

# **Draft Tasmanian Air Quality Strategy**

## **Consultation Report**

May 2006

# Draft Tasmanian Air Quality Strategy Consultation Report November 2005

## 1. Introduction

This report was compiled from comment received during a public consultation program conducted in late 2005, and the project team and steering committee wish to thank all those who took the time to contribute to the draft strategy.

A few respondents were generally hostile to the thrust of the draft Strategy, while others provided strong overall support. All comments are summarised in the following tables. Between those extremes, we received a range of responses that has been extremely useful in clarifying or strengthening some aspects of the Strategy, and in some cases, prompted us to include additional program statements under existing objectives.

Where possible, ideas or criticisms presented by respondents have been incorporated into, or have informed development of the final strategy document. The summary presented below identifies issues raised during the consultation program and indicates resulting actions taken by the authors, ie whether the comments have been simply noted or agreed with, incorporated into the document, or where appropriate, arguments presented against some points raised.

General comments ranged from admonitions that the Strategy is too weak, “passive”, or that it needs more “teeth”, to concerns about whether a strong focus on domestic woodheaters in population centres is indeed correct, and whether woodsmoke does indeed have the health impacts that the explanatory document claims. Some respondents considered that industry and/or transport are far more significant contributors to degraded air quality in places like Launceston than domestic sources, and believe people have a “right” to burn wood for a variety of reasons, including some very real social, economic and equity issues, many of which are discussed within the draft document. Others were very concerned that the Government has an intention to ban woodheaters and that this would create enormous problems for the poorest sections of the community.

## 2. Summary of Comment

This section summarises comment received during the consultation period, which was in operation until 21 October 2005, and the responses of the Project Team and Steering Committee to each comment or group of comments, as appropriate. The format is comprised of three tables:

Table 1	<b>Summaries of general or overall comments from submissions</b>	Column 1 Column 2	Lists a summary of each comment against its corresponding submission number. Provides the response of the Project Team and Steering Committee, indicating that the comment has been noted, the text of the response and whether the comment has been incorporated or not, as appropriate.
Table 2	<b>Summaries of detailed comments on individual objectives</b>	Column 1 Column 2 Column 3	Lists the Strategy Objectives. Lists a summary of each comment against its corresponding submission number. Provides the response of the Project Team and Steering Committee, indicating that the comment has been noted, the text of the response and whether the comment has been incorporated or not, as appropriate.

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
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**Table 1: Overall or Broad Comments (listed against submission number)**

Commends DPIWE on the Strategy: comprehensive, informative, practical and achievable; agrees with content & scope; no changes needed. (1)	Noted.
Mainly supported but believes all cars greater than 2L in capacity should be converted to LPG, and woodheaters should not be used in urban areas under the current technology. (2)	Noted.
In agreement with & endorses the 15 objectives stated, and commends DPIWE on the Strategy. (3)	Noted.
No comments on draft strategy other than to emphasise that funding implications must be addressed through relevant budget development processes. (7)	Noted.
Believes the Strategy needs to focus on outcomes: cleaner environment and healthier people; should include more details on pollutants and their health effects; and requires more conclusions, a better summary and implementation section. (8)	Noted.
Generally supports the Strategy, however, it needs more teeth. (9)	Noted.
Supports the majority of the objectives, however, concerns were expressed about the equity and socio-economic implications of restricting woodheaters, and the Government's involvement in promoting alternative fuels. (11) (see below).	Noted.
Considers the major focus of the Strategy should be on domestic sources and industrial emissions rather than planned burning of vegetation. There were also concerns about likelihood of phasing in new PM <sub>2.5</sub> Standards. (12)	Noted.
Presented advertising material for commercial of the "Smart Burn" device. No other accompanying comments given. (15)	Noted.
Provided general comments on the significance of the gas roll-out, and offered assistance with reviewing the Strategy guidelines. (16)	Noted.
Very supportive comments on the Strategy: agrees with its scope and content, and recommends proceeding without changes. (19)	Noted.
Generally supportive of the Strategy, however, is critical of any restrictions on industrial development or any measures requiring additional costs for businesses (see comments under objective 12). (20)	Noted.
Supports most of the proposals of the Strategy but does have concerns over the State Government agencies attempting to compel local government to engage in new or additional enforcement roles (such as smoke patrols, wood heater monitoring or backyard burning bans) without providing more resources for the local Councils. (21)	Noted. The resourcing requirements for the implementation of the Strategy will need to be addressed.
Expressed concern on manpower issues for councils raised in relation to objectives 5, 6, 9 and 11. (23)	As above.
Generally opposed to the Strategy. Found the document difficult to digest and considers 8 deaths per year insignificant compared with other causes: "... we are doing pretty well...". Objects to a "nanny government", especially as many people find their wood heaters more satisfying than electricity and oil. States wood is a renewable resource and a move to electricity creates a monopoly, which is less competitive and will lead to higher costs for all, not just the underprivileged [ <i>sic</i> ], and will require supplementary generation from gas or coal, causing further global problems. (24)	Noted.
Agrees with the direction of the Strategy and welcomes support from the State Government to help improve air quality, such as policies, strategies and regulations (see below for details). (25)	Noted.

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
<p>Believes the over arching requirement of the Strategy should be on the cost of community health and wellbeing: "The scope fails to provide this emphasis, instead passively bowing to ensuring that the costs to industry are minimised on any requirement to clean up their act.... This whole Strategy needs to be far more effective rather than the passive approach adopted in this draft. It is quite apparent that with the current structure of the Steering Committee, composed of government appointees, such a draft Strategy has been produced so as not to be too radical and not be politically unpalatable in view of the forthcoming State election." (26)</p> <p>Supports the development of the air quality strategies and the focus on wood heaters, however, is conscious of possible gaps between strategies and their implementation. Also expressed the need to ensure that resources will be adequate to implement this Strategy, especially for the many "investigations" cited in the document. Believes that not enough is being done to address the wood smoke problem in Tasmania, and there should be more direct action to deal with it. (30)</p> <p>Generally supportive of the Strategy but wants better performance criteria for woodheaters (see comments below). (31)</p> <p>Generally supports the Strategy but wants a dedicated Minister for the Environment, rather than being "...tacked onto the end of someone or other's portfolio as if it's an afterthought, a bit of unwanted Cabinet flotsam.."; wants the first objective should have focussed on Ministerial accountability. Also, would like to see the control of indoor pollution and tobacco smoke included in the Strategy. (32)</p> <p>Endorses any strategy intended to improve environmental outcomes but is cautious of the potential for key responsibilities for its implementation becoming the role of local government: "The danger is not within the Strategy, but in the regulatory mechanisms to follow." Expressed concern that there is no indication in the Strategy of who will undertake the various functions, or how these functions will be resourced and financed; local government needs a clearer indication of what functions they will be required to undertake. (See below: Areas of interest identified against objectives identified in table 2, without further comment). (33)</p>		<p>Noted.</p> <p>The emphasis on health and wellbeing is covered under Section 2.1.3 Rationale for the Strategy. The Strategy endorses a holistic approach of dealing with airsheds and includes all sources of air pollution. Emissions from industries have been addressed in Section 2.4, and the airshed approach represents a tightening of controls in many cases.</p> <p>Noted.</p> <p>It is recognised that any strategy must find a balance between desirable objectives and resourcing. This is particularly reflected in the balance between investing money and resources in monitoring and investigation to obtain ever more precise or comprehensive data, as opposed to utilising those resources in implementing practical programs to solve or alleviate existing air quality problems. The draft Strategy attempts to find that middle ground.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>There is a range of proposals by the Government to implement the Strategy, which are of course, subject to the usual funding cycles and constraints. Resourcing must also be necessarily related to the final form of the Strategy itself, which will not be known until after the consultation program is complete and the Strategy approved by the Minister. The Strategy is based as far as possible on programs for which funding is or will be available. Where this is not so, and further investigations are required to understand the need for additional resourcing, this is clearly stated in the objectives.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
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**Table 2: Detailed Comments on Objectives (listed against submission number)**

<b>Information and Data Gaps</b>		
<b>Air Quality Monitoring and Forecasting</b>		
<u>Objective 1</u>	<b>Number of comments: 11</b>	
<p>Improve information available to evaluate air quality and monitor trends within the State by:</p> <p>Upgrading the existing monitoring system in accordance with the protocol of the National Environment Protection (Ambient Air Quality) Measure through:</p> <ul style="list-style-type: none"> <li>- upgrading of PM<sub>10</sub> monitoring equipment and capability;</li> <li>- establishing a new PM<sub>2.5</sub> monitoring system in Launceston and Hobart;</li> <li>- relocating and upgrading the monitoring station in Hobart in a more appropriate location;</li> <li>- establishing a new PM<sub>10</sub> monitoring station in Devonport; and</li> <li>- establishing a carbon monoxide monitoring station in the Hobart CBD;</li> </ul>	<p>Generally supported. (5)</p> <p>Inventory percentages (for Launceston) shown in the Strategy have been falsified for propaganda purposes; "The pollution is affected by cars in the majority, by industrial smoke at Invermay visible daily, pollution from Bell Bay and pollution from the mainland". (18)</p> <p>The Ti Tree bend site cannot give accurate readings, it is in the wrong place as it picks up pollution coming up the Tamar Valley and should be relocated to Forster Street. There are really only a "handful of days" when the respondent can smell the stuff (woodsmoke), while the smell of diesel is in the air all the time: ".that's the real killer." Respondent sees an orange haze over the city in summer and believes there is no solid evidence that woodheaters cause any deaths: "Tasmania does not come under the national guidelines as we are an island". (17)</p> <p>Monitoring does not cover local hotspots, eg Latrobe, Railton, parts of Hobart, Launceston and the Tamar Valley. Believes sidewalk eateries also need to be targeted, and much more needs to be spent on air monitoring, including PM<sub>2.5</sub>. (26)</p> <p>Supports improved air quality monitoring and the joint industry-State government- local government station at George Town. (30)</p>	<p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>The percentages have been calculated for PM<sub>10</sub> particles in Launceston during the winter months. They represent emissions from a range of fuel combustion processes, including woodheaters, industrial plants and motor vehicles. The estimates do in fact account for the contributions of industrial and motor vehicle emissions, and they have been updated in 2005 to include new information. They have been produced by departmental officers in good faith, with the best information currently available and have certainly not been falsified to provide some propaganda value.</p> <p>Noted. No action warranted.</p> <p>The establishment of the Ti Tree Bend site was preceded by a comprehensive study of particulate levels at five different sites around the Launceston region. The final choice was made on the basis that data from Ti Tree Bend were the best predictor of concentrations of particles at these other locations.</p> <p>The best evidence available indicates that the figures cited in the Draft Strategy are correct in showing woodsmoke as the major contributor to winter air quality problems in Launceston.</p> <p>There is overwhelming scientific evidence collected both in Australia and overseas that particles arising from poor combustion, including woodheaters, are strongly associated with various human health impacts, including respiratory and heart disease, ranging from exacerbation of existing illness to death.</p> <p>Tasmania is a signatory to the inter-governmental agreement on the environment 1992 and to a range of National Environment Protection Measures that have been developed through the National Environment Protection Council including the National Environment Protection (Ambient Air Quality) Measure and the National Environment Protection (Air Toxics) Measure. Once signed, these measures become policies under Tasmania's State Policies and Project Act, so Tasmania does indeed come under the national standards and goals established by these Measures.</p> <p>Noted. No action warranted.</p> <p>Hotspot monitoring is covered under Objective 1c. The focus of the draft Strategy is to strike a balance between investing in further monitoring and utilising scarce funding in solving the critical air quality issues facing Tasmania. Daily PM<sub>2.5</sub> monitoring is now being undertaken in Launceston and Hobart. Monitoring is due to commence in Devonport by the third quarter of 2006.</p> <p>Noted. No action warranted.</p>

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<p>Investigating the need for further air quality monitoring in population areas covered under Tasmania <i>Together</i> Benchmark 24.3.1;</p> <p>Investigating the need for a mobile monitoring capability for campaign monitoring and to respond to specific pollution events or complaints;</p> <p>Establishing a broad-based airborne particle monitoring programme in Greater Hobart;</p> <p>Facilitating the development of a joint industry-funded monitoring station at George Town;</p> <p>Identifying areas of potential high population exposure to air toxics and conducting monitoring programmes where necessary, in accordance with the National Environment Protection (Air Toxics) Measure;</p> <p>Reviewing and if possible, improving the accuracy of air quality forecasts in Launceston;</p> <p>Developing an Air Pollution Potential Atlas for the State identifying areas likely to have poor air dispersion to facilitate better air quality management;</p> <p>Improving the quality of dispersion modelling for Development Proposals and Environmental Management Plans; and</p> <p>Developing and implementing a smoke monitoring plan for planned burning in accordance with the <i>Environment Protection Policy (Air Quality) 2004</i>.</p>	<p>Could be interpreted as either exposure of large numbers of people or local exposure to high levels. (10)</p> <p>The forecasting system should not only be expanded state-wide but the frequency should be increased on high risk days. (3)</p> <p>Considers current Launceston “good, moderate &amp; poor” air quality forecasting is a start but needs to include what is expected of various organisations to reduce the “poor” figure. There is no warning to public when a “poor” day is forecast, and claims that apparent improvement of air quality is the result of windy winter periods, not a real reduction in levels. (26)</p> <p>Supported, but questioned the value of pre-calculated meteorological input data for Ausplume for all of Tasmania – would be better to focus on a small number of potential industrial development areas. (30)</p> <p>Recommends that the results of atmosphere modelling should be tested against reality regularly. Tasmania has many areas of microclimates. (9)</p> <p>Identified as an interest for local government. (33)</p>	<p>Noted. No action warranted.</p> <p>This is correct. However, the Air NEPM generally applies to regional exposure. The definition of “region” is subject to some interpretation, recognising that pollution levels and population densities may well vary across a region and both have an effect on community exposures. For example, numbers of woodheaters or local topography may both influence particle levels in a local residential area, exposing residents to possible higher risk than others within an airshed. Alternatively, in an airshed with more uniform concentrations, a large population may be exposed to lower levels across the whole airshed.</p> <p>Noted. No action warranted.</p> <p>This will form part of the review process of the forecasting system.</p> <p>Noted. No action warranted.</p> <p>This will form part of the review process of the forecasting system.</p> <p>Noted. No action warranted.</p> <p>A large number of files will be developed covering a wide range of regions and local areas, where air quality issues are likely to arise.</p> <p>Noted. No action warranted.</p> <p>In those areas where major studies are taking place, modelling exercises are backed up by monitoring programs.</p> <p>Noted. No action required.</p> <p>Resourcing issues will be considered as part of the development of the Implementation Plan for the Strategy.</p>
<b>Sources of Particulate Matter and Trends in Domestic Heating</b>		
<b>Objective 2</b>	<b>Number of comments: 6</b>	
<p>Gather data on the main sources of air pollutants and the trends in the type of home heating used around Tasmania by:</p> <p>Estimating emissions of PM<sub>10</sub> and PM<sub>2.5</sub> from domestic and small industrial sources for the entire State;</p>	<p>Supported. (5)</p> <p>States there are many reasons for using woodheaters i.e cooking, health or staying warm, and Tasmania is not blessed with the climate that mainland Australia has: warmer with shorter winters. (17)</p> <p>Supported. (29)</p> <p>Better to measure emission concentrations if information on emissions difficult to obtain. (9)</p>	<p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>The Strategy acknowledges that there are many reasons for using woodheaters and we reiterate that the government has no intention of banning woodheaters outright.</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
<p>Conducting annual market research in Launceston to monitor trends towards less polluting alternatives and barriers to conversion to alternative forms of domestic heating; and</p> <p>Monitoring the uptake of unflued gas heaters across the State.</p>	<p>Identified as an interest for local government. (33)</p> <p>Questions the implied toleration of unflued gas heaters - considers that the State has a one-off opportunity to ban installation of unflued gas heaters and should act now. Respondent notes that there is already sufficient evidence to establish health impacts of these heaters and cites the recent DEH study – much stronger action required. (30)</p>	<p>Inventory estimates are derived in two main ways: by direct measurement of in-stack concentrations where possible; and by standardised estimation techniques otherwise. Direct measurement is always preferable, but of course for various reasons, this is not always practical. In addition, it does not address fugitive emissions, which must invariably be estimated by emission factors or mass balance calculations, or a combination of both.</p> <p>Noted. No action required.</p> <p>Noted. Action:</p> <p>The issue of unflued gas heaters is of great concern, from the point of view of replacing one air quality problem with another that may be even more serious for some sectors of the community. Amended Objective 2 c) to read: “Promote the uptake of externally-flued gas heaters in preference to unflued gas heaters”.</p>
<p><b>Please Note: this section has been removed from the Strategy and combined with Objective 6.</b></p> <p><b>Second-Hand Woodheaters</b></p>		
<p><b>Objective 3</b></p>	<p><i>Number of comments: 3</i></p>	
<p>Understand the contribution of second-hand woodheaters to the total emissions from woodheaters by:</p> <p>Conducting research into the number and distribution of second-hand woodheaters installed and estimating the contribution of emissions from second-hand woodheaters to poor air quality.</p>	<p>Supported. (4)</p> <p>Cannot see why second-hand heaters are considered separately from others. Considers second-hand heaters simply a subdivision of “older heaters” – should focus on whether the kind and condition of a heater allows it to meet AQ requirements. (9)</p> <p>Identified as an interest for local government. (33)</p>	<p>Noted. No action required.</p> <p>Noted. Action:</p> <p>The Committee agrees that secondhand heaters are a largely unknown quantity in terms of their ages and conditions. Further, they may be re-sold or re-installed privately without any real controls. The draft Regulations do not differentiate them, so this objective has been combined with Objective 6: New and Secondhand Woodheaters into a new objective (5): Managing Installations of Additional Woodheaters.</p> <p>Noted. No action required.</p>
<p><b>Public Accessibility to Air Quality Information</b></p>		
<p><b>Objective 4</b></p>	<p><i>Number of comments: 4</i></p>	
<p>Provide better access to air quality monitoring data by:</p>	<p>Supported. (5)</p> <p>Would like the highest levels within 24 hour period to be recorded. Respondent considers current 24 hour standard inadequate for public health warnings, and would like a direct link to radio and television stations, with broadcasts to include warnings not to “light up”, etc. (26)</p>	<p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>The 24 Hour standard is required under the current Air NEPM. However, note that the Air NEPM is under review over the next few years and the whole issue of National Environment Protection Standards, including levels, averaging periods and performance goals, will be considered in the light of current health research information. There will be opportunities during that process to offer ideas and comments on the form of the NEPM, including National Environment Protection Standards. Continuous data is produced by the Department’s TEOM instruments, but is not at present linked in real time to the web site. The data that is currently published is validated by scientific staff as part of quality assurance programs to ensure that it is not corrupted by local interferences, for example, by dust raised by trucks passing the station. It is this validated data that is published by the Department, because it represents general air quality in the airshed.</p>

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<p>Reducing the lag time in obtaining results from air monitoring programmes;</p> <p>Regularly updating air quality monitoring information <i>via</i> the DPIWE web site; and</p> <p>Investigating the feasibility of providing real-time data on the web site.</p>	<p>Supports better access to air monitoring data and notes that the present web site only shows PM<sub>10</sub> data up to June 2004 for Launceston. (30)</p> <p>Believes there is an issue here of how the information is managed in the context of the credibility of the strategy, as potential 'shock horror' media reports are predictable. (8)</p>	<p>Noted. Action:</p> <p>An upgrade of the web site is planned in the next year or so as part of the air monitoring upgrade program.</p> <p>Noted. No action warranted.</p> <p>Balancing the public right to know, with the potential for misuse of the data by media and interest groups, is always an issue for authorities. The Strategy seeks to enhance public awareness and understanding of air quality issues through educational programmes and the provision of comprehensive contextual information when air quality is published.</p>
<p><b>Residential Sector</b></p> <p><b>Existing Woodheaters</b></p>		
<p><b>Objective 5</b></p>	<p><b>Number of comments: 14</b></p>	
<p>Facilitate reductions in the existing number and impact of woodheaters in areas with compromised air quality by:</p> <p>Researching and implementing mechanisms for removing barriers to changing heating sources;</p> <p>Monitoring trends in the reduction of the number of woodheaters across the State;</p> <p>Investigating the appropriateness of a redeveloped woodheater buy-back scheme;</p>	<p>Cites an incident in September 2005 when smoke emissions from planned burning were noticeable in Derwent Valley but it was a day when only a few woodheaters were in use. (14)</p> <p>Criticised the failure to mention potential increase in nitrogen oxides emissions as result of conversion of domestic and industrial heating to gas, and claims this may lead to the formation of "toxic ozone smogs". (26)</p> <p>Would like a ban on wood fuelled heaters. (13)</p> <p>Identified as an interest for local government. (33)</p> <p>Supported but would like to see new woodheaters included as an alternative to older heaters rather than just non-woodheater options. Believes the rights of consumers to choose their heating method should not be removed. (4)</p>	<p>Noted. No action warranted.</p> <p>Noted. No action recommended.</p> <p>The authors are aware of the possibility of increased emissions of nitrogen oxides associated with the combustion of gas. However, the issue is not as simple as this because many combustion processes using other fuels also produce significant quantities of nitrogen oxides. Experience on the mainland suggests that the wide spread use of gas heating is not associated with significant nitrogen oxides concentrations as a proportion of total sources (see the NPI web site: <a href="http://www.NPI.gov.au">www.NPI.gov.au</a>).</p> <p>Current understanding of Tasmanian airsheds suggests that neither the meteorology nor the source strengths of precursor emissions (nitrogen oxides and volatile organic compounds) are conducive to forming photochemical smog.</p> <p>Noted. No action warranted.</p> <p>The authors reiterate that the Government has no intention of banning woodheaters. However, several councils in the Tamar Valley are considering applying restrictions on the installation of new woodheaters in sensitive areas of the Valley (see the Tamar Valley Air Quality Strategy: draft for consultation, 2004).</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>As there is no intention by the Government to ban woodheaters, there can be no claim that consumers' right to choose is being compromised. If any buy-back scheme was proposed it would be voluntary.</p>

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<p>Promoting the use of alternative forms of heating; and</p> <p>Developing <i>Air Quality Regulations</i> to reduce emissions from domestic woodheaters.</p>	<p>Supported, however, funding for the woodheater buy-back scheme needs to be increased up to \$10M. (5)</p> <p>Wants \$200 “cash-back” for receipt of proof that a metal recycler has crushed old heaters. (14)</p> <p>Claims that discarded heaters are being recovered in Launceston and being re-sold through salvage shops. However, reports about these activities to authorities “fall on deaf ears”. Believes the buy-back scheme was good but claims some inequities in the criteria for the scheme. (34)</p> <p>Supported, however, incentives must be available in the long term to cater for the existing heaters. The average life of a heater can be as much as a decade. (9)</p> <p>“I am in the silent majority who may suffer from asthma who cannot breathe with electric or gas heating as the air inside makes me sick”. (17)</p> <p>Would like to see that this would apply to existing woodheaters as well as new installations. (10)</p> <p>Wants tougher penalties on both resellers of non-compliant heaters and owners who allow them to smoke. (14) [see also comments under objective 6]</p> <p>Sees a “blanket regulation” as inappropriate – this should read “developing Air Quality Regulations to reduce emissions from domestic woodheaters in sensitive areas with a woodheater issue”. Regulations should be a last resort and better guidelines for wood and the use of heaters must be adopted first. (9)</p> <p>Believes the laws should be across the board for everyone, not just residences, ie big businesses as well. (34)</p>	<p>Noted. No action recommended.</p> <p>Noted. Action:</p> <p>The authors will recommend the consideration of this idea as part of the investigations into possible future measures. If this incentive is implemented, the authors recommend that it only apply to woodsmoke affected areas.</p> <p>Noted. No action recommended.</p> <p>Accusations have been raised previously and were referred to the Launceston City Council and the Commonwealth Department of Environment and Heritage. The accusations were taken seriously as such actions would probably have criminal law repercussions, in that this may represent fraud against the Commonwealth Government. No concrete evidence for this activity was forthcoming at the time.</p> <p>Such accusations should be backed up by clear evidence so that appropriate legal action can be taken.</p> <p>Noted. No action recommended.</p> <p>The authors foresee this is something that would be considered in the context of the formation of any possible buy-back scheme in the future.</p> <p>Noted. No action warranted.</p> <p>The authors reiterate that the Government has no intention of banning woodheaters.</p> <p>Noted. No action warranted.</p> <p>The regulations will apply to all woodheaters.</p> <p>Noted. No action warranted (see comment for objective 6).</p> <p>Noted. No action recommended.</p> <p>The intent of the recommended wording for programme statement 5 (e) is covered in the lead statement of Objective 5.</p> <p>The Strategy has a strong focus on those areas (airsheds) where problems occur or are probable. However, care needs to be taken to ensure that in taking a broad airshed approach, the issue of neighbourhood nuisance is not overlooked. In reality, the scenario described mirrors the approach in the Strategy. That is, education and incentives are used first, and direct regulation is invoked only in those few intractable cases where problems persist through wilful actions by the operators.</p> <p>Noted. No action warranted.</p> <p>Industrial point sources already come under considerable regulatory control through permits issued under the <i>Environment Management and Pollution Control Act 1994</i> (EMPCA). The <i>Environment Protection Policy (Air Quality) 1994</i>, made under EMPCA, also came into force on 1 June 2005. The Policy contains detailed requirements for point sources, including limits on emissions and ground-level concentrations, and further requires that activities should not compromise the ability to meet National Standards within an airshed. This is exactly the rationale for which controls on domestic smoke emissions are being introduced.</p>

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<p><b>PLEASE NOTE: This section of the strategy has been amended to include some of the information from the now deleted Objective 3: Second-hand Woodheaters.</b>  <del><b>New and Second-hand Woodheaters</b></del> <b>Managing Installations of Additional Woodheaters</b></p>		
<u>Objective 6</u>	Number of comments: 12	
<p>Consider options for reducing the number of additional woodheaters installed in sensitive areas by:</p> <p>Investigating the efficacy and practicality of placing restrictions on installation of wood-fuelled heating in new and renovated homes;</p> <p>Developing <i>Air Quality Regulations</i> to require that new and second-hand woodheaters comply with the current Australian Standard; and</p>	<p>Strongly objects to the installation restrictions on woodheaters in new or renovated homes. (4)</p> <p>Wants woodheating banned in Launceston and Kingston. (13)</p> <p>Woodheaters should not be banned outright, as they are an economical form of heating; perhaps a quota in sensitive areas would be best, along with means testing. (9)</p> <p>Decisions on the installation of woodheaters can primarily be a cost issue, so other mechanisms to restrict them will have unfavourable equity and socio-economic implications. Therefore, there may be a need to offer subsidies or rebates to compensate for the removal of cost-effective heating sources. The restrictions could also create a perverse incentive to install secondhand heaters by unqualified installers as well. A better solution would be to extend smoke patrols and focus on equity and socio-economic implications in any investigation. (11)</p> <p>Regards total ban on woodheaters as a ridiculous idea as it will have an indiscriminate effect on the livelihood of retailers. (14)</p> <p>People's heating methods shouldn't be taken away from them, and considers that heat pumps are unsuitable for modern open-plan home of today. States woodheating is cheaper and Hydro power is limited. (18)</p> <p>Not in favour of forcing secondhand woodheaters to meet new regulations except where the modification is "very, very cheap". The installation should not be limited to specially trained persons but have guidelines from council for installations by suitable others and owners. (9)</p>	<p>Noted. See comment below.</p> <p>Noted. No action warranted.</p> <p>The authors reiterate that the State Government has no intention of banning woodheaters. However, there are several councils in the Tamar Valley who are considering applying restrictions on the installation of new woodheaters in sensitive areas of the Valley (see the Tamar Valley Air Quality Strategy: draft for consultation, 2004).</p> <p>Noted. No action warranted.</p> <p>The authors reiterate that the Government has no intention of banning woodheaters.</p> <p>The Strategy does not advocate a ban on woodheaters, nor has the State Government made statements to that effect, recognising a range of equity and socio-economic impacts on the community. Rather, the Strategy seeks to promote the adoption of alternative types of energy through education and other incentives.</p> <p>However, the proposed Regulations do prohibit the sale and installation of heaters which do not meet the version of the Australian Standard current at the time of sale or installation.</p> <p>Noted. No action warranted.</p> <p>Socio-economic equity issues are addressed in Objective 10 and are discussed in the Explanatory Document.</p> <p>Noted. No action warranted.</p> <p>The authors reiterate that the Government has no intention of banning woodheaters.</p> <p>Noted. No action warranted.</p> <p>Noted. No action warranted.</p> <p>The Regulations would apply to installation, sale, etc., of woodheaters, so unless an existing woodheater is sold or re-installed, the relevant regulations would not be invoked. Existing woodheaters would not be required to meet the standard. However, if in operation, they are shown to be smoky, then they may trigger the relevant smoke emission regulation. Any modifications made to heaters must not increase emissions beyond those required by the Australian Standard. Experience in the industry is that a critical area is the design of the air inlet holes. In general these are not amenable to easy modification to bring about improvements, and in some newer units, cannot be accessed. Most modifications in the past have been aimed at reducing airflow to allow overnight close-down, but by its very nature, this reduces burning efficiency and increases air emissions.</p> <p>The authors remain of the view that installation should be undertaken by properly trained persons, so that appropriate standards are met and some quality control can be exerted by regulatory authorities.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
	<p>Would like tougher penalties on both resellers of non-compliant heaters and owners who allow them to smoke. (14)</p> <p>Considers that more direct action is required to address compliance with the woodheater emission standard. The proposed Air Quality Regulations are seen as not providing sufficient penalties for excessive woodsmoke. (30)</p>	<p>Noted. No action recommended.</p> <p>These issues are likely to be addressed through the proposed Air Quality Regulations: <i>Environmental Management and Pollution Control (Air Quality) Regulations 2006</i>.</p> <p>Noted. No action recommended.</p>
<p>Evaluating the contribution of second-hand woodheaters to air quality problems, and developing appropriate management strategies.</p>	<p>When woodheaters are removed from Housing Tasmania properties, the woodheaters become the property of the contractor, who is required to destroy woodheaters that do not comply with the current standard – considers that this lends support to the development of air quality regulations. (31)</p> <p>Identified as an interest for local government. (33)</p> <p>Wants total ban on sale of second-hand woodheaters. (4)</p>	<p>Noted. No action warranted.</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>The draft proposed Regulations are unlikely to ban the sale of secondhand woodheaters but any heater sold will have to meet the requirements of the Australian Standard.</p>
<p><b>Woodheater Technology, Design and Installation</b></p>		
<p><b>Objective 7</b></p>	<p style="text-align: center;"><b>Number of comments: 6</b></p>	
<p>Promote improvements in technology, design and installation of new woodheaters by:</p> <p>Improving woodheater installation practices;</p> <p>Developing <i>Air Quality Regulations</i> to require that new woodheaters meet the emission limits in AS/NZS 4013;</p> <p>Promoting improvements in AS/NZS 4013 for woodheater emissions;</p> <p>Promoting cleaner technology woodheaters and fuels derived from wood waste;</p> <p>Actively supporting implementation of the <i>National Woodheater Action Plan</i> and promoting the adoption of improved woodheater technology; and</p> <p>Conducting an assessment programme of the compliance of new woodheaters with Australian Standards.</p>	<p>Supported. Can supply training package for woodheater installers. (4)</p> <p>Supported. (29)</p> <p>Concerned over the additional regulatory functions/responsibilities that may be imposed on local government to effectively administer such regulations, ie inspections of installations. Careful thought is needed. (8)</p> <p>Current technology woodheaters should not be used in urban areas. (2)</p> <p>Supported but particulate emission standard needs to be decreased (tightened) from 4g/kg to 0.9g/kg in Launceston. (5)</p> <p>Housing Tasmania specifies a maximum emission factor of 0.9 grams per kilogram, which is more stringent than that required under the current Australian Standards (4g/Kg). (31)</p>	<p>Both noted.</p> <p>Noted. No action warranted.</p> <p>Noted. No action warranted.</p> <p>The authors reiterate that the Government has no intention of banning woodheaters. However, several councils in the Tamar Valley are considering applying restrictions on the installation of new woodheaters in sensitive areas of the Valley (see Tamar Valley Air Quality Strategy 2004).</p> <p>Noted. No action warranted.</p> <p>The Australian Standard (AS 4013) for the performance of woodheaters is currently under review at the time of writing.</p> <p>Noted and commended. No action required.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
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## Woodheater Fuel Quality

<u>Objective 8</u>	Number of comments: 5	
<p>Increase the quality of wood fuel by:</p> <p>Supporting the establishment and implementation of an effective certification programme for firewood suppliers in Tasmania and monitoring its effectiveness.</p>	<p>Supported, however, needs to be more stringent. (5)</p> <p>Considers that the first thing that should be cleaned up is the sale of wood from backyard wood merchants, who do not care what sort of wood they sell. Believes all firewood should be covered to prevent it from becoming wet. (18)</p> <p>Supported. (28)</p> <p>Identified as an interest for local government. (33)</p> <p>Suggests that informing the public of what the moisture content of cut wood is after 3 months, 6 months, and 9 months etc., or restricting the sale of green wood within a certain time period with on the spot sampling etc., would be helpful and could form the basis of a practical approach to regulation and improvement. (8)</p>	<p>Noted. No action warranted.</p> <p>Noted. No action recommended.</p> <p>Noted. No action required.</p> <p>Noted. No action required.</p> <p>Noted. Action:</p> <p>The authors have incorporated this suggestion into the explanatory document.</p>

## Community Education

<u>Objective 9</u>	Number of comments: 9	
<p>Increase general community awareness of the health impacts of domestic burning, how to operate woodheaters efficiently and alternative forms of heating by:</p> <p>Developing guidelines for woodheater operation and storage of wood (using existing educational materials);</p> <p>Developing a holistic communications strategy including schools, Local Government, local communities and the broader public which includes an evaluation system;</p> <p>Establishing an air quality educational programme for schools;</p> <p>Supporting existing smoke patrol programmes and promoting their adoption in other areas of the State with compromised air quality;</p> <p>Adopting and promoting the use of home energy audit packages to assist householders to use energy efficiently whilst minimising their contribution to air pollution;</p>	<p>Supported. (5)</p> <p>Wants new clause added: "Increasing community awareness of the need for planned burning of vegetation and of the processes taken to minimise smoke and physical impacts." (12)</p> <p>Would like the education programs to focus on "ecological burns" and the role that planned burns play in ecological balance and reduction of wildfire hazards. (22) [see also comments under objective 14]</p> <p>Fully supported but suggest that it apply to local areas of compromised air quality. (10)</p> <p>Believes that education programs and smoke patrols should be introduced and policed. (14)</p> <p>Identified as an interest for local government. (33)</p> <p>Supported, however, believes the promotion of passive solar heating and insulation should be included as well. (5)</p> <p>Supports the idea of a home energy audit packages. (8)</p>	<p>Noted. No action required.</p> <p>Noted. No action recommended (refer to Planned Burning Objective 14).</p> <p>Noted. As above.</p> <p>Noted. No action warranted.</p> <p>Current smoke patrols are focussed in local residential areas.</p> <p>Noted. No action warranted.</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
<p>Evaluating the effectiveness of air quality forecasting in Launceston on behavioural change in the community, and improving, where appropriate; and</p> <p>Expanding air quality forecasts to other areas of the State.</p>	<p>Believes the forecasting system should not only be expanded state-wide but the frequency should be increased on high risk days. Would like planned burning factored into air pollution forecasts as well. (3) [see objective 14]</p>	<p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>As part of the Strategy investigations will be taken towards the adoption of the Australian Air Quality Forecasting System which is believed to be able to perform more frequent forecasts, however, the current Tasmanian forecast system is not able to do this.</p> <p>Air pollution forecasts are used to inform planned forestry burning. Objective 14 of the Strategy addresses improved co-ordination of planned burning. Public dissemination of information about air pollution and planned burning will be included into the text under the Planned Burning section.</p>
<h3>Equity in Home Heating</h3>		
<p><b>Objective 10</b></p>	<p><b>Number of comments: 6</b></p>	
<p>Promote equity in the community relating to home heating by:</p> <p>Investigating an appropriate strategy for the replacement of woodheaters within houses owned by Housing Tasmania that are located in areas with poor air quality; and</p> <p>Investigating the feasibility of subsidising fuel costs for alternative heating methods and costs for retro-fitting insulation for low-income households.</p>	<p>Supported but needs progression. (5)</p> <p>States that there are many Tasmanians who can scarcely afford to pay the higher energy bills to heat their homes from alternative sources, therefore, woodheating is seen as a viable option for specific socio-economic groups. (4)</p> <p>Wants all existing woodheaters in Housing Tasmania houses replaced immediately and all refurbished houses to have alternative heaters, particularly in areas with poor air quality. (26)</p> <p>Housing Tasmania has recently revised its home heating policy, which limits opportunities for installation of woodheaters in houses in the Tamar Valley airshed, Bridgewater and Gagebrook areas, and defines minimum ceiling insulation in some houses. (31)</p> <p>Concerned that natural gas is being made available to “upper class” areas, but not to “lower class” neighbourhoods such as theirs. This gives the poorer people little choice than to accept Hydro power, which is so expensive that “our only alternative is wood”. “We pay more for power than big business (so) where’s the justice in that.”. Believes the government needs to get out and talk to the public: “Get the whole picture before making decisions, stop the rich and poor gap from getting any bigger.” (34)</p> <p>Suggests that the views of the Brighton Council be sought on this in particular the ideas coming from the Brighton-Hobart project for implementation in that municipality. (8)</p>	<p>Noted. No action warranted.</p> <p>Noted. No action required.</p> <p>Noted. See comment below from Housing Tasmania.</p> <p>Noted and commended.</p> <p>Noted. No action recommended.</p> <p>The issue of social equity is strongly identified in the Strategy, including a recognition of the difficulties in solving some very intractable problems faced by poorer sectors of the community. The strategy aims to find a balance between addressing the broad public health issues resulting from poor air quality and resolving the problem of adequate heating for Tasmanians. In part, this is being addressed through Housing Tasmania energy policies, focussing on both the heating and energy efficiency aspects of their properties. The government has also made it clear that there is no program to ban woodheaters, but rather to assist people to make choices about the forms of heating in their homes. On the other hand, both the State and local governments are encouraging people who do own woodheaters to operate them in the best way possible to maximise efficiency and reduce emissions to the air.</p> <p>Noted. No action warranted.</p> <p>All councils will be consulted on this issue during the implementation stage of the Strategy.</p>
<h3>Emissions From Backyard Burning</h3>		

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
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<b>Objective 11</b>	<b>Number of comments: 9</b>	
<p>Reduce emissions from backyard burning by: Developing <i>Air Quality Regulations</i> to prohibit backyard burning on properties less than 2,000 square metres;</p> <p>Developing awareness programmes on the new restrictions relating to backyard burning; Enforcing bans on backyard burning; and</p> <p>Developing alternative green waste management programmes.</p>	<p>Supports this objective but minimum land area should be increased to 5000m<sup>2</sup>. (5)</p> <p>Would like to see backyard and industrial/commercial (open) burning banned. (13)</p> <p>Believes backyard burning should be banned. (17)</p> <p>Fully supported. The development of these regulations and their enforcement is a high priority. (26)</p> <p>Considers the 2000m<sup>2</sup> threshold is not sufficient enough as many suburban blocks are larger than this. Further measures are needed to improve the recovery and recycling of waste materials, and green waste home composting and collection to minimise the use of backyard burning to dispose of waste on any size block. (30)</p> <p>Wants a permit system controlled by local government with input by Tasmanian Fire Service and Dept of Meteorology – permits only issued if not a specified fire danger period and the predicted air quality is “good”. (26)</p> <p>Wants a ban on wood fuelled heaters and backyard incinerators. (7)</p> <p>Identified as an interest for local government. (33)</p> <p>Supported but would like to see composting of forestry and farm waste and better facilities for council collection of green waste. (7)</p>	<p>Noted. No action recommended.</p> <p>The limitations of this area are recognised, however, it is seen to be a practical upper limit for the proposed Air Quality Regulations. The majority of urban residences and some smaller businesses would be smaller than 2000m<sup>2</sup>. It is intended that the Regulations do not preclude the implementation of tighter requirements by councils if judged to be appropriate. Councils could also opt to introduce a By-law which reduces the area size, thereby, excluding more of residences affected by the regulations.</p> <p>Noted. No action recommended.</p> <p>It is likely most urban residences and the smaller businesses would come under the proposed Air Quality Regulations.</p> <p>Noted. As above.</p> <p>Noted. No action required.</p> <p>Noted. As above.</p> <p>Noted. No action warranted.</p> <p>This is not suitable to the burning that falls under the future proposed <i>Air Quality Regulations</i>.</p> <p>Noted. No action warranted.</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p>

## Industrial Sector

### Effective Regulation of Industrial Emissions

<b>Objective 12</b>	<b>Number of comments: 6</b>	
<p>Ensure effective regulatory control of industrial emissions by: Integrating airshed capacity as part of the assessment of development applications for proposed new industrial activities and major upgrades of existing activities;</p>	<p>Supported, however, EMPCA needs to be tightened. (5)</p> <p>Believes the airshed approach will have significant implications for investment in Tasmania and the State’s investment attraction plans. Respondent is critical of: a blanket ban on new particulate sources in the Tamar Valley and the tighter performance standards, beyond those specified in the Air Policy, where air quality problems exist; or requirements for alternative energy sources, such as gas or electricity. (20)</p>	<p>Note. No action warranted.</p> <p>Noted. No action warranted.</p> <p>The airshed approach is enshrined in clause 11(1)(b) of the Environment Protection Policy (Air Quality) 2004, which states: “To retain a reserve capacity for airsheds, no activity at a point sources of air pollution should be permitted to emit a pollutant in a manner and quantity that, allowing for other reasonable emissions to the relevant airshed, would prejudice compliance with the air NEPM.”</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
<p>Training Local Government and industry on the use of the Tasmanian Air Pollution Potential Atlas and to evaluate proposals for new or upgraded point sources;</p> <p>Regulating industry emissions consistently; and</p> <p>Taking appropriate enforcement action against industries that consistently fail to meet regulatory requirements in regard to emissions to air.</p>	<p>Identified as an interest for local government. (33)</p> <p>Recommends new industries (in airshed?) undertake thorough airshed studies over a full 2 year period and the results included in any development application. There should be a plan to have industries moved should they be found to be located in an inappropriate area in which they are presently sited. (26)</p> <p>Considers the airshed capacity approach requires extensive monitoring, especially in complex terrain such as that found in many areas of Tasmania and believes it is not clear that the Air Quality Section of the Department has the capacity to carry out such monitoring unless more resources are provided. (30)</p> <p>Concerned that the expectations of local government in this are not explained. (8)</p>	<p>So in reality, the performance standards to which the submission refers are not beyond the Policy, but are in fact part of it. The draft Strategy merely reflects this approach. It recognises that it is unreasonable in terms of health impacts on communities, to further exacerbate air quality problems in an airshed in which levels of one or more criteria pollutants are breaching, or likely to breach the National Standards. These were developed on the best knowledge and the advice from eminent experts in the field within Australia. The other side of the argument surely must consider potential costs to the health system from respiratory and heart disease, which clearly is exacerbated by poor air quality, as shown by the most current epidemiological information from Australia and around the world.</p> <p>Of course, the problem of poor air quality can, and should be addressed from all points of view, where the most cost effective management programs should be utilised to manage emissions, whether they be from industry, domestic sources or transport. The Strategy endeavours to address the balance of these approaches for those airsheds for which good information is available. It also seeks to improve information where this is not currently available. The authors of the Strategy document have been careful to ensure that it addresses the obvious problems that exist in some areas of the State within the context of sustainable development.</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>The nature and extent of approval studies is dependent on the scope of the project.</p> <p>Noted. No action warranted.</p> <p>The required monitoring programs can be augmented with air pollution dispersion modelling. Monitoring and modelling data from studies relating to new industrial proposals is progressively incorporated into the Department's knowledge base.</p> <p>Noted. Action:</p> <p>The authors have amended text to include more information on the role of the Air Pollution Potential Atlas.</p>
<b>Cleaner Production Programmes</b>		
<b>Objective 13</b>	<b>Number of comments: 2</b>	
<p>Facilitate improved environmental performance of industrial emission sources by:</p> <p>Promoting cleaner production programmes to assist industry minimise emissions and energy use; and</p> <p>Establishing economic incentives to encourage industry to convert to cleaner fuels.</p>	<p>Supported. (5)</p> <p>Identified as an interest for local government. (33)</p>	<p>Noted. No action required.</p> <p>Noted. No action required.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
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## Planned Burning

### Smoke Management From Planned Burns

<u>Objective 14</u>	Number of comments: 11	
<p>Improve the management of smoke from planned burning by:</p> <p>Establishing smoke management procedures for planned burning;</p> <p>Incorporating smoke management procedures into the Forest Practices Code;</p> <p>Improving the co-ordination of planned burning to minimise smoke impacts; and</p> <p>Investigating the most appropriate way to manage and respond to complaints relating to planned burning.</p>	<p>Supported, however, better public awareness campaigns are needed (TV, radio, etc.). (5)</p> <p>Accelerants used in planned burns are often more objectionable than the smoke from them, which rises to a considerable height before dispersing; particularly so for vegetation burns near residential areas. (10)</p> <p>Wants community education program on benefits of planned burning. (12) [see comments from this respondent under Objective 9]</p> <p>Cites an incident in September 2005, when smoke emissions from planned burning were noticeable in Derwent Valley but was when there were few woodheaters in use. (14)</p> <p>Would like education programs to focus on “ecological burns” and the role that planned burns play in ecological balance and reduction of wildfire hazards. (22)</p> <p>Would like to see 'Vegetation Management burns' included in the types of planned burns. (8)</p> <p>Planned burning should be factored into air pollution forecasts. (3) [see also Objective 9]</p> <p>All planned burns must subject to a permit system issued by TFS with input from the adjacent local government region and the Dept of Meteorology. (26)</p> <p>Believes the area to be burnt and fuel estimate are better types of information to be used to decide which/when planned burns should go ahead. Also suggests on ground wind direction instruments may be better for judging low intensity burns instead, as smoke plume is close to ground, therefore, related to topography as well. (8)</p> <p>Identified as an interest for local government. (33)</p> <p>Hobart City Council has a 'proven robust' complaints system, which they are willing to provide as a model. The HCC is aligned with many of these points and can be used as a resource if need be. (8)</p>	<p>Noted. No action warranted.</p> <p>Noted. No action warranted.</p> <p>Presumably this applies to fuel reduction burning, which produces smoke relatively close to the ground. The quantity of smoke from the accelerants would most likely be much less than the smoke generated by the burning of forest residue.</p> <p>Noted.</p> <p>Noted. No action warranted.</p> <p>Noted. No action recommended.</p> <p>The education section of the Strategy is directed/focused on the community's awareness of their own responsibilities and the authors do not believe it is the appropriate place to discuss planned burning there. Rather, this section has included information on the different types of planned burning and would include the education of all stakeholders (all parties interested in effective and environmental management practices).</p> <p>Noted. Action:</p> <p>Text amended to include other potential types of planned burning.</p> <p>Noted. No action warranted.</p> <p>Current Tasmanian air pollution forecasts are not advanced enough to allow this to happen (see Objective 9).</p> <p>Noted. No action recommended.</p> <p>Noted. No action required.</p> <p>Noted. No action warranted.</p> <p>Councils and other appropriate authorities will be involved in development of the complaints system.</p>
<h2>Transport Sector</h2> <h3>Emissions from Vehicles</h3>		
<u>Objective 15</u>	Number of comments: 10	
<p>Reduce emissions from vehicles by:</p>	<p>Generally supported but need to promote the use of small vehicles. (5)</p>	<p>Noted. Action:</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
<p>Promoting improvements in vehicle fuel quality through national programs;</p> <p>Investigating the feasibility of introducing a Smoky Vehicle Programme;</p> <p>Promoting the inclusion of air quality impacts into the charging system for heavy vehicles;</p> <p>Promoting the conversion of heavy vehicles to LPG or CNG;</p> <p>Promoting alternative fuels;</p> <p>Promoting the uptake of hybrid cars;</p> <p>Investigating the means through which the age of Tasmania's bus fleet can be reduced;</p> <p>Investigating means to optimise the use of rail for the transport of freight;</p> <p>Promoting environmental considerations in government fleet purchasing policies;</p>	<p>Fully supported. (10)</p> <p>Would like to see more focus on emissions from older vehicles, as well as buses, and reporting of smoky vehicles. A phase-in of annual roadworthiness and environmental inspections also needs to be looked into. (28)</p> <p>Notes that Metro Tasmania are in the process of considering the viability of CNG powered buses. Believes any such decision here will be based on commercial grounds. (11)</p> <p>Suggests all cars over 2 litres engine capacity should be converted to LPG. (2)</p> <p>Does not believe that the Government should be involved in promoting alternative fuels, as this is a commercial decision based on pricing. (11)</p> <p>"Government vehicles (Metro buses and cars) should set an example by converting to LPG or CNG over the next 2-3 years, especially where operating in Launceston." (26)</p> <p>It would be sensible to include incentives, such as reduced registration fees for fuel-efficient vehicles as well as introducing alternative fuels for buses and other heavy transport operated by the Tasmanian Government. (30)</p> <p>Strongly supports the Compair 's efforts to convert Metro buses to CNG fuel and would like the State Government to help support this with funds for a refuelling station. Respondent would get involved in a pilot programme if it had State support. However, believes if no further action or initiative is taken by the State Government in 'creating a market' over the support which has occurred so far with rolling out the pipeline, then what has been proposed "...may just be platitudes". (8)</p>	<p>Amend last goal (15f) to: "Promoting the uptake of fuel efficient cars including hybrid vehicles".</p> <p>Noted. No action required.</p> <p>Noted. Action:</p> <p>The authors note that Objective 15 b refers to the possible development of a Smoky Vehicle programme, which would target all types of vehicles, the majority of which would likely be older vehicles. Objective 15b has been amended to include "...and regular vehicle tests" and comment added within the main text of the section.</p> <p>Noted. Action:</p> <p>The relevant section of the Explanatory Document has been updated accordingly. With regards to commercial considerations (alone?), the authors note the view taken by Housing Tasmania to insist on woodheaters for public housing that have far tighter specifications than the Australian Standard. It seems reasonable that externalities such as the impacts on health costs to the community should also be considered.</p> <p>Noted. Action:</p> <p>Objective 15 f has been amended to ""Promoting the uptake of fuel efficient cars including hybrid vehicles".</p> <p>Noted. No action recommended.</p> <p>The authors note that the triple bottom line needs to be considered, and not just the economic factors.</p> <p>Noted. No action warranted.</p> <p>The Strategy discusses this.</p> <p>Noted. No action recommended.</p> <p>At present there are no plans to pursue these incentives and indeed their impacts on air quality would have to be balanced against costs benefit analysis which may be best approached no a national scale. It should also be noted that while LPG has less environmental impacts, it still has an impact. The net benefit in converting to LPG relates to particles, VOCs and greenhouse gases. However, there may be disadvantages in terms of nitrogen oxides.</p> <p>Noted. Action:</p> <p>The text has been amended to include this comment.</p>

Strategy Objective	Summary of Comments From Respondents	Project Team and Steering Committee's Response
Promoting increased utilisation of public transport; and Promoting the use of non-motorised forms of travel.	"...we strongly endorse the construction of safe and accessible bicycle and pedestrian pathways along key routes being a consideration in land use planning and infrastructure design." (28)	Noted. Action: The authors have included information on some current healthy lifestyle initiatives.
<b>Integration of Planning</b> <b>Environmental Considerations in Planning</b>		
<b>Objective 16</b>	<b>Number of comments: 6</b>	
<p>To promote the better integration of environmental impacts, in particular air quality issues, within planning processes by:</p> <p>Promoting and providing training on the use of the Tasmanian Air Pollution Potential Atlas within Local Government planning processes;</p> <p>Preparing guidance material to assist in integrating air quality considerations into the development and implementation of planning schemes;</p> <p>Supporting and promoting the establishment of an environmentally sustainable housing demonstration project; and</p> <p>Promoting ways to integrate transport issues within Local Government planning schemes.</p>	<p>Generally supported, however, disincentives are needed for using cars in the CBD of cities. (5)</p> <p>Wants better planning controls for locating industry. (6)</p> <p>Believes this chosen title is interesting as no where else in this Strategy have the realisation of "sustainable development" outcomes through an integrated approach to regional/sub-regional land use/transportation planning been mentioned. (8)</p> <p>Considers that the Atlas will be a useful tool for regional planning, particularly for major metropolitan areas where wood heaters and vehicle emissions are concentrated. Cites the Derwent Estuary Programme as a model for regional air quality planning. (28)</p> <p>Identified as an interest for local government. (33)</p> <p>Strongly endorsed. Attached a copy of a position paper on <i>Integrated Land Use and Transport Planning</i> as part of their comments submission. This also meshes with current physical activity programs, which air quality is seen as the crucial link in these programs. The <i>National Charter of Integrated land Use and Transport Planning</i> is also strongly supported. (28)</p>	<p>Noted. Action:</p> <p>The focus of the Strategy is on incentives for alternative modes of transport to cars such as public transport and walking. Information has been added to the previous section on some of the current health lifestyle initiatives.</p> <p>Noted. No action warranted.</p> <p>This is up to local government and the planning scheme administered by the Council. When applications are received by Council there is generally a time-frame for representations to be made. Also when changes to Planning Schemes are made there is a considerable period for comment, approval by Council and the scheme must then be approved by the RPDC.</p> <p>Noted. No action recommended.</p> <p>Noted. No action required.</p> <p>Noted. No action required.</p> <p>Noted. Action:            A reference to the National Charter of Integrated Land Use and Transport Planning has been included in this section.</p>