas with higher numbers of wood heaters/wood burning. Children are particularly vulnerable to the impacts of smoke.
- The Victorian Auditor General [report](#) 2018 found that EPA's limited air quality monitoring is under-representing air pollution levels in Victoria including failing to detect localised air pollution impacting residential areas.
- Studies [have shown](#) that wood heater standards do not reduce emissions. In real life wood heaters produce far [higher emissions](#) - and individuals can burn damp or painted wood and allow heaters to smolder overnight.
- Local council responses to wood smoke have proven to be ineffective. Wood heater/fireplace use often occurs in evening or weekends when council officers are unavailable. The burden of monitoring smoke levels falls on neighbouring residents, often resulting in conflict and disputes, and little to no reduction in smoke levels.
- Burning wood contributes to [speeding up global warming](#) and climate change.
- The public are uninformed about the health harms, resulting in increasing numbers of heaters being installed.

In order to address this significant health and environment I ask that the EPA and the government consider the following:

- That the EPA establish a position with a focus on reducing emissions from wood smoke pollution in Victoria. Given that 60 percent of pollution over Melbourne in the winter months come from wood smoke pollution, it is incongruous that the EPA do not have a dedicated role (let alone a team) with responsibility for ensuring that there are more effective responses to this issue
- The EPA has within its powers the ability to make numerous smaller and practical changes to reduce the harm from wood smoke (such as instructing councils to provide health information about wood heaters, inviting health bodies onto EPA committees, collecting residents' views of the council's response, advocating to a health promotion agency that they prioritise this issue amongst their other health messages).
- That the EPA commit to stronger community representation in wood smoke pollution reviews and on EPA committees (such as representation by affected neighbours, medical professionals and health agencies with an understanding of the health issues).

- That the Victorian government conduct a proactive public health campaign about the health impacts of wood smoke to reduce harm from wood smoke pollution. Such a campaign will be cost-effective for the government, considering that wood smoke is estimated to have \$8 billion dollar health impact over the next ten years in Victoria. Further, that the EPA recommend that such a campaign be led by a health promotion body so that it could be integrated into other health promotion messages (and benefit from the health promotion expertise of those agencies).
- An independent assessment of the effectiveness of the current responses to localised wood smoke pollution should be commissioned– including surveying public knowledge about the health harms and looking at the outcomes of initiatives to address wood smoke in other jurisdictions. Further, in developing such an assessment the EPA should involve community representatives to have input into the study’s design (such as on a reference group) with the view to use the outcomes of the assessment to improve the current system.

I ask that the Inquiry make recommendations to **phase out wood heaters in residential areas**. This should include:

- **No new wood heaters** - Ceasing the installation of wood heaters/fireplaces and removing existing wood heaters/fireplaces upon the sale of a house.
- **Replacing wood heaters** - Introduce a scheme to phase out existing wood heaters/fireplaces and ensure they are replaced with sustainably sourced electric heating (cost efficient heat pumps), with the help of a rebate scheme.
- **Support the above with a widespread public education campaign** - about the risk to health posed by wood smoke.

Sincerely

Liz Poole

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