



# Newport Residents Association Inc.

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5<sup>th</sup> May 2016

General Manager  
Pittwater Council  
PO Box 882  
Mona Vale NSW 1660

## Re: Wood Fire Air Pollution

We wish to thank Ms Robina Bramich for taking the time to meet with myself as President of the Newport Residents Association and Committee Member, Bill Thomson, on 21 April, to discuss the important matter of winter air pollution in Pittwater.

Our General meeting on Tuesday 19 April endorsed a proposal that the Association requests Pittwater Council to adopt a public stance which actively discourages residents from installing new solid fuel burning heaters, on the basis that the gaseous toxins and microfine particles (PM 2.5s) emitted by all solid fuel burning heaters are injurious to human health and that the topography of Pittwater potentiates the accumulation of high concentrations of pollutants in many sections of our air shed.

To achieve this, we asked Ms Bramich if certain amendments could be made to the Council's web sites covering;

- Air Pollution
- Wood Heating
- Installation Regulations for Wood Heaters

In confirmation of our discussion we attach copies of the councils relevant web pages, marked up with our suggested amendments, **in red**.

We believe that Council needs to emphasise the fact that a non-smoking fire is still polluting the atmosphere and that the invisible gases and microfine particle emissions from "modern" compliant wood heaters create health risks that are at least equal to those posed by visible "smoke".

We also suggest that the term **Wood Fire Pollution** be used instead of 'smoke' to describe heater emissions as this will cover the full spectrum of pollutants not just the visible, large particle, smoke component.

We particularly request that paragraph 2 of the "Wood Smoke" section of the "Air Pollution" web page be amended to delete the phrase "to prevent causing air pollution" and to replace it with, say, 'to help reduce air pollution'..... all fires create air pollution.  
In principle, Ms Bramich supported our proposals and agreed that the web pages in question could be amended to reflect our wish to discourage the installation of any type of solid fuel burner in Pittwater, bearing in mind that residents of certain areas, such as Scotland Island,

may not be influenced by the message. We understand that such a change in emphasis would be an administrative matter subject to Senior Management approval.

We were pleased to learn, from Ms Bramich, that the "Wood Heater buy- back offer" has been extended through 2016 and that those residents electing to replace wood burners with alternate clean heating sources may apply for grants of between \$500 and \$1,000. We commend the council for extending this offer. We would be pleased if this offer could be highlighted at the beginning of Council's web pages covering Wood Heating and Air Pollution.

Yours sincerely

Gavin Butler  
President

## ***Suggested Amendments to Council Webpage (in red)***

### **Air Pollution**

"Air pollution" means the emission into the air of any air impurity which includes smoke, dust (including fly ash), cinders, solid particles of any kind, gases, fumes, mists, odours and radioactive substances.

Air pollution can be associated with creating nuisances and acute health effects and may also cause long-term health problems. Apart from the impact on human health from air pollution, some pollutants can also damage vegetation and the built environment.

Council are authorised to regulate air pollution from stationary sources within the Pittwater local government area.

### **Current Air Quality**

Current indicators reveal that the air quality in NSW is generally good.

[Today's Air Quality Update - Regional Pollution Index.](#)

### **Wood Fire Pollution**

**Wood fires** cause a lot of air pollution. If you can see or smell smoke this may be causing a problem for yourself, your family and your neighbours.

To help reduce air pollution and/or smoke nuisances please ensure you follow these steps.

1. Don't let your heater smoulder overnight – keep enough air in the fire to maintain a flame.
2. Burn only dry, aged hardwood in your wood heater. Unseasoned wood has lots of moisture, which causes a fire to smoke.
3. Store your wood under cover in a dry, ventilated area. Freshly cut wood needs to be stored for at least eight to twelve months.
4. Never burn rubbish, driftwood or painted or treated wood. These are sure to pollute the air and can produce poisonous gases.
5. When lighting a cold heater, use plenty of dry kindling to establish a good fire quickly.
6. Use several small logs rather than one large log and stack them loosely in your heater, so air can circulate around them. Don't cram the firebox full.
7. Keep the flame lively and bright. Your fire should only smoke when you first light it and when you add extra fuel. Open the air controls fully for 5 minutes before and 15 to 20 minutes after reloading the heater.
8. Check your chimney regularly to see how well your fire is burning. If there is smoke coming from the chimney, increase the air supply to your fire.
9. Have the chimney cleaned every year to prevent creosote build-up.

10. If you are buying a wood heater, make sure it has a compliance plate showing it meets the Australian Standard (AS/NZS 4013:1999).
11. [Further information on selecting, installing and operating domestic solid fuel heaters.](#)  
A development application is required for the installation or relocation of a domestic solid fuel heater where a new penetration through the roof is required.
12. A development application is not required for the installation or relocation of a domestic solid fuel heater where the flue is installed inside an existing chimney, **however the attached Pre-installation Checklist and Certification must be completed and submitted to Council before work commences, and ideally before an appliance is purchased.**

## Pittwater is a No Open Burning Area

Under NSW pollution legislation, a person must not burn anything except in accordance with an approval (including vegetation):

- in the open, or in an incinerator in the Pittwater local government area.
- Please check out the Protection of the Environment Operations (Clean Air) Regulation (2002). On the spot fines may be issued for open burning offences.

## Making a Complaint

A smoky chimney from a wood fire heater can have pollution & health impacts on you and your neighbourhood.

In most cases, concerns about air pollution should be referred to the source or person causing the problem. However, if approaching the person causing the problem has not been or is unlikely to be successful please contact Council to make a complaint.

Air pollution at times is difficult to measure and observe as it usually depends on different sensitivities in different people and because odour levels vary significantly with weather conditions.

If [making a complaint to Council](#) about air pollution please include the following information:

- Time, date and duration of odour
- Weather conditions and wind direction
- Details in relation to the nature of the odour
- Details where the odour is likely to be coming from
- Your contact details

## Smoky Vehicles

One of the most important things we can do is use our vehicles responsibly and use public transport or car pooling when we can. Apart from reporting smoky vehicles to the EPA, we

can all help reduce pollution from our motor vehicles and lessen our impact on the environment.

[Contact the EPA to report a smoky vehicle.](#)

## **Related Websites**

- EPA - Regional Pollution Index
- EPA - Report a Smoky Vehicle
- EPA Woodsmoke Information

***(Note: We believe that this section should actively discourage the installation of any new wood burning fire)***

# Wood Heating

A development application is required for the installation or relocation of a domestic solid fuel heater where a new penetration through the roof is required.

A development application is not required for the installation or relocation of a domestic solid fuel heater where the flue is installed inside an existing chimney, **but the attached Pre-installation Checklist and Certification must be completed and submitted to Council before work commences, and ideally before an appliance is purchased.**

## [EPA's top tips for better wood heater operation](#)

- [Installation regulations](#)
- [Further information on selecting, installing and operating domestic solid fuel heaters.](#)

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## Wood Fire pollution

***(Note: We believe that this section should actively discourage the installation of any new wood burning fire)***

**Emissions** from wood or solid fuel heaters are a major cause of air pollution.

In fact, during winter, wood heaters can produce up to seven times more particle pollution than cars. **Not only is a wood fire expensive to operate**, but the air pollution it causes can affect our health.

Wood **fire emissions contain** noxious gases (including carbon monoxide, oxides of nitrogen and a range of organic compounds, some of which are toxic or carcinogenic) **as well as very fine invisible particles**, which go deep into the lungs **and enter the blood stream**.

## THE ODOUR OF A WOOD FIRE SIGNALS A HEALTH RISK.

**YOU DON'T NEED TO SEE SMOKE TO SUFFER HARM.**

## Who is at risk?

Wood **fire** pollution affects everyone. It is harmful to the health of wood heater users and the health of others in the community.

Health effects depend on the extent of a person's exposure to **the pollution**, one's age and current state of wellbeing. People who are more at risk are:

- infants and very young children
- those suffering from existing cardiac or respiratory conditions, such as asthma
- those with vascular complications from diabetes
- frail elderly people.

## What you can do

Wood fire pollution is not only a health risk around your home but also in your neighbourhood.

Follow the advice of NSW Chief Health Officer and avoid installing a wood burner in urban, built-up areas, if possible - instead install a reverse cycle air conditioner, or flued gas heater; both of which are cheaper to run and emit zero fine particle pollution.

Tips to help you make a difference, if you need to use a wood burner

- Burn Brighter this Winter – Instructional videos from the Tasmanian EPA on how to correctly operate your wood heater.
- If you have an existing wood fire, apply for a \$500 or \$ 1,000 grant from Pittwater Council to help you replace it with a clean, heating appliance such as a reverse cycle air conditioner, externally flued gas heater, ethanol burner.

## Installation regulations

- All installations of new and replacement domestic solid fuel heating appliances (wood heaters) shall comply with the requirements of Pittwater Council's planning instruments
- Development Consent and the approval of Council is required to be obtained prior to the commencement of works to install a domestic solid fuel heating appliance.
- **Complete the Pre-installation Checklist and submit to Council Prior to Installation and ideally prior to purchase of the appliance**
- The domestic solid fuel heater shall be designed, manufactured, selected, installed, maintained and operated in accordance with the NSW Environmental Protection Authority "Environmental Guidelines for Selecting, Installing and Operating Domestic Solid Fuel Heaters". <http://www.epa.nsw.gov.au/resources/woodsmoke/woodguide.pdf>
- The installation of the domestic solid fuel heater shall comply with the current Australian Standards (as amended):
  - **Domestic Solid Fuel Burning Appliances – Installation** AS2918:2001
  - **Domestic Solid Fuel Burning Appliances – Design and Construction** AS3869:1999
  - **Domestic solid fuel burning appliances - Method for determination of power output and efficiency** AS4012:2014 .

Appliances installed from 8 August 2015 must have an overall average efficiency levels not less than 55% in accordance with AS 4012:2014, Section 9.1.1(a).

  - **Domestic solid fuel burning appliances - Method for determination of flue gas emission.** AS4013: 2014

Appliances installed from 8 August 2015 must comply with the following:

(i) An appliance without a catalytic combustor shall have an appliance particulate emission factor not greater than 2.5 g/kg in accordance with AS 4013:2014, Section 7.1.1(a).

(ii) An appliance with a catalytic combustor shall have an appliance particulate emission factor not greater than 1.4 g/kg in accordance with AS 4013:2014, Section 7.1.2(a).

  - **Domestic Solid Fuel Burning Appliances - Test Fuels** AS4014:1999
  - Part 1: Hardwood
  - Part 2: Softwood
  - Part 3: Lignite briquettes
  - Part 4: Sub-bituminous coal
  - Part 6: 2007 wood pellets
- The domestic solid fuel heater shall carry a metal compliance plate in accordance with the Australian Standards.
- The installation of the domestic solid fuel heater shall comply with the requirements of the Building Code of Australia. **Note important clause of: BCA : Ref. AS2918.Cl. 4.9.1 (f) .."may not cause penetration through nearby windows .....other openings"**

- The external flue is to be installed so that the discharge height is a minimum of 600mm above any structure within a 3m horizontal radius, or according to the distances used in AS2918 Domestic Solid Fuel Burning Appliances – Installation (which ever is the greatest). Due to topography, proximity to neighbouring buildings and weather conditions in some cases it may be recommended that the minimum discharge height of the chimney is one metre above any structure within a 15 metre horizontal radius.
- The external chimney type is to be either a concentric shroud, venturi cowl or a parallel rain excluder.

*(We suggest that the following existing paragraph be highlighted).*

- **The operation of the wood heater shall not create odour or other wood smoke related environmental or public health nuisances to the public or neighbouring premises.**
- The installation of new or replacement open fireplaces indoors within dwellings is banned.

### Further information

Please contact Pittwater Council's Environmental Health Officers on 9970 1111 or email [Pittwater\\_Council@pittwater.nsw.gov](mailto:Pittwater_Council@pittwater.nsw.gov)

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Updated: \*\*\*\*\*

### Related Links

- [Burn Brighter this Winter](#) – videos from the Tasmanian EPA on how to correctly operate your wood heater.