

SUBMISSION ON PROPOSED VARIATION TO AIR NEPM STANDARDS FOR SULFUR DIOXIDE, NITROGEN DIOXIDE AND OZONE

General Comment

CASANZ strongly supports a variation to the Air NEPM standards for these pollutants that is consistent with improving air quality and better health outcomes from exposure.

The limitations and uncertainties outlined in the Impact statement are noted as are the inconsistencies in health outcomes (and the explanation proposed) for ozone between modelled and measured concentrations for New South Wales (negative health outcomes with tighter standards). Also noted are the qualifications placed on the cost benefit analysis of the package of abatement measures modelled.

These qualifications raise the question of the value of the cost benefit analysis in decision making on the variation to the standards.

Comments on Specific Questions

Chapter 1 Introduction and Chapter 2 Air quality management in Australia

- Do you support the recommended changes to clause 14 (incorporating risk into how the number of performance monitoring stations is determined) and the inclusion of relevant definitions?
YES. Suggest that populations adjacent to high traffic density areas and truck transport routes be specifically included.
- Do you support the removal of allowable exceedances for CO?
YES
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Chapter 3 Statement of the problem

- Do you agree with the assessment of options in this report?
YES
- Have any options been missed?
NO
- Do you agree with the preferred option to vary the AAQ NEPM? In particular, do you agree that continued government involvement is required to address the current and potential future health impacts and costs of SO₂, NO₂ and O₃?
YES

Chapter 4 Methodology

- Have all key assumptions been correctly identified and included in the analysis? If not, please provide details.
- Can you suggest any improvements to the methodology used in this report for future reviews?

There appears to be a problem with the package of measures selected for inclusion in the CBA leading to the conclusion that the selected package needs adjustment. It is not clear whether the arises from the appropriateness of the MCA methodology or with the weighting factors used and weights assigned. For example, the use of quantum of emissions without consideration of emission release height does not reflect the relevant impacts. The selection of measures that are mainly based on controls on large point sources does not seem ideal for a regional scale problems with NO₂ and SO₂.

Chapter 5 Assessment of desired environmental outcome and goal

- Do you support the desired environmental outcome of the AAQ NEPM being revised to 'minimise the risk of adverse health impacts from exposure to air pollution for all people, wherever they may live'?
YES
- Do you support the goal of the AAQ NEPM being revised to make reference to the air quality standards and incorporation of exposure-reduction targets for priority pollutants?
YES

Chapter 6 Impact assessment for sulfur dioxide

- Do you agree with the recommendations made in this report for the SO₂ standards? Your answer should consider whether you agree:
 - a) with maintaining the status quo of not including a 10-minute SO₂ standard in the AAQ NEPM
YES
 - b) with retaining the averaging periods of 1-hour and 24-hours for SO₂ and removal of the annual SO₂ standard given the weak evidence of health effects from long-term exposures to SO₂
YES
 - c) that there are no other averaging periods for SO₂ that should be considered in the future
NO. This would imply certainty in the outcomes of future research.
 - d) with the preferred numerical value for the 1-hour SO₂ standard (100 ppb) and the future 1-hour standard (75 ppb) for implementation by 2025
YES
 - e) with the preferred numerical value for the 24-hour SO₂ standard (20 ppb) and no future 24-hour standard
YES
 - f) that there should be no allowable exceedances for the SO₂ standards
YES
 - g) that an exposure-reduction framework is not needed for SO₂.
YES

Chapter 7 Impact assessment for nitrogen dioxide

- Do you agree with the recommendations made in this report for the NO₂ standards? Your answer should consider whether you agree:
 - a) with retaining the averaging periods of 1-hour and annual for NO₂
YES
 - b) that there are no other averaging periods that should be considered for NO₂ in the future
NO. This would imply certainty in the outcomes of future research.
 - c) with the preferred numerical value for the 1-hour NO₂ standard (90 ppb) and the future 1-hour standard (80 ppb) for implementation by 2025
YES
 - d) with the preferred numerical value for the annual NO₂ standard (19 ppb) and the future annual standard (15 ppb) for implementation by 2025
YES
 - e) that there should be no allowable exceedances for NO₂ standards
YES

Chapter 8 Impact assessment for ozone

- Do you agree with the recommendations made in this report for the O3 standards? Your answer should consider whether you agree:
 - a) with the introduction of a rolling 8-hour O3 standard and removal of the 1-hour and 4-hour averaging periods
YES
 - b) with jurisdictions continuing to record and report 1-hour concentrations even if there is no 1-hour standard
YES
 - c) that there are no other averaging periods that should be considered for O3 in the future
YES
 - d) with the preferred numerical value for the 8-hour O3 standard (65 ppb)
YES
 - e) that there should be no allowable exceedances for the O3 standards
YES
 - f) with the introduction of an exposure-reduction framework for O3 (in the form of a long-term goal for O3 once O3 generation in capital cities is better understood)
YES
 - g) with jurisdictions commencing annual reporting on population exposure to O3 from the commencement of a varied AAQ NEPM
YES
 - h) with the introduction of an exceptional events rule for O3 that is consistent with the approach for the PM2.5 and PM10 standards in the AAQ NEPM. Note that an exceptional events rule will differ from an allowable exceedances rule as it will only apply to exceptional events (such as bushfires and dust storms) rather than be based on a fixed number of days.
YES