

29 April, 2016

Ms Roslyn Agate

Director, Strategy and Business

Environment Protection Authority

Attention: Maria Zotti [maria.zotti@sa.gov.au](mailto:maria.zotti@sa.gov.au)

Thank you for your letter of 14 April, 2016, regarding feedback on the *draft Environment Protection (Air Quality) Policy 2016*. AFPA appreciates the opportunity to provide feedback. As mentioned in my email to Maria Zotti on 22 April, AFPA has now established a South Australian branch, so I will be the contact person for future correspondence about this matter.

### **Ground Level Concentration (GLC)**

AFPA welcomes the revised approach to assessing environmental risks and impacts from emissions, which will consider Ground Level Concentrations (GLCs) to be the primary evaluation tool. This is consistent with the scientific evidence regarding emissions.

However, the wording that states that the EPA must 'take into account' emissions criteria under schedules two, three and four creates some ambiguity. It could be interpreted to mean that there may be occasions that stack emissions (Schedule Four) would be applied with priority over GLCs. AFPA appreciates that this may not be the intent and is keen to see the ambiguity removed.

### **Total prohibition on Timber Preservation Chemicals**

Schedule One lists as prohibited substances '*other timber preservation chemicals*'. As stated in our original submission, there are a number of timber preservation chemicals which do not result in adverse impacts and are therefore currently permitted to be burnt in boilers in small amounts. There are also a number of treatment chemicals under development, which should be assessed on an individual basis. A blanket prohibition of '*other timber preservation chemicals*' is therefore of significant concern.

We emphasise again that this prohibition would result in negative environmental outcomes, as offcuts which contain these chemicals would instead be added to landfill.

The alternative and more appropriate approach is to retain the existing process which involves gaining approvals from the EPA to combust such materials, based on evidence from GLC assessments that the levels are safe.

## **Particulate limit**

AFPA notes that the particulate limit is still referenced to 12% by volume of CO<sub>2</sub>. Whilst gas and coal fuelled boilers typically operate at 12% CO<sub>2</sub>, biomass boilers operate at lower levels. The application of the higher fixed factor results in inaccurate assessment of the contribution to atmosphere of particulate from biomass-fuelled boilers.

We believe that discharge testing while the plant is running under normal conditions is the appropriate approach, with the particulate level referenced to standard temperature and pressure rather than to 12% CO<sub>2</sub>.

## **Implementation timeframe**

AFPA maintains its view that the proposed two-year timeframe for implementation of the changes will create an unreasonable burden on existing licence holders. Consultation with our members indicates that the capital investment required in order to comply ranges from millions to tens of millions of dollars, in some cases. Whilst our preferred approach is the progressive tightening of requirements for existing businesses (as adopted in New South Wales and described in our previous submission), in the absence of such an approach we strongly advocate for a minimum three year implementation timeframe. In addition, we emphasise that the existing ability to negotiate a longer timeframe (through Environmental Improvement Programs) with individual sites which are working towards changes to become compliant with new requirements, should be made explicit in the proposed new policy. This certainty is needed for companies to invest the significant capital amounts required for changes.

Again, thank you for the opportunity to offer further comment on the draft. Please contact me at AFPA-SA if you have any queries on this submission.

Yours sincerely

A handwritten signature in blue ink that reads "C. A. Scriven". The signature is written in a cursive style and is positioned above the printed name.

**Ms Clare Scriven**

SA State Manager, AFPA