

VIC Air Pollution Inquiry – Submission guide

The issue

Each year, between 2616 and 4884 Australians die from exposure to air pollution and thousands more suffer serious health issues [like stroke, lung cancer and heart disease](#).¹

An important opportunity

The Victorian Parliament has launched an Inquiry into the health impacts of air pollution – it's critical they hear from those affected.

The government must reduce the health burden of air pollution by reducing toxic pollutants from controllable sources of air pollution.

Each year in Victoria, exposure to toxic air pollution from coal-fired power stations alone causes 205 premature deaths, 259 low birthweight babies, and 4,376 cases of children with asthma.² The cost of these health impacts to the Victorian economy adds up to over \$650 million each year.³ The health and economic costs associated with community exposure to other sources of air pollution such as vehicles, logging coupe burns, wood-fired heaters and other industrial activities such as smelters, are also staggering.

This is a critical opportunity to let the Government know that the Victorian community is very concerned about air pollution, and put forward clear recommendations that the Government can implement to reduce the sources of pollution that most affect our health.

We must ensure the Victorian Government understands that cleaning up the biggest sources of controllable air pollution is the most effective way to reduce the air pollution health burden.

This guide contains:

- [How to make a submission](#)
- [How to structure your submission](#)
- [Recommendations to draw on](#)
- [Useful resources and assistances](#)

¹ Institute for Health Metrics and Evaluation (IHME). Global Burden of Disease Study 2017. Seattle, WA: IHME, University of Washington, 2017. Accessed 17/06/2020: <http://vizhub.healthdata.org/gbd-compare>.

² Dr. Aidan Farrow, Andreas Anhäuser and Lauri Myllyvirta,, Lethal Power: How Burning Coal is Killing People In Australia (August 2020). Available at: <https://www.greenpeace.org.au/wp/wp-content/uploads/2020/08/GPAP-Lethal-Power-full-report.pdf>.

³ Johnson, Chris et al, 'Costs of Negative Health Outcomes Arising from Air Pollution from Coal-fired Power stations', Actuaries Institute of Australia Annual Hackathon, 19 August 2020.

How to make a submission

The Parliamentary Committee driving the Inquiry wants to hear from the community about their concerns, ideas, personal stories and solutions regarding air pollution, its health impacts, and how to reduce those impacts.

Make your submission at: <https://www.parliament.vic.gov.au/epc-lc/inquiries/article/4448>

Be sure to send in your submission before the due date – Friday 2 April.

If you have questions or would like tips on writing your submission, email Max Smith at max.smith@envirojustice.org.au

How to structure your submission

Introduce yourself

Start your submission by briefly telling the committee who you are, why you care about the issue, and why you have taken the time to write your submission.

Emphasise your personal experience or unique perspective. Do you have a health condition that is exacerbated by air pollution? Do you live close to a coal-fired power station or another source of toxic air pollution? Are you part of a local group working to protect the health of your community?

Clearly identify the issues that matter to you

It's important to signal to the committee which issues matter most to you. For example:

- Are you worried about the health impacts of exposure to poor levels of air quality?
- Are you concerned about government inaction on air pollution?
- Are you concerned about the lack of air quality monitoring where you live?

Discuss the current situation regarding this issue

Outline why this is a significant issue. For guidance, see the issue and opportunity sections at the start of this document.

Elaborate, drawing on your perspective, experience and evidence to substantiate your claims

What is your experience with air pollution? What do you know about it or why do you care? Do you have firsthand experience with exposure to air pollution? Or do you have evidence from organisations like Environmental Justice Australia or others about the impacts and solutions for air pollution?

Identify what is driving these problems

Coal-fired power stations are the biggest single source of air pollution in Victoria. Can you think of other sources that should be controlled? Eg. Vehicle pollution in the inner west, or woodsmoke and logging coupe burn pollution in your local area.

Link the issue back to the Inquiry terms of reference

Let them know how you think the Inquiry can address these issues and what you want to see overall as a result.

Recommendations to draw on:

Here are EJA's draft key recommendations to the Inquiry. You can draw on this information for your submission – but don't feel limited to the matters raised below.

- Implement the People's Clean Air Action Plan.
- Regulate and control heavy metal emissions in areas with numerous and / or large industrial emitters.
- Ban the burning of waste in logged coupes, whether private plantations or state-owned logging practices.
- Ensure that the Victorian Environment Protection Authority is well-resourced and has the appropriate expertise to ensure that air pollution laws and regulations are enforced.

The most effective way to reduce the health impacts of air pollution is to clean up these major sources of air pollution and ensure that the EPA has the resources it needs to fulfill its statutory obligations.

There are 4 key actions the government can take to reduce air pollution and protect the health of the Victorian community:

1. Finalise and implement the Victorian Air Quality Strategy, which includes strong measures to reduce industrial pollution as close to zero as possible.
2. Set strong stack emissions limits for coal-fired power stations in line with international standards, which will require operators to install continuous stack monitoring and best practice pollution controls. This will reduce toxic air pollution from power stations by more than 85% and improve health outcomes for the Victorian community.
3. Expand the Victorian air quality monitoring network to areas with particular risks to health from significant air pollution sources.
4. Set strong national health-based air pollution standards to protect health, with an exposure reduction framework in place for continual improvement of the standards.

Some facts you may wish to include:

The economic cost of premature death attributed to ambient air pollution in Australia has been estimated at up to AUD\$24 billion per year.⁴

⁴ See: Australian Institute of Health and Welfare (AIHW) (2016). Australian burden of disease study: impact and causes of illness and death in Australia 2011, AIHW, Canberra; Begg, S. (2007). The burden of disease and injury in Australia 2003, PHE 82, AIHW, Canberra; Access Economics (2008). The health of nations: the value of a statistical life, Australian Safety and Compensation Council, Australian Government Department of Education, Employment and Workplace Relations, Canberra.

Low levels of exposure to air pollution can cause adverse health impacts.⁵

The Victorian government initiated the development of an Air Quality Strategy in 2018 which has not been finalised.

According to the Victorian Auditor General's Office (VAGO) audit of Environment Protection Authority (EPA) air monitoring obligations, the EPA does not currently produce a reliable or representative measure of ambient air quality across the state, hasn't implemented the requisite monitoring required under the *National Environment Protection (Ambient Air Quality) Measure*, and does not collect information on air quality for most of the state despite being required to do so under air pollution law.⁶

Australia, and Victoria's ambient air standards and most stack emissions limits for high emitting industrial facilities such as coal-fired power stations, do not reflect international best practice.

The International Agency for Research on Cancer classifies air pollution as a human carcinogen.⁷ A 2019 global review of evidence found that air pollution can damage every organ and every cell in the human body.⁸ In 2018, the director general of the World Health Organisation (WHO) declared air pollution a "public health emergency".⁹ Children and older people are most vulnerable to the health impacts of air pollution.

Useful Resources and Assistance

- EJA submission writing guide:

https://celsorgau.files.wordpress.com/2016/05/how_to_write_a_law_reform_submission.pdf

- Victorian Auditor-General Report Improving Victoria's Air Quality:

<https://www.audit.vic.gov.au/report/improving-victorias-air-quality?section=>

⁵ World Health Organization. Regional Office for Europe. (2006). Air quality guidelines global update 2005: particulate matter, ozone, nitrogen dioxide and sulfur dioxide. Copenhagen: WHO Regional Office for Europe. <https://apps.who.int/iris/handle/10665/107823>

⁶ See: <https://www.audit.vic.gov.au/report/improving-victorias-air-quality?section=>.

⁷ World Health Organization (WHO) 2013, *Media Release No. 221, IARC: Outdoor air pollution a leading environmental cause of cancer deaths*, International Agency for Research on Cancer, World Health Organization, Lyon, France: www.iarc.fr/wp-content/uploads/2018/07/pr221_E.pdf

⁸ Dean E. Schraufnagel, et al., Air Pollution and Noncommunicable Diseases: A Review by the Forum of International Respiratory Societies' Environmental Committee, Part 1: The Damaging Effects of Air Pollution, February 2019, Volume 155, Issue 2, Pages 409–416, Available at: <https://doi.org/10.1016/j.chest.2018.10.042>; Dean E. Schraufnagel, et al., (2019) Air Pollution and Noncommunicable Diseases: A Review by the Forum of International Respiratory Societies' Environmental Committee, Part 2: Air Pollution and Organ Systems, *CHEST Journal*, February 2019, Volume 155, Issue 2, Pages 417–426. Available at: <https://doi.org/10.1016/j.chest.2018.10.041>

⁹ Dr Tedros Adhanom Ghebreyesus, "Air pollution is the new tobacco. Time to tackle this epidemic" *The Guardian*, October 27 2018. Available at: <https://www.theguardian.com/commentisfree/2018/oct/27/air-pollution-is-the-new-tobacco-time-to-tackle-this-epidemic>

- Inner West Air Quality Community Reference Group policy position: https://www.environment.vic.gov.au/_data/assets/pdf_file/0029/486506/IWAQCRGReportFINAL.pdf
- EJA's People's Clean Air Action Plan for Victoria: <https://www.envirojustice.org.au/wp-content/uploads/2021/02/VICTORIA-Clean-Air-Action-Plan-2021.pdf>
- Health expert position statement on health-based ambient NO_x, SO₂ and O₃ standards: <https://www.envirojustice.org.au/wp-content/uploads/2019/11/Expert-Position-Statement-PDF.pdf>
- EJA submissions to the Victorian Clean Air Statement: <https://www.envirojustice.org.au/wp-content/uploads/2018/06/EJA-submission-VAQS-220618.pdf>
- NPI substances fact sheets: <http://www.npi.gov.au/substances/fact-sheets>
- EPA air pollution resources: <https://www.epa.vic.gov.au/for-community/environmental-information/air-quality/air-pollution>

If you have questions or would like tips on writing your submission, email Bronya Lipski at bronya.lipski@envirojustice.org.au