



**Submission on the *Clean Air for NSW*  
Consultation Paper**

prepared by

**EDO NSW  
January 2017**

## About EDO NSW

EDO NSW is a community legal centre specialising in public interest environmental law. We help people who want to protect the environment through law. Our reputation is built on:

***Successful environmental outcomes using the law.*** With over 25 years' experience in environmental law, EDO NSW has a proven track record in achieving positive environmental outcomes for the community.

***Broad environmental expertise.*** EDO NSW is the acknowledged expert when it comes to the law and how it applies to the environment. We help the community to solve environmental issues by providing legal and scientific advice, community legal education and proposals for better laws.

***Independent and accessible services.*** As a non-government and not-for-profit legal centre, our services are provided without fear or favour. Anyone can contact us to get free initial legal advice about an environmental problem, with many of our services targeted at rural and regional communities.

EDO NSW is part of a national network of centres that help to protect the environment through law in their [states](#).

### Submitted to:

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## Introduction

EDO NSW welcomes the opportunity comment on the Consultation Paper for Clean Air for NSW (**Consultation Paper**). EDO NSW is a community legal centre specialising in public interest environmental law. Through our legal advice, law reform and community legal education services, we have provided legal advice on a range of issues relating to air quality in NSW for over 30 years.

We have written extensively on the need for improved pollution management, including air pollution management, in NSW. We therefore welcome the NSW Government commitment to clean air in NSW and the acknowledgment in the Consultation Paper (p 6) that:

*Everyone who is born, lives, plays, learns, works, travels, makes their home, does business, or grows old in NSW deserves to breathe clean air.*

The final Clean Air policy and its overarching goal should emphasise this positive statement, with its focus on equitable outcomes, and reference the need for continuous improvement. Achieving such a goal requires more specific measures of success than a single, average state-wide metric, which may disguise local or regional disparities.

We welcome the recognition in the Consultation Paper that achieving Clean Air for NSW requires a whole of government approach, working in partnership with industry and the community. We strongly support the position (p 18) that:

*Continuing and increasing measures that are positive for air quality, such as expansion of public transport systems, take-up of cleaner energy and technologies and planning that reduces air emissions from and impacts on communities, are also essential to future clean air in NSW.*

In our 2012 Discussion Paper - *Clearing the air: Opportunities for improved regulation of pollution in New South Wales*<sup>1</sup> (**Discussion Paper**) - we proposed an approach that:

- places duties on regulators and polluters to minimise and, where possible, eliminate pollutants from entering our environment;
- sets pollution management on an objective, scientifically-based foundation;
- strengthens the role of the EPA in strategic planning and decision making;
- strengthens the pollution licencing system and increases transparency around information relating to polluting activities;
- enhances and broadens the use of existing tools to minimise pollution loads and drive continual improvement;
- strengthens community engagement in pollution management decisions; and
- enhances the EPA's role as an independent regulator.

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<sup>1</sup> Environmental Defender's Office (2012) *Clearing the air: Opportunities for improved regulation of pollution in New South Wales*, Environmental Defender's Office (NSW) Ltd, Sydney, Australia, available at: [http://d3n8a8pro7vnm.cloudfront.net/edonsw/pages/280/attachments/original/1380668034/120322pollution\\_discussion\\_paper.pdf?1380668034](http://d3n8a8pro7vnm.cloudfront.net/edonsw/pages/280/attachments/original/1380668034/120322pollution_discussion_paper.pdf?1380668034)

These recommendations remain highly relevant to the Clean Air consultation.

Since then we have made a number of other relevant submissions noted here for your reference:

- the *National Clean Air Agreement* (EDOs of Australia (**EDOA**), 2015),<sup>2</sup>
- *Senate Inquiry on the Motor Vehicle Standards (Cheaper Transport) Bill 2014* (EDOA, 2015);<sup>3</sup>
- *Senate Inquiry into the retirement of coal fired power plants* (EDOA, 2016);<sup>4</sup>
- the *NSW Climate Change Fund – Draft Strategic Plan* (2016);<sup>5</sup> and
- most recently, the *Review of the NSW Load-based Licensing scheme* (2016).<sup>6</sup>

**Part One** of this submission makes comment on three key issues:

- A. Actions and timeframes,**
- B. Integrating air quality into planning decisions, and**
- C. Monitoring and measuring air pollution.**

**Part Two** of this submission responds to the Consultation Paper's *Priorities to reduce emissions and exposure*. Specific 'Goals' and 'Key Points' in the Paper are discussed in **Tables 1 and 2** below.

## **Part One – Three key issues**

### **A. Actions and timeframes**

While some actions within the Consultation Paper will contribute to delivering a system as proposed in our Discussion Paper, the current list of actions focuses heavily on further investigation of air quality matters at the apparent expense of detailed commitments to or timelines for action. This highly problematic for a 10 year plan.

Basing pollution management on an objective, scientifically based foundation is vital, however it should not prevent immediate and ongoing action to address known pollution issues. The Consultation Paper highlights numerous international examples of successful measures to address priority pollutants but the associated actions often simply specify more research.

The Consultation Plan should include SMARTER<sup>7</sup> targets for each priority area. This includes making shorter-term timeframes for clear regulatory action. It also means

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<sup>2</sup> EDOA *Submission on the National Clean Air Agreement* April 2015, available at: [http://www.edonsw.org.au/pollution\\_policy](http://www.edonsw.org.au/pollution_policy). [Download PDF](#)

<sup>3</sup> EDOA *Submission on Motor Vehicle Standards (Cheaper Transport) Bill 2014 Inquiry*, 2 October 2015, available at: [http://www.edonsw.org.au/climate\\_change\\_energy\\_policy](http://www.edonsw.org.au/climate_change_energy_policy). [Download PDF](#).

<sup>4</sup> Available at: [http://www.edonsw.org.au/climate\\_change\\_energy\\_policy](http://www.edonsw.org.au/climate_change_energy_policy). [Download PDF](#).

<sup>5</sup> Available at: [http://www.edonsw.org.au/climate\\_change\\_energy\\_policy](http://www.edonsw.org.au/climate_change_energy_policy). [Download PDF](#)

<sup>6</sup> Available at: [http://www.edonsw.org.au/pollution\\_policy](http://www.edonsw.org.au/pollution_policy).

<sup>7</sup> Specific, Measurable, Achievable, Relevant, Timely, Evaluate, Re-evaluate. Examples of such targets within the NSW Government include the 30 State Priorities and 12 Premier's Priorities (*NSW Making it Happen*, 2015).

developing specific, timely actions for high-pollution sectors and activities – such as coal mines, wood smoke, road transport, and off-road engines.

### ***B. Integrating air quality into planning decisions***

We agree that to deliver clean air for NSW it is necessary to implement clean air policies and practices through strategic land use policies and planning instruments (p 44). There is little evidence of such an approach to date and it is unclear how this will work for regional and district plans, SEPP reviews or imminent major developments. For example, one of the major planning and development processes currently underway in the Sydney region – the development of a new airport and associated city in Western Sydney – is in a known pollution hotspot. This is a direct contradiction to the principle of embedding clean air considerations in upfront planning processes.

The proposed response to this contradiction is apparently to develop a community air quality monitoring project (p 51). While this may be useful to demonstrate the scale of the problem, it will do nothing to address the actual sources and impacts of air pollution. Nor will the problem be adequately addressed through local community initiatives such as ‘managing individual exposure’. This is a clear instance where the planning system is failing to deliver clean air for the people of NSW. Similarly, suggesting that building new roads will improve air pollution due to the amount of time individual cars spend in traffic (p 45) is contrary to extensive research demonstrating that the construction of new roads leads to increased vehicle usage.

#### *Cumulative impacts*

Decisions at each stage of strategic planning, development assessment and pollution control should be integrated to manage the cumulative impacts of existing and emerging pollution sources in a strategic manner.<sup>8</sup> Decision-makers should be required to take into account a plan or project’s cumulative impacts in any decision on whether to approve it, and must reject the plan or project if these impacts will degrade the receiving environment (for example, the airshed). Strengthening the EPA’s role in developing solutions to regional pollution hotspots could support this, through tools such as Protection of the Environment Policies, which have not been used to date.<sup>9</sup>

At the next level of management, licensing of polluting facilities should be based on objective standards that maintain environmental health, rather than procedural requirements that do not consider the receiving environment. This is consistent with the legal objectives of the EPA.<sup>10</sup> Additional considerations, such as whether the licence holder is a fit and proper person, and long-term impacts of the proposed facility, should also be considered.

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<sup>8</sup> EDO NSW has produced an extensive body of recommendations for NSW planning law reforms - these can be found at: [http://www.edonsw.org.au/planning\\_development\\_heritage\\_policy](http://www.edonsw.org.au/planning_development_heritage_policy). We also work directly with the Department of Planning and Environment on initiatives such as improving environmental impacts assessment including for example, improved Health Impact Assessment for major projects.

<sup>9</sup> *Protection of the Environment Operations Act 1997* (NSW), Chapter 2, Protection of the Environment Policies.

<sup>10</sup> *Protection of the Environment Administration Act 1991*, s. 6.

*Good policy is supported by better laws*

For the benefits of up-front strategic planning to be realised, there is a need for amendments of relevant planning and pollution legislation, regulation and policy as a matter of urgency. Others Consultation Paper initiatives involve innovative uses of existing tools.

Regarding the potential linkages between clean air measures and the preparation of district plans for the Greater Sydney area, we refer to the 2016 *Environment Panel Advisory Paper* we collaborated on with the Greater Sydney Commission, Total Environment Centre and others – Part 3.8 Air quality.<sup>11</sup>

Regarding co-benefits between air quality and greenhouse gas emissions (Consultation Paper p 40), in 2016 we released a report on *Planning for climate change: How the NSW planning system can better tackle greenhouse gas emissions*. Many of its 14 recommendations are relevant to achieving co-benefits across pollution policy, climate change and planning systems.<sup>12</sup>

### ***C. Monitoring and measuring air pollution***

We welcome the Consultation Paper's commitment to measuring air pollution in a way that allows ongoing assessment of the success in reducing pollutants. However, we are concerned that the population weighting of the proposed Clean Air Metric (**CAM**) will not promote equal access to clean air.

*Goals and targets must embed equitable considerations*

Intragenerational equity is a principle of ecologically sustainable development (**ESD**):

*It involves people within the present generation having equal rights to benefit from the exploitation of resources and from the enjoyment of a clean and healthy environment.*<sup>13</sup>

ESD, in turn, is a guiding tenet of NSW pollution legislation and the EPA's functions.

While we acknowledge that "evidence tells us that the greatest public health gains will come from reducing long-term exposure of large populations to air pollution" (Consultation Paper p 8), people living outside large populations have an equal right to clean air. An attempt to measure average air quality should not replace the need to understand where individuals and local communities are suffering from pollution hotspots, and to aim for continuous improvement.

Goals, targets and measures of success must reflect this more equitable approach.

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<sup>11</sup> *Environment Panel Advisory Paper for the Greater Sydney Commission*, November 2016, Available at: [https://d3n8a8pro7vhm.cloudfront.net/boomerangalliance/pages/514/attachments/original/1481601304/TE024\\_EnviroPaper\\_151116-final.pdf?1481601304](https://d3n8a8pro7vhm.cloudfront.net/boomerangalliance/pages/514/attachments/original/1481601304/TE024_EnviroPaper_151116-final.pdf?1481601304).

<sup>12</sup> For example, see recommendations 12 and 14. Available at: [http://www.edonsw.org.au/planning\\_for\\_climate\\_change](http://www.edonsw.org.au/planning_for_climate_change)

<sup>13</sup> The Hon B.J. Preston, citing Prof. B. Boer (1995), in *Ecologically Sustainable Development in the Courts in Australia and Asia*, presentation to a seminar on environmental law, Wellington NZ, 28 August 2006.

Similarly, measuring air quality using rolling 3-year averages (p 14) has the potential to hide new or emerging pollution issues. Rather than use 3-year rolling averages to measure trends, it would be more appropriate to manually remove the impacts from exceptional (natural) events, such as bushfires and dust storms. What constitutes such an exceptional event should be clearly defined to ensure consistency in annual data.

We also note the recommendation in the NSW Chief Scientist's report on the NSW Coal Chain<sup>14</sup> that:

*NSW needs to adopt a two-pronged approach to air quality monitoring. One prong would maintain the State's current focus on background ambient air quality by way of its well-structured network of NEPM monitors. The second prong would be a more systematic focus on spatial and temporal distribution of air pollutants associated with pollutant-generating sources extending the approach of local monitoring required of some licensed industry activities; and broadening this to other locations and pollution sources which may or may not be subject to licenses.*

The Clean Air policy should demonstrate how it will adopt a more systematic focus on key sources and pollution hotspots, with sector-specific actions and timeframes.

**Part Two** of this submission continues below.

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<sup>14</sup> NSW Chief Scientist & Engineer *Final Report on the Independent Review of Rail Coal Dust Emissions Management Practices in the NSW Coal Chain* August 2016

## Part Two - Priorities to reduce emissions and exposure

We make the following comments in relation to:

- proposed Goals specified in the Consultation Paper (**Table 1**); and
- Key Points raised in the subsequent discussion – on Shared responsibility, Empowering and engaging stakeholders, Strengthening knowledge, and Evaluating and improving air quality management (**Table 2**).

**Table 1: Response to proposed Consultation Paper Goals**

<b>Proposed Goal</b>	<b>EDO NSW Comment</b>
<i>Strengthen and better target the EPA’s load-based licensing (LBL) scheme to extend and improve its effectiveness as a tool in managing air quality</i>	EDO NSW supports strengthening of the LBL scheme. We recently made a submission to the review of the LBL system. We refer the Air Policy Unit to that submission. <sup>15</sup>
<i>Minimise emissions from power stations to reduce primary and secondary particle precursors</i>	We support this goal but also strongly recommend regulating carbon and other greenhouse emissions as air pollutants. The status of the actions associated with the goal is unclear, as the Consultation Paper states that an initial report was due to be presented to Coal Innovation in late 2016. The Consultation Paper identifies that “ <i>the United States, Europe and China have successfully introduced standards for power station SO<sub>2</sub> and NOx emissions, based on currently available technology</i> ”. The final paper should include a requirement for the immediate implementation of best practice standards to reduce harmful emissions from power stations.
<i>The NSW Government will strengthen the rigour of the rehabilitation framework for mining projects to ensure that outcomes better meet the expectations of government and the community</i>	We strongly support this goal but the effectiveness of such a strategy under Clean Air for NSW is questionable given the action identified is that the NSW Government “could” develop a strategy. Any strategy to address the significant legacy issues associated with mine rehabilitation should be more holistic than simply improving air quality.

<sup>15</sup> EDO NSW Submission on the Review of the load-based licensing scheme, January 2017, available at: [http://www.edonsw.org.au/pollution\\_policy](http://www.edonsw.org.au/pollution_policy).

	In relation to mining, the final paper should include a greater focus on reducing operational emissions and limiting methane emissions from mining. The <i>State of the Environment 2015</i> <sup>16</sup> notes that 10% of NSW greenhouse gas emissions are fugitive emissions from coal mines.
<i>Minimise exposure to dust emissions in the Hunter rail corridor</i>	This is a clear example of a goal that is lacking SMARTER targets. There is extensive overseas research showing ways to minimise dust exposure from rail lines. This goal should also be broadened to include particulate matter (PM), particularly as it relate to diesel emissions from locomotives. (See also, our <i>Draft Amendment to Protection of the Environment Operations Regulation (Scheduled Activities) 2016 - rail freight - EDO NSW submission, June 2016</i> ). <sup>17</sup>
<i>Examine policies and incentives that could be adopted by the NSW Government to increase the uptake of electric vehicles</i>	We welcome policies and incentives to increase uptake of electric vehicles but it is equally important to ensure that these vehicles will be recharged by renewable energy. We support the Government identifying links for renewable energy and planning for electric car infrastructure (Consultation Paper p31).
<i>Investigate a mandatory emission performance standards policy for motor vehicles operated by or under NSW Government service contracts</i>	Australia has one of the oldest, and therefore highest emitting car fleets, in the developed world. Given the existing availability of vehicles meeting European standards, there should be an immediate required for Government purchases to conform with EU6/VI and a staged introduction for all vehicles in NSW and Australia. To encourage rapid take up of lower emissions vehicles, new measures such as pricing vehicle registration based on the scale of carbon and other emissions should be considered. <sup>18</sup>

<sup>16</sup> EPA, *NSW State of the Environment 2015*, 'Greenhouse gas emissions', p 38.

<sup>17</sup> Available at: [http://www.edonsw.org.au/pollution\\_policy](http://www.edonsw.org.au/pollution_policy)

<sup>18</sup> See also our: EDOs of Australia submission on Motor Vehicle Standards (Cheaper Transport) Bill 2014 Inquiry, 2 October 2015, available at: [http://www.edonsw.org.au/climate\\_change\\_energy\\_policy](http://www.edonsw.org.au/climate_change_energy_policy).

<p><i>Further reduce diesel emissions from priority sources</i></p>	<p>The final paper must specify the areas of diesel emissions to be targeted and present timelines for action. The existing <i>Diesel and Marine Emissions Management Strategy (DME Strategy)</i> is already behind target so greater investment will be needed to ensure that timelines are met. In addition to the actions proposed in the DME Strategy Environmental Protection Licences of major industrial users such as construction, mining, agricultural industries etc. should include:</p> <ul style="list-style-type: none"> <li>• particle filters fitted on all non-road equipment;</li> <li>• requirements for purchase of any diesel off road equipment to meet the latest emission standards available; and</li> <li>• use of low sulphur diesel for major non-road diesel equipment.</li> </ul>
<p><i>Reduce health impacts from air toxic emissions in petrol vapours, by extending vapour recovery requirements for new/upgraded petrol service stations and petrol depots to regional urban centres</i></p>	<p>Given the known health risks associated with the release of petrol vapours, the final paper should specify timeframes for implementing petrol bowser vapour recovery across NSW. This strategy should be supported by improved fuel standards.<sup>19</sup></p>
<p><i>Reduce exposure to fine particle pollution from domestic wood heaters</i></p>	<p>We support stronger regulation of new heaters but recommend additional focus on improving management of existing heaters, including mandatory wood heater servicing and testing for emissions compliance.</p>
<p><i>Reduce emissions from garden equipment and fuel storage containers, and support uptake of national actions to improve emissions standards for new garden equipment</i></p>	<p>The final paper should include an action to implement stronger standards for garden equipment and fuel tanks in NSW, in addition to promoting these standards at a national level.</p>

<p><i>Improved health outcomes and reduction in all health impacts of smoke across populations by reducing exposure to particle pollution from hazard reduction and open burning in metropolitan and regional NSW</i></p>	<p>This work should also be linked to programs such as the Hotspots Fire Project,<sup>20</sup> which is designed to increase community understanding of the role of fire in the Australian bush and to improve the management of fire across the landscape for ecological outcomes, while also protecting life and property.</p>
<p><i>Ensure NSW air quality monitoring networks meet government and community information needs</i></p>	<p>We support a review and expansion of the NSW Government air quality monitoring network, but recommend this be done concurrently with a review of, and enhanced reporting requirements for, industry monitoring. Many EDO NSW clients have been frustrated by their inability to access air quality monitoring data that directly affects them – despite EPA licencing requirements to undertake such monitoring. Industry should be required to make all data collected publicly available and these monitoring points should be considered in assessing the comprehensiveness of the existing network.<sup>21</sup> There should also be trial measurements for ultrafine particulate matter (PM<sub>1</sub>)</p>
<p><i>Expand the scope and enhance the accuracy of air quality forecasting capabilities in NSW</i></p>	<p>Enhanced forecasting should be supported by real-time reporting of existing air quality monitoring data.</p>
<p><i>Provide the best available information on air pollution and possible health impacts from major incidents, to inform emergency management responses and to reduce health impacts in communities affected by major incidents</i></p>	<p>This information should be assessed regularly so that the source of major health incidents can be addressed, but also so that any underlying patterns can be identified and analysed to minimise future recurrence of incidents where possible.</p>
<p><i>Promote more productive use of energy in the transport sector which could also lead to local air quality benefits, via for example:</i></p> <ul style="list-style-type: none"> <li>• <i>cleaner vehicles, such as electric and hybrid vehicles</i></li> <li>• <i>reduced road congestion</i></li> <li>• <i>increased use of public and active transport.</i></li> </ul>	<p>We strongly support improved energy efficiency and greater recognition of greenhouse gas pollutants generated in the transport sector. This should include Commonwealth and state consideration (under the National Clean Air Agreement) to phase-out and redirect existing subsidies such as the Fuel Tax Credits Scheme to the mining sector. The scheme reduces the cost of diesel and exacerbates pollution and GHG emissions.</p>

<sup>20</sup> See: <http://hotspotsfireproject.org.au/>

<sup>21</sup> See EDO NSW, *Submission on draft guidelines for the publication of monitoring data under the Protection of the Environment Operations Act 1997* (2012), [Download PDF](#).

**Table 2: Response to proposed Key Points in Consultation Paper**

Key Point	EDO NSW Comment
<b>Shared responsibility, p 41</b>	
<i>Establish an Interagency Taskforce on Air Quality in NSW to deliver and oversee the implementation of Clean Air for NSW.</i>	It is vital the members of the Taskforce have sufficient delegation authority to ensure that the necessary policy positions and activities are enacted in a timely and effective manner.
<p><i>Collaborate across NSW agencies to:</i></p> <ul style="list-style-type: none"> <li>• <i>Support improved knowledge, communication and consultation on air quality management in NSW</i></li> <li>• <i>Promote actions to directly improve air quality in NSW</i></li> <li>• <i>Maximise air quality benefits and mitigate or prevent adverse air outcomes from decisions that can impact on air, such as decisions on land-use and transport planning and climate change and energy policy</i></li> <li>• <i>Maximise potential co-benefits from clean air efforts, such as reduced greenhouse gas emissions and improved energy efficiency.</i></li> </ul>	<p>We strongly support greater collaboration across NSW agencies to reduce air pollution. Specific actions for improvement in NSW should include:</p> <ul style="list-style-type: none"> <li>• measurable limits must be set on the cumulative amounts of pollution allowable at a State, catchment and site level (for example, via EPA Protection of the Environment Policies);</li> <li>• review of planning approval regimes to incorporate measure such as buffer zones between certain facilities and residential areas;</li> <li>• integrating Health Impact Assessment into state development assessment laws. This should include comprehensive mandatory assessment of cumulative impacts of multiple projects in an area;</li> <li>• site specific 'Best Practice Management' assessment should be adopted as part of the EIA process;</li> <li>• developing a framework to implement 'continual improvement' and 'best available technology' in all industries, including ensuring that the five-yearly review of pollution licences includes a commitment to implementing these principles; and</li> <li>• reviewing and implementing the recommendations of the EDO NSW <i>Planning for Climate Change</i> report (2016).<sup>22</sup></li> </ul>

<sup>22</sup> Available at: [http://www.edonsw.org.au/planning\\_for\\_climate\\_change](http://www.edonsw.org.au/planning_for_climate_change).

<p><i>Work with the Commonwealth and across jurisdictions to champion national initiatives to improve air quality and public health in NSW and Australia-wide.</i></p>	<p>The EDOA <i>Submission on the National Clean Air Agreement</i>,<sup>23</sup> recommended that any National Clean Air Agreement should:</p> <ul style="list-style-type: none"> <li>• reduce systemic delays in improving air quality standards;</li> <li>• adopt continual improvement and best available technology frameworks to support the goal of 'sustained reduction in air pollution and exposure';</li> <li>• apply positive obligations to protect the environment as per the United States of America <i>Clean Air Act</i>;</li> <li>• make decisions in accordance with ecologically sustainable development;</li> <li>• adopt and enable 'next generation' air quality monitoring technology,</li> <li>• real-time publication and online access to air quality monitor information; and</li> <li>• manage ambient air pollution holistically with greenhouse reduction targets.</li> </ul>
<p><i>Support local government and community actions to improve air quality at a local and regional level.</i></p>	<p>EDO NSW consistently receives calls from community members who are unable to negotiate the separation of responsibilities between state and local government, or who reach the 'end of the line' when a council is unable or unwilling to take action. EPA should take a more proactive role in assisting community members to progress issues of concern regarding air pollution.</p>
<p><b><i>Empowering and engaging stakeholders, p 49</i></b></p>	
<p><i>Hold a NSW Clean Air Summit for government, stakeholders and the community to review air quality issues and set the basis for future engagement.</i></p>	<p>We support this initiative and would be happy to provide constructive input based on our legal expertise in advising individuals and communities affected by air quality issues.</p>
<p><i>Set in place a Clean Air stakeholder and community engagement plan that provides for:</i></p> <ul style="list-style-type: none"> <li>• <i>integration of engagement in all NSW clean air policy/actions</i></li> <li>• <i>early engagement, communication of engagement outcomes,</i></li> </ul>	<p>Adequately supporting community engagement will require improved access to information. Air quality data should be publicly available in real time with comprehensive summaries and analysis prepared regularly.</p>

<sup>23</sup> EDOA *Submission on the National Clean Air Agreement* April 2015, available at: [http://www.edonsw.org.au/pollution\\_policy](http://www.edonsw.org.au/pollution_policy). [Download PDF](#)

<p><i>enhancement and expansion of engagement tools, and commitment to best practice engagement approaches.</i></p>	
<p><b>Strengthening knowledge, p 53</b></p>	
<p><i>Maintain and enhance key knowledge tools for air quality management and communication with stakeholders:</i></p> <ul style="list-style-type: none"> <li>• <i>Review the NSW air quality monitoring network, to ensure it meets air quality management and community information needs across NSW</i></li> <li>• <i>Release a comprehensive NSW Air Quality Report for the Clean Air Summit</i></li> <li>• <i>Finalise and release updated air emissions inventory data, projections and analysis for the Clean Air Summit.</i></li> </ul>	<p>See our comments regarding improved access to data above.</p>
<p><i>Complete the Sydney Air Quality Study to support air quality management for major new areas of growth and the Sydney region as a whole.</i></p>	<p>We support this with a clear timeframe.</p>
<p><i>Continue to develop a comprehensive, robust, current and relevant body of research to inform air quality management in NSW and meet stakeholder needs, through the OEH/EPA Pollution Knowledge Strategy and specific air science, health and economic studies.</i></p>	<p>We support ongoing research but as has been stated elsewhere, this shouldn't delay action on pollutants when best practice measures are available and proven.</p>
<p><b>Evaluating and improving air quality management, p 58</b></p>	
<p><i>Set in place an integrated monitoring, evaluation and reporting system for Clean Air for NSW initiatives that includes:</i></p> <ul style="list-style-type: none"> <li>• <i>A population-weighted air quality metric for measuring progress towards the goal of improving average air quality across NSW</i></li> <li>• <i>Integration of evaluation into the development of all initiatives under Clean Air for NSW</i></li> <li>• <i>Annual reporting requirements for Clean Air goals and actions</i></li> <li>• <i>Development of a dedicated Clean Air for NSW webpage, where all relevant reports and links are available.</i></li> </ul>	<p>Effective evaluation of the final strategy will require SMARTER targets that can be objectively assessed. Equitable and sophisticated metrics are needed, beyond a statewide average air quality metric, to ensure that air quality is continuously improving for everyone in NSW (see for example the Minister's Foreword to Consultation Paper, p 6).</p>