4th December 2015

The Hon. Matthew Groom

Minister for Environment, Parks and Heritage

House of Assembly

Parliament House

Hobart 7000

[Minister.Groom@dpac.tas.gov.au](mailto:Minister.Groom@dpac.tas.gov.au)

Dear Sir,

Thank you for your letter dated the 30th November.

What you write is encouraging; however, there still appear to be areas of national concern that need addressing by Environment Ministers during the immediate NEPM variation process.

**National Reporting:**

You would be aware we have annual reporting mechanisms to show how well each jurisdiction is tracking where the EPA submits reports to the National Pollution Inventory (NPI) <http://www.npi.gov.au/npi-data/latest-data>

And, addresses compliance with the NEPM goals <http://epa.tas.gov.au/epa/annual-nepm-reports>. (Unfortunately the latest air monitoring report is missing).

Under the Tasmanian monitoring plan for reporting, our performance monitoring stations are located at Hobart, Launceston and Devonport.

We know our ambient air quality in other parts of Tasmania do not fare so well and are not reported because they come under the heading of Non-NEPM air monitoring.

Our excellent BLANkET monitoring system confirms this fact.

It confirms we need to report other than at major population areas as per current NEPM monitoring plans to give a true and proper indication of state-wide ambient air quality.

This reporting problem needs altering nationally during the NEPM variation process as it occurs in most, if not all, jurisdictions across Australia.

**Compliance:**

The accountability mechanism for these standards lies purely in monitoring and public reporting.

There is not a strict ‘compliance’ regime by which an exceedance leads to action being taken directly or immediately.

Further, there is not a really hard and fast distinction between ‘advisory’ and ‘compliance’.

These factors need addressing during the NEPM variation process on the 15th December.

**PM Standards:**

In relation to the annual average PM10 standard, what is proposed is less strict than any of the options assessed in the Impact Statement.

Can you please let me know what annual PM10 standard you intend to endorse on the 15th December and I trust it is not aligned with that which the NSW minister is advocating?

You mention, “…the proposed variation also includes ambitious 10-year goals for PM2.5…”

The Impact Statement for this variation proposed several options and yet ministers appear set to adopt the least strict of the PM2.5 options and annual average.

In the Agreed Statement from the 15th July, Meeting of Environment Ministers it states, “…Ministers agreed in-principle to adopt reporting standards for annual average and 24-hour PM2.5 particles of 8gm/m3 and 25gm/m3 respectively, with a move to 7ug/m3 and 20gm/m3 respectively over the longer term.”

We are already meeting the first set of figures and the reduced second set of figures projected over the next ten years does not appear to be overly ambitious.

It is most important to ensure that the standard and goals for PM2.5 are clear, measurable and genuinely ambitious in order to secure better public health outcomes.

Would you be so kind to please give these points your utmost consideration before and when you go into bat for all Australians on the 15th December?

I look forward to your reply; prior to the meeting if possible please.

Thank you again.

Yours sincerely,

Clive M. Stott