



TRIM 13/7705

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Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Dear Sir/Madam

**Senate Standing Committee on Community Affairs inquiry into the impacts on health of air quality in Australia**

Brimbank City Council welcomes the opportunity to make a submission to the inquiry into the impacts on health of air quality.

The City of Brimbank has a population of over 190,000, is located between 11 and 23 kilometres north-west of central Melbourne and covers over 123km<sup>2</sup>.

Council believes people and communities have a right to live, work and play in a healthy environment.

The key points of this submission are:

- Air quality in the City of Brimbank is compromised by the existence of numerous air polluting environments. Council is particularly concerned about the unreasonable level of dust and believes improvements in measurement, monitoring and prevention of dust are required.
- There is an unreasonable acceptance of greater dust levels in Brimbank, because the method used to measure acceptable levels of dust deposition takes into account background levels that are already high because of the natural environment of the Victorian Volcanic Plains Bioregion.
- More detailed investigation of the contribution of urban air pollution to lower respiratory infections, asthma and other chronic respiratory diseases should be undertaken.
- Support for improved environmental management, regulatory oversight by agencies such as EPA Victoria, and a focus on new sustainable industries will have health benefits for Brimbank and the rest of the western region.
- The Protocol for Environmental Management (PEM) for Mining and Extractive Industries should not be applied in urban areas. A new PEM could be devised specifically for all industries located in urban areas in proximity to sensitive uses, which incorporates capped dust deposition levels irrespective of the background level.

## **Community health**

Air is key to life and an important determinant of the quality of the environment in which people live, work and recreate. Consequently, air quality can impact either positively or negatively on the wellbeing of people and communities.

Council believes this relates largely to amenity and preventing nuisance, noting that the Victorian Department of Health's Burden of Disease Study (2001) states that urban air pollution accounts for only 0.1 per cent of the overall disease burden.

More detailed investigation of the contribution of urban air pollution to lower respiratory infections, asthma and other chronic respiratory diseases would be welcomed. Any such investigation should provide data at a municipal level to enable localised responses.

The National Environmental Health Strategy 2007-2012 positioned that people are entitled to an environment that promotes health. While environmental health is inherently equitable, there are some disadvantaged communities who are at greater risk of exposure to environmental hazards.

In Brimbank, air quality for the community is compromised by the existence of numerous air polluting activities. Council considers this is a social justice issue, in that people and communities have a right to a healthy environment.

## **Brimbank's history and industrial environment**

Brimbank has a history of industry, manufacturing and landfill activity that is closely tied to residential development through the Garden City movement at the turn of the twentieth century, post-war migration in the mid-twentieth century and then westward metropolitan expansion of the last two decades.

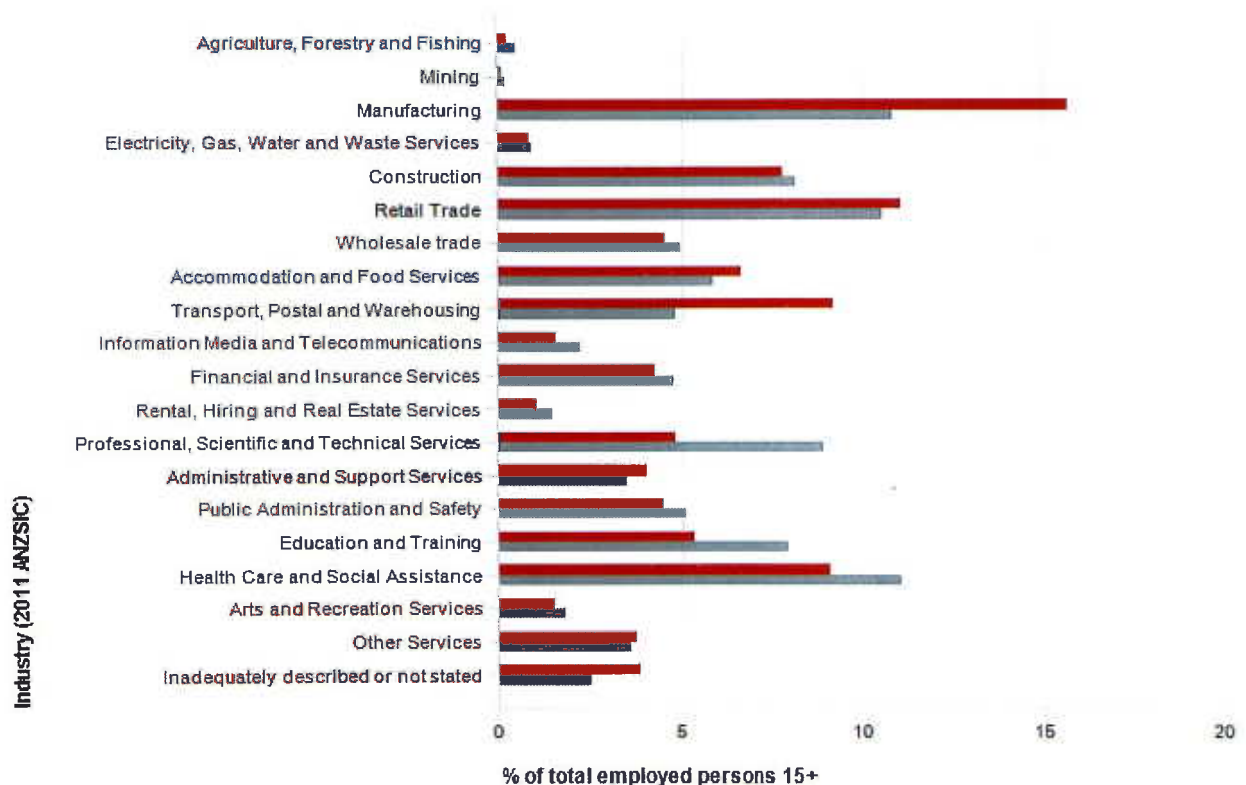
Historic development and current land use patterns have led to a situation where sensitive uses are located in proximity to potentially polluting activities, affecting air quality and the health and amenity of people. Historically, the community accepted many of the impacts associated with industry, manufacturing and landfills, including poorer air quality, because of the employment opportunities these activities represented. This is no longer the case, and there is a need to revise public policy responses and regulations to acknowledge the fact that, in relation to air quality, communities in Brimbank and the western region generally aspire to be provided with a healthier environment and improved amenity.

Manufacturing represents the highest employing industry sector in Brimbank providing 16% of local jobs. Combined with transport, warehousing and construction these sectors account for 33% of all employment in Brimbank. This proportion is particularly high when compared to employment that generally occurs outside industrial areas, including retail trade, education,

training and health care that account for a total of 26% of employment in Brimbank.

## Employment by industry, 2011

■ City of Brimbank ■ Greater Melbourne



Source: Australian Bureau of Statistics, Census of Population and Housing, 2011 (Usual residence data).  
Compiled and presented by id, the population experts.



The continued industrial and manufacturing uses in Brimbank (less so landfills), and the importance of these sectors to the local economy make the issue of addressing the impacts of air quality on health critical both now and in the future. Support for improved environmental management, regulatory oversight by agencies such as EPA Victoria, and a focus on new sustainable industries will have health as well as economic benefits for Brimbank and the rest of the western region.

Areas of focus for improved environmental management include chemicals and plastics, metal fabrication and materials recycling. Newly emerging, cleaner business clusters to be supported in Brimbank include:

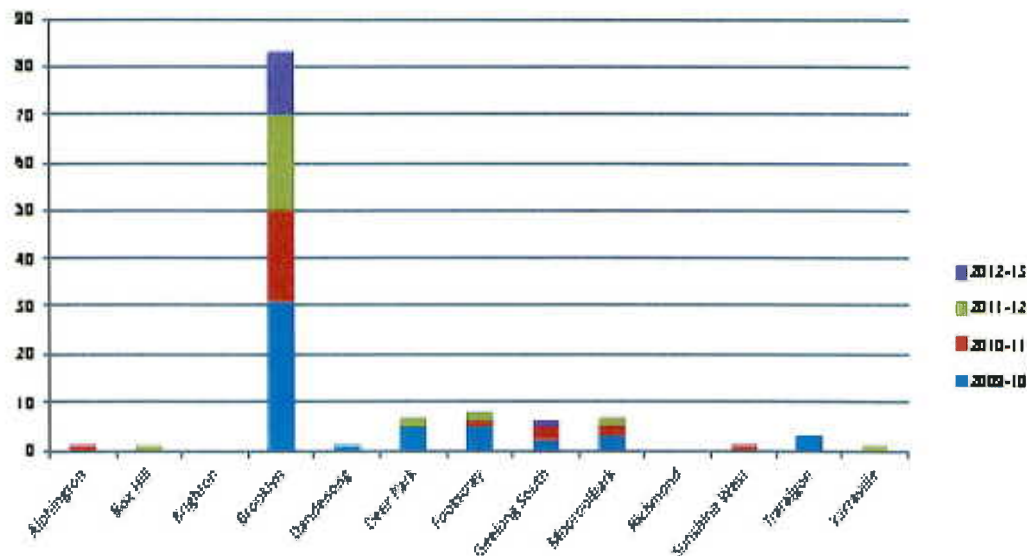
- building and construction products and services;
- electronics and process control;

- vehicle component design and manufacturing;
- precision engineering and tooling; and
- packaging.

**Case study: Brooklyn Industrial Precinct**

The Brooklyn Industrial Precinct is located in the City of Brimbank and is 13km west from central Melbourne. Brooklyn is one of the oldest industrial areas in metropolitan Melbourne and features a number of established heavy industries, including materials recycling, landfills, quarries and abattoirs. The industrial and landfill activities in Brooklyn take place close to residential areas in the adjoining municipalities of Hobsons Bay and Maribyrnong.

Due to the prevailing winds, the dust and odours created by these industries and landfills impacts on the quality of life of residents in the areas located to the south-east. The diagram below displays the PM10 exceedences in the Port Phillip network, highlighting the exceptional prevalence of dust in Brooklyn.



Source:BCRG minutes EPA presentation

Brooklyn residents are exposed more often to higher levels of poor quality air (mainly dust) than any other area within Melbourne and parts of Victoria. The issue of poor quality air and dust can create wide ranging economic and health effects.

Council has adopted a strategic document to plan for the future of the Brooklyn Industrial Precinct, "The Brooklyn Evolution", that recognises the need for the industries to improve practices to the highest standards. Council has undertaken several years of coordinated compliance action with EPA Victoria under State environment and planning legislation. This has brought about

progressive improvements in the area. The partnership approach between Council and EPA Victoria has been beneficial in tackling the environmental amenity issues in the area, including dust.

### **Standards, monitoring and regulation of air quality**

The guidelines for measuring acceptable dust deposition levels only allow the consideration of health impacts associated with small particles of dust, which has the potential to affect lung function. There is no minimum measurement for large particles of dust which can cause nuisance and in turn has the potential to affect mental health.

The amount of dust in an area is measured by assessing the dust deposition level. This level is calculated by assessing whether the level of dust deposition surrounding the source area is elevated compared to the normal dust background level.

The City of Brimbank is located within the Victorian Volcanic Plains Bioregion. The natural environment of this bioregion is the source of significant dust, particularly in periods of drought. The generally high total dust deposition means that normal dust background levels are elevated when compared to other areas where there is more foliage and less exposed soil.

This leads to an acceptance (by monitoring agencies) of greater dust levels in Brimbank, because the method used to measure acceptable levels of dust deposition takes into account background levels.

Dust levels are also regulated to an appropriate Protocol for Environmental Management (PEM) which is approved by EPA Victoria.

In general, the most dust polluting industries include landfills and quarries. EPA Victoria recommends the PEM for Mining and Extractive Industries be used in these circumstances. The PEM is an incorporated document to the Victorian State Environment Protection Policy (Air Quality Management). This is out-dated and does not create acceptable outcomes for the community. A new PEM should be devised specifically for all industries located within certain distances of sensitive uses, which incorporates capped dust deposition levels irrespective of the dust background level.

This dust deposition level could be determined through measuring the average dust deposition level in the majority of Metropolitan Melbourne and creating an acceptable residential dust level. Buffer distances could be specified according to the industry and the potential it has to cause unacceptable dust deposition levels. The new PEM should also include a requirement for minimum levels of large and small dust particles.

If you have any questions about this submission, please contact Stuart Menzies,  
Acting General Manager City Development.

Yours faithfully

**John Watson**

**Chair of Administrators**