

NEPM Variation Basic Submission Guide 2019

A more detailed submission guide can be found at: <https://www.envirojustice.org.au/national-pollution-standards/>

Australia's national air pollution standards, the National Environment Protection Measures (NEPM), are currently being reviewed by all Australian Governments. The NEPM was first established in 1998, so this is a rare opportunity to strengthen Australia's outdated air pollution standards and protect public health in line with modern scientific evidence.

The current review is for sulphur dioxide (SO₂), nitrogen dioxide (NO₂) and ozone (O₃). These three pollutants cause acute respiratory illnesses like asthma and lung disease. They can also lead to heart disease, and effect child development.

Australian standards for SO₂, NO₂, and O₃ are outdated, and currently exceed the World Health Organisation's recommended thresholds. Much stricter standards have been adopted in most other countries, including the US, EU, and China.

Air pollution is responsible for more than 3000 deaths in urban Australia per year. The annual health cost of air pollution to the community has been estimated at \$11-\$24 billion.

There is no safe threshold for exposure to air pollution. Health impacts have been studied and reported at concentrations well below the current and proposed NEPM standards. **Strong health-based standards are required now to minimise ongoing damage to the health of Australians.**

The objective of the NEPM is to "minimise the risk of adverse health impacts from exposure to air pollution for all people, wherever they may live". This would mean adopting monitoring and reporting standards that minimise the air pollution health burden in places like the Latrobe Valley and Hunter Valley. Currently, people in these communities are excluded from protection under the NEPM – a clear-cut example of environmental injustice. All Australians are entitled to equivalent protection under the NEPM.

Strict standards for NO₂, SO₂ and O₃ should be set to reflect international best practice, and the detailed standards proposed by Environmental Justice Australia and Doctors for the Environment Australia. This includes:

- **Make the 24-hour standard for SO₂ a compliance standard of 8ppb, in line with the World Health Organisation standard set in 2005.** Australia's current 24-hour SO₂ standard of 80ppb is 20 times higher than the WHO standard. The governments' proposed standard of 20ppb is still two and a half times higher than the WHO standard.
- **Make the annual average for NO₂ a compliance standard of 9ppb, in line with the science.** Recently published Australian health studies demonstrate statistically significant health impacts at pollutant concentrations well below the WHO standard for NO₂ of 19ppb. The

NO₂ standard of 9ppb is already met in all cities except Sydney and Melbourne, so it is both best practice and easily achievable.

These health-based standards can be met by controlling the pollution from coal-fired power stations, better vehicle emissions standards, and better urban planning.

The network of NEPM air pollution monitors should be expanded to reflect particular risks from widespread source emissions, such as major roadways. This includes urban roadside locations where people live, work and learn, including schools and childcare centres.

Air pollution is a matter of public interest. Communities have a right to know what they are breathing. **Air pollution monitoring data must be made publicly available through a coordinated national website, allowing access to real-time and historical data.**

Australia's broken air pollution regulatory scheme should be replaced with a national Clean Air Act. **We need a national set of laws to control air pollution and a national regulatory body to enforce and monitor compliance.** The Commonwealth Government should take responsibility for achieving clean air across Australia by implementing a national scheme for air pollution that the States and Territories comply with. The Commonwealth should be responsible for standard setting to ensure communities across Australia have the same strong level of protection.

Submissions close on **Wednesday 07 August 2019.**

Email your submission to: nepc@environment.gov.au

Alternatively you can post it to:
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National Environment Protection Council
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

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EJA acknowledges the expert advice and guidance provided by Doctors for the Environment Australia in compiling this guide.

If you make a submission to the NEPM variation, you do not need to confine yourself to the issues raised by EJA. Your submission will be more powerful if you write about the issues of most concern from your perspective. If you have any questions, please email max.smith@envirojustice.org.au.