

**Submission:**

**Fuel Efficiency Standard—  
Cleaner and Cheaper-to-run  
Cars for Australia**



**MAY 31<sup>ST</sup> 2023**

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**Clean Air Communities**

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# About Clean Air Communities

Clean Air Communities is a community advocacy and support group based in Naarm, Victoria Australia. We are concerned about the quality of the air we all breathe.

Our greatest focus is on residential solid fuel combustion pollution.

Although there is a perception that Australia has good air quality in general, it is poorly understood - due to a lack of national government education, that residential solid fuel combustion/wood-heater emissions is a significant source of hazardous fine particle pollution (PM2.5 – a Group 1 Carcinogen), in rural, regional and urban areas of Australia - and the top contributor in our major cities of Melbourne (51%) and Sydney (42%). (<https://www.car-cre.org.au/wood-heater-smoke-factsheet>).

Wood-heater air pollution is estimated to cost the Australian health system \$3.4 billion every year from households that use wood-heaters as a primary source of heating. (<https://www.uts.edu.au/about/faculty-engineering-and-information-technology/news/toxic-cost-wood-fired-heaters>).

Other sources of indoor and outdoor residential solid fuel combustion emissions such as fireplaces, secondary wood-heater users, fire pits, wood/charcoal BBQs, pizza ovens, food smokers etc is not quantified, but undoubtedly contributes to health impacts as significantly as wood-heater pollution, as it these forms of combustion are far less efficient with the outdoor sources being emitted at ground level, where exposure is greatest.

Clean Air Communities, through citizen science, community engagement and political lobbying, advocates for education and legislation that protects Australian health from the hazards of residential solid fuel combustion – and the protection of our forest ecosystems as critical to addressing the climate and biodiversity crisis.

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We advocate for the phasing out and elimination of highly polluting discretionary residential solid fuel combustion, especially wood burning, replacing this with clean, efficient and sustainable electricity – created by the increasing renewables sector for clean energy at source and as well as the user end.

More broadly we advocate for action on all forms of air pollution and climate policies and solutions that strive towards zero emissions through the phase out of all combustion and the electrification of everything. Our advocacy is based on the most up-to-date peer-reviewed science and information.

We all have a right to breathe clean fresh air, everywhere, all the time.

Learn more about our advocacy work via:

<https://www.facebook.com/groups/MyAirQualityAustralia>

<https://www.facebook.com/cleanaircommunities>

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***“Because no matter who we are or where we come from, we're all entitled to the basic human rights of clean air to breathe, clean water to drink, and healthy land to call home”***

***Martin Luther King III***

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# Executive Summary

Clean Air Communities is grateful for the opportunity to contribute to the Australian Government's consultation on the design of a fuel efficiency standard for Australia's light vehicle fleet.

Our view is that the government should strive to drive down all vehicle emissions, both particle pollution and greenhouse gases, as rapidly as possible through electrification of all vehicles by 2030, and in this transition stage to implement the most stringent fuel efficiency standards possible.

Driving down pollution levels also means transforming our transportation system so that public and active transport is accessible and affordable to people from all communities in Australia, shifting away from private vehicle use.

The focus of our submission is air quality and vehicle emissions.

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# Better Fuel Standards & Other Measures for Cleaner Air

There is a perception that Australia has generally good air quality esp. by international standards, but it is where people live in their communities that they experience hazardous levels of air pollution exposure - through residential combustion emissions and vehicle pollution, the two largest contributors to premature deaths and hospitalisations.

The recently released report by University of Melbourne estimates vehicle emissions may cause 10 times more deaths than vehicle accidents (by applying figures from the most recent research on New Zealand vehicle-emission impacts to the Australian population).

[https://www.unimelb.edu.au/\\_data/assets/pdf\\_file/0006/4498161/Expert-Position-Statement\\_Vehicle-emissions\\_FINAL.pdf?fbclid=IwAR2bqzU-q7oWU4sllfDIWeb298h5B-A5-abD\\_TayOBhPfLuYR8gyXwsbJho](https://www.unimelb.edu.au/_data/assets/pdf_file/0006/4498161/Expert-Position-Statement_Vehicle-emissions_FINAL.pdf?fbclid=IwAR2bqzU-q7oWU4sllfDIWeb298h5B-A5-abD_TayOBhPfLuYR8gyXwsbJho)

The Melbourne Climate Futures researchers found that vehicle emissions may contribute to:

- ▶ 11,105 premature deaths in adults per year
- ▶ 12,210 cardiovascular hospitalisations per year
- ▶ 6,840 respiratory hospitalisations per year
- ▶ 66,000 active asthma cases per year

As, contributor to the report, Assoc Prof Lou Irving said on ABC radio:

*"The time for proving it has passed; it's now the time to do something about it" – we agree.*

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## Continuous Improvement of air quality

The science tells us *there is no safe level of exposure to fine particle pollution* and that health impacts are experienced at very low levels of exposure; actions should be taken to continuously improve vehicle emissions through fuel efficiency standards and other measures.

We support the view of Centre for Air pollution, energy and health Research (CAR) expert, Professor Graeme Zosky from the University of Tasmania's Menzies Institute for Medical Research:

*“When it comes to regulating air pollution, we propose that Australia move away from standard setting and towards continuous improvements in air quality. This would mean setting targets for decreasing air pollution year on year. This is an approach that has been successfully applied in other countries.”*

<https://www.menzies.utas.edu.au/news-and-events/media-releases/2021/even-low-levels-of-air-pollution-are-harmful-to-health>

## Better Air Quality Monitoring

Air quality monitoring in Australia is largely dependent on expensive and limited numbers of government monitors, placed away from air pollution 'hot spots' such as busy roads.

We need major investment in high density networks of low-cost monitors where air pollution impacts Australians the most – where they live, work, play and sleep.

By accurately monitoring air quality where people live we can ensure that public health is being protected through low emissions strategies, and seek to make improvements if the data reveals issues exist.

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## Better Knowledge via Public Health Education Campaigns

The National Clean Air Agreement prioritises education as a key strategic approach:

***IV. Better knowledge, education and awareness** are essential requirements to inform policy decisions and to help empower communities and individuals to better deal with air pollution. Knowledge, improved through information sharing and research, is critical to plug existing data gaps, identify future trends and help focus efforts in managing air quality, and explore innovative measures to address air pollution. The Agreement's initial work plan also includes a two-year plan for reforms to improve the National Pollutant Inventory.*

Yet we have seen no concrete or substantial public health education campaigns that inform every Australian of the hazards of air pollution, and how they can protect themselves from exposure.

Therefore, we recommend that the government introduce a broad-based public health education campaign to inform and educate all Australians (including special programs for Aboriginal and Torres Islander peoples) of the harms of the two greatest contributors to local air pollution: woodsmoke/solid fuel combustion emissions and vehicle pollution – this campaign needs to be akin and of the scale of the Quit Smoking tobacco campaign. Australians have a right to be informed.

## Better Air Quality via Anti-Idling Legislation

It is 10 years since the Senate Inquiry *into Impacts on health of air quality in Australia* heard a recommendation in Chapter 5 that anti-idling laws be introduced. It is past time that such a simple measure be taken to protect communities esp schools from this unnecessary source of pollution.

[https://www.aph.gov.au/parliamentary\\_business/committees/senate/community\\_affairs/completed\\_inquiries/2010-13/airquality/report/c05](https://www.aph.gov.au/parliamentary_business/committees/senate/community_affairs/completed_inquiries/2010-13/airquality/report/c05)

End of Submission – thank you for your consideration.