

# Submission to the Legislative Council's Inquiry into Air Pollution in Victoria

**Latrobe City Council**

**March 2021**



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## INTRODUCTION

Latrobe City Council welcomes the opportunity to provide a submission to the Inquiry into Air Pollution in Victoria. We congratulate the State Government for the initiation of this Inquiry to examine in greater detail actions to minimise the negative health impacts of air pollution acknowledging the relevance of this Inquiry to the Latrobe City community.

Latrobe City Council understands that the Environment and Planning Committee is to prepare a report by 29

October 2021, identifying actions to minimise the health impacts of air pollution, including, but not limited to:

- (a) state-wide practical, real-time, cost-effective mitigation strategies;
- (b) ensuring that Victorian air quality continues to track towards meeting or exceeding current international best practice standards and is enforced;
- (c) the impact of economic and population growth on air pollution and health outcomes;
- (d) strengthening commitments across all Victorian Government portfolios to reduce air pollution and minimise the impact on health; and
- (e) any other related matters

This submission responds to each element of the inquiry.

In preparing this submission, Latrobe City Council considered its various roles and responsibilities including:

- Emergency management planning and response
- Responsible Planning authority
- Our role in advocacy representing the interests of our community
- Responsibility for preparation and implementation of a Municipal Public Health and Wellbeing Plan.

It is the ongoing commitment of Council to speak on behalf of its community. It is through this theme that Council makes its comments to the Environment and Planning Committee.

We note that our response is preliminary in nature and welcome the opportunity to participate in further consultations offering our support to the Environment and Planning Committee in undertaking its Inquiry.



## EXECUTIVE SUMMARY

An overview of Latrobe City Council observations and recommendations to the Environment and Planning Committee is provided below. Each of these are further expanded upon within the remaining submission.

Key observations and recommendations:

- The impact of major employing industries to air quality and overall community health outcomes and acknowledging the centrality of these industries to socio – economic conditions of Latrobe City is both significant and complex.
- Whilst appreciating the importance of major industry developments, Latrobe City Council understand that community health must also be a central consideration. Latrobe City Council therefore holds the strong view that the consideration of actions to monitor and improve air quality should be undertaken with appropriate engagement with the Latrobe City community.
- Latrobe Valley is home to some of the heaviest industry in Victoria and during 2014 residents experienced months of poor air quality as a result of the Hazelwood Mine Fire. Community concerns regarding air quality were recently voiced as part of Councillor listening posts associated with a proposal for a Used Lead Acid Battery (Ulab) Facility for Hazelwood North. The capacity to meaningfully respond to these concerns was limited due to the lack of monitoring and benchmarking against international standards .
- The actioning of recommendations provided by the Victorian Auditor General's Office (VAGO) audit of Environment Protection Authority (EPA) air monitoring should be prioritised, in particular improving oversight of 'high-risk operators' air quality monitoring and reporting.
- Community response to the recent Used Lead Acid Battery Recycling Facility highlighted a lack of confidence in the EPA to ensure compliance with emission standards. Adequacy of current standards for lead emissions and separation/buffer distances from sensitive uses were called into question by the community.
- The requirement for continuous monitoring and 'real time' reporting and posting of air pollution information from major industries would likely support greater confidence by the community and ensure greater accountability of operators due to the transparency and dissemination of information. The Latrobe Valley Intelligence Network (LVIN) provides a working example of this.
- The impact of changed regulations to further reduce air pollution from major industries must be accompanied by Government assistance to support compliance whilst not resulting in undue financial burden and risk to local employment opportunities. Such assistance being provided to industry is considered appropriate acknowledging the public good outcome of improved community health.





- The scope and focus of the Latrobe Health Innovation Zone (LHIZ) could be broadened to directly consider air pollution and its impacts on local health outcomes. The LHIZ would be well placed to support conversations with the community regarding possible measures to reduce air pollution in Latrobe City and broader region.
- The support from all portfolios of Government will be necessary to achieving the necessary structural changes to substantially reduce air pollution.

### **(a) STATE-WIDE PRACTICAL, REAL-TIME, COST-EFFECTIVE MITIGATION STRATEGIES;**

Clean Air for All Victorians.

The Victorian government initiated the development of an Air Quality Strategy in 2018 - Clean Air for All Victorians. The release of Victoria's Air Quality Statement saw the commencement of engagement about future air quality management and included some ideas on what could be done to protect air quality over the coming decades, such as:

- Improving understanding of where and when air pollution occurs
- Reducing the occurrence of air pollution
- Empowering communities to tackle local air pollution issues
- Tackling emerging air quality challenges

It is understood that consultations commenced from May 2018 and included public forums being held in Melbourne, Ballarat and the Yarra Valley. No similar events were held within the Latrobe City or Gippsland Region.

The release of the Victorian Air Quality Strategy was anticipated during 2019, however no policy has yet been released. It is assumed that the current Inquiry to examine in greater detail, actions to minimise air pollution may be utilised to inform the anticipated completion of such strategy.

### **Improving Victoria's Air Quality - Audit Report March 2018**

The Victorian Auditor General's Office (VAGO) audit of Environment Protection Authority (EPA) air monitoring obligations were completed March 2018. This audit assessed Victoria's air quality, ozone and PM (Particulate Matter pollution) standards. It is also understood that the audit included a review of the EPA's monitoring, reporting and regulation of air quality.

The EPA is established as the principal agency responsible for the protection of Victoria's environment, including preventing or controlling pollution such as the discharge or emission of waste into the atmosphere.

The report explained that the EPA primarily relies upon the community and industry operators to report inappropriate or noncompliant air emissions. EPA then investigates these reports to confirm whether any noncompliance has occurred.





The VAGO reports notes that self-regulation assumes that operators have appropriate processes to reliably monitor air discharges and will voluntarily report any breaches of their licences. However, many of the operators audited by EPA between 2014 and 2016 either did not have monitoring plans, had weak monitoring processes, or under-reported breaches. Further, EPA advised that obtaining sufficient and reliable evidence to show operators' noncompliance with air discharge conditions is a major challenge for its enforcement efforts.

The recently revised Environment Protection (EP) legislation which came into effect mid 2020 focuses on preventing waste and pollution impacts, rather than managing those impacts after they have occurred. The cornerstone of the new EP legislation is the General Environmental Duty (GED). Acknowledging VAGO's observations, continued reliance on self-regulation and identification of breaches is concerning and does not support increased community confidence nor education or awareness.

Key observations from the 2018 VAGO audit include:

- EPA does not currently produce a reliable or representative measures of ambient air quality, has not implemented monitoring systems required and does not collect information on air quality for most of the state despite being required to do so under air pollution law.
- Instances of inaccurate assessments against PM air quality standards were identified—all of which overstated air quality, and so serve to undermine confidence in publicly reported data.
- That the responsibilities of agencies for air quality management remain unclear and not well understood. Consequently, attempts to address air quality issues have not always been well coordinated and implemented.
- EPA regulation of air pollution sources has begun to improve through embedding its risk-based approach into its licensing requirements and developing programs to enhance its compliance efforts—for example, with its major industry assessments and annual performance statement (APS) audits

VAGO recommended that the EPA:

- Expand its air quality monitoring network, including reviewing and updating its current air quality management plan and better aligning monitoring coverage with air pollution risks.
- Improve its air quality reporting, by introducing a rigorous data quality review process and developing readable and easily accessible reports, highlighting assessments against standards and recorded exceedances.
- Expand and update its knowledge of Victoria's air quality, through completing a comprehensive emissions inventory, improving oversight of high-risk operators' air quality monitoring and better understanding and responding to air emissions.



- Recommended that the Department of Environment, Land, Water and Planning (DELWP) and EPA clarify government agencies' roles and responsibilities in air quality management, and ensure accountabilities are understood and coordination is achieved.

The recommendations of VAGO are supported by Latrobe City Council.

#### **Power Station Licence Review:**

The Environment Protection Authority (EPA) recently completed its review of the licences of the three Latrobe Valley power stations – AGL Loy Yang A, Alinta Loy Yang B and Energy Australia Yallourn – as part of its periodic licence review program.

Section 20 of the Act prohibits the discharge of emissions or waste by the Power Stations unless licenced under the Act. Waste is defined in the Act to include Greenhouse Gas substance discharged into the environment.

According to air modelling undertaken as part of the 2018 power station licence review on behalf of power station generators, standards for a range of air contaminants are often breached and/or routinely reaching the standard in Latrobe Valley (Grey, Andrew, Review of GHD's Modelling Assessment and Analysis of the Coal-Fired Power Stations in the Latrobe Valley (September 2018). Where exceedances were captured by industry-run monitors, it remains unclear what response actions may have been undertaken by industry or EPA.

The lack of real time monitoring also impedes the capacity of local communities to take precautionary measures when there is a breach. This adds to the risk of an illness episode for people with respiratory conditions.

The results of the license review were recently released, the EPA announcing that the three brown coal-fired station licences will have limits for oxides of nitrogen (NOx), sulphur dioxide (SO<sub>2</sub>), carbon monoxide (CO), mercury (Hg) (new), coarse particles (PM<sub>10</sub>) and fine particles (PM<sub>2.5</sub>) (currently just total particles) to comply with the State Environment Protection Policy (Air Quality Management).

These announcements are welcomed however it is unclear how monitoring these will support the community to respond on a poorer air quality day given reporting will be retrospective and indicating in general terms whether emissions are within range.

It is understood that no limitations were introduced to the emission of CO<sub>2</sub> and that licence requirements for Power Station Operations in Victoria remain below those of other countries including the United States, Europe and China.

Latrobe City Council is unclear of the relationship between the recent announcement of EPA license renewals for energy generators, the extent of new emission controls now required under the revised licenses and whether the current Inquiry into Air Pollution will explore further improvements to the reduce emissions from energy generators operating within Latrobe City.

It is understandable that there would likely be a reluctance to invest in further substantial emission reductions treatments of power stations within Victoria given pending closures (most recently



announced for the Yallourn Power Station closure to 2028). However, should such measures be required by government regulation, this would necessarily be accompanied by Government support acknowledging the public good outcomes of immediate community health benefits from reduced air pollution, provide potential for such industries to increase their operating life beyond current forecasts and align with State Government Emission Reduction targets for 2050.

In considering the issue of energy and mining operations it is Council's view that the needs and aspirations of the community in regard to environmental and public health considerations should be given a high priority.

**(b) ENSURING THAT VICTORIAN AIR QUALITY CONTINUES TO TRACK TOWARDS MEETING OR EXCEEDING CURRENT INTERNATIONAL BEST PRACTICE STANDARDS AND IS ENFORCED;**

**Environment Protection Authority (EPA) responsibilities**

The EPA are responsible to protect Victoria's air quality through implementing environmental laws, policies and regulations, and by working in partnership with Victorian communities and business. The Environment Protection Act (the Act) provides powers to deliver upon these responsibilities. Clause 18(3) of the SEPP AQM states that Generators must:

- a) Pursue continuous improvement in their environmental management practices and environmental performance; and
- b) Apply best practice to the management of their emissions or, if they emit Class 3 indicators, reduce those emissions to the maximum extent possible.

The State environment protection policy (SEPP) (Air Quality Management) 2001 currently defines best practice "means the best combination of eco-efficient techniques, methods, processes or technology used in an industry sector or activity that demonstrably minimises the environmental impact of a generator of emissions in that industry sector or activity"

The EPA's Variation to SEPP (AQM) and (AAQ) Policy Impact Assessment 10 states that 'Generators of emissions should be seeking to employ what is regarded as the best approach in their industry sector or activity to the minimisation of emissions.'

In circumstances where the Generators' have demonstrated non-compliance with the legislative framework, the Act requires the EPA to provide specific guidance and update licence obligations to ensure compliance.

Acknowledging the 2018 VAGO audit and the limitations of EPA in meeting its requirements, it is considered that greater resourcing and support to the EPA to fulfil its duties would provide greater confidence to community that industry air pollution is being actively addressed.

Given concerns raised by the Latrobe City community regarding outdated standards applied to the assessment of industrial emissions, Latrobe City Council would also support a direction whereby the





EPA standards were to be reviewed and amended in alignment with best practice international standards. Any changes required to subordinate instruments would require a Regulatory Impact Statement allowing industry comment and implications to be understood.

### **(c) THE IMPACT OF ECONOMIC AND POPULATION GROWTH ON AIR POLLUTION AND HEALTH OUTCOMES;**

While the broader community understands the economic importance of the coal resource, council advises there is a degree of sensitivity about existing and future land use conflicts and the associated community health and safety concerns resulting from energy and mining operations and other major industry developments.

Latrobe City Council therefore expects that future heavy industry developments will be largely dependent on projects that are technically sound, commercially viable and socially acceptable. This view is emphasised by recent events including the Hazelwood mine fire and the recent approval by the Planning Minister of the Used Lead Acid Battery Recycling Plant near Morwell.

The consideration of air pollution within the context of the Latrobe City remains challenging, given the long standing associations with energy generation and other heavy industry developments ( i.e. coal fire power stations, pulp and paper production). The impact of these major employing industries to air quality and the centrality of these industries to socio – economic conditions along with overall community health outcomes are significant and complex.

Latrobe City Council acknowledges the dichotomy whereby the phased closure of coal fire powered stations would result in improved air quality and community health outcomes, however is also mindful of the potential secondary health and wellbeing impacts – including unemployment, reduced housing security, domestic violence and broader mental health considerations which may result.

The Latrobe City community and government, have over the previous decade, shared the common objective of diversifying the economy and supporting alternate industry investment and employment creation necessary for a 'just transition' and to mitigate the extent of disruption to community and economy.

An alternative view however might suggest that the early deployment of available technologies to reduce emissions (including point source treatment options and / or secondary Carbon Capture and Storage) from generators and industry would dramatically improve air quality in the short term and with this may provide opportunities to support their extended operation, delivering immediate health benefits and aligning with State Government 2050 emissions targets.

Whilst appreciating the importance of these industries, Latrobe City Council also understands that community health must also be a central consideration. Latrobe City Council therefore holds the strong view that the consideration of actions to improve air quality should be undertaken with appropriate engagement with the Latrobe City community.



#### **(d) STRENGTHENING COMMITMENTS ACROSS ALL VICTORIAN GOVERNMENT PORTFOLIOS TO REDUCE AIR POLLUTION AND MINIMISE THE IMPACT ON HEALTH; AND**

The support from all portfolios of Government will be necessary to achieving the necessary structural changes to substantially reduce air pollution.

Latrobe City Council is itself active in reducing carbon emissions and energy usage across its operations, focusing primarily on Carbon emission reductions. Example activities currently being undertaken include:

- Continued investment in solar panels across Council assets.
- Offsetting Council fleet emissions through annual tree planting,
- Introduction of hybrid pool fleet vehicles,
- Management of landfill emissions through capture, flaring and energy generation technology.
- Utility auditing and reporting.
- Ongoing membership and support to the Gippsland Climate Change Network.
- Representation on the CarbonNet Community Consultative Committee.

Local Government responsibilities for Municipal Public Health and Wellbeing

Latrobe City Council is charged by the State under the Public Health and Wellbeing Act, to develop and implement a Municipal Public Health and Wellbeing Plan.

The aim of the Municipal Public Health and Wellbeing Plan (MPHWP) is to achieve maximum levels of health and wellbeing through identifying and assessing the actual and potential public health issues in the community and outlining strategies and actions to prevent or minimise them.

The Municipal Health and Wellbeing Plan is the overarching strategic vehicle through which all partners and the community should seek to deliver change, arrest or transform a range of health outcomes currently within the Latrobe Valley.

Council's interest in working to enhance the health and wellbeing outcomes of its community are central to its work in this space and is naturally aligned to the Inquiry's consideration of implications of air pollution to community health outcomes. Council is therefore supportive of the Terms of Reference of the Board of Inquiry and recommends that it consider the role of the MPHWP in actions it may recommend.

#### **(E) OTHER RELATED MATTERS**

##### **Latrobe Health Innovation Zone**



The Victorian Government established the Latrobe Health Innovation Zone (LHIZ) in 2016 to improve the health and wellbeing of residents in Latrobe City, with partners, local health providers and the community working together to drive innovation and change.

The LHIZ provides a focal point for coordination and integration of health services and supports a range of health-related projects.

Relevant to air pollution the Gippsland Primary Health Network findings from 2016 community engagement reported that the community is concerned about air pollution in the Latrobe Valley.

Information published by the LHIZ has found that the Latrobe Valley has amongst the highest percentage of use of asthma medications with 37% of children aged 3 to 19 using asthma medications (compared to 24% for the state average).

Data from the Gippsland Primary Health Network indicates that avoidable deaths from respiratory disease are approximately double in the Latrobe Valley compared with the Victorian average. Deaths and hospitalisations from chronic obstructive lung disease are also close to double the Victorian average. It is acknowledged that there is a high proportion of smoking within the community, however this is likely to be less relevant within younger age demographics who also present poor respiratory health.

Council supports any ongoing, long term financial investment in the health and wellbeing of the Latrobe City community, but notes that this investment must include the funding and delivery of transformational actions with a view to a strength's based community led approach. As such, a focus on prevention and early intervention is considered a priority.

Relevant to this Inquiry the scope and focus of actions being undertaken by the LHIZ may broadened to directly consider air pollution and its impacts on local health outcomes.

Council continues to support opportunities for the community to be involved and to have considerable ownership and input into both the concept, operations and development of a Health Innovation Zone.

The Health Innovation Zone may provide a valuable forum from which the Environment and Planning Committee is well placed to work in partnership with Council for ongoing conversations with the community about possible measures to reduce air pollution and its impact on health within Latrobe City and broader region.

### **Improvements to Air quality monitoring and reporting**

Improvement to air quality monitoring is essential to transparency, accountability and with this community confidence in industry and regulators.

No industry in Victoria, is legally obliged to make its stack emissions monitoring data publicly available. Access to stack emissions monitoring data is presently subject to a Freedom of Information request which is a lengthy and cumbersome process, subject to review and redaction.





It is however understood that Continuous Emissions Monitoring Systems (CEMS) for PM's are widely available and have been for at least 18 years.

An example of this is provided by the Office of Environment and Heritage in NSW provides real-time air pollution information, including the Upper Hunter Air Quality Monitoring Network. Victoria has no similar data capture or reporting systems, rather it is understood that the EPA AirWatch displays air quality information on a 48-hour and 1- hour rolling average.

The Latrobe Valley Air Monitoring Network (LVAMD) comprises a total of 7 monitors located at Rosedale, Jeeralang and Traralgon. The remaining four monitors are operated by the EPA and situated at Morwell south and east, Moe and Churchill (commissioned a part of a response to the Hazelwood Coal Mine fire).

Data from all sites are logged and polled on a daily basis by remote central computer systems. All data is validated before final reporting by the EPA.

Information from these is published periodically online, however the network was criticised to its effectiveness by the Auditor General in their report 'Improving Victoria's Air Quality Audit Report (March 2018).

Latrobe City Council considers that the current system has a number of limitations including:

- Limited number of locations
- Does not capture or report on a number of recognised air pollutants
- information and reports are not real time
- Information reported is not generally presented in a format and text that is accessible to the majority of the community

It is unclear at this point in time as to whether the results of the recent licence review will bring about change to the capture and dissemination of emission data from power generators.

### **Latrobe Valley Information Network (LVIN)**

The Latrobe Valley Information Network (LVIN) was designed and built by Australian engineering company Attentis with support from the Australian Government. The network is considered as a world leading example of real time air monitoring comprising 45 sensors that combine bushfire ignition detection, river and stream level monitoring, air quality tracking and 24-hour microclimate weather conditions to provide early notification of fires, floods and air quality issues.

The project was designed to connect the Latrobe City community with relevant, real-time, local environmental information to create community resilience and awareness of conditions that impact their daily lives. The Latrobe Valley has experienced significant events (Black Saturday, Hazelwood Mine Fire etc) that impacted residents. The LVIN aims to inform all community members, industries and agencies through a greater understanding of local conditions and support mitigation through early detection.



As a result, Latrobe City's 75,000 residents have free access to a real-time, region-wide, air quality network. The network supports a range of needs of the community and industry. For example:

- Allergy sufferers can view live air concentration levels and movement to avoid contact and the impact of airborne pollens and contaminants including smoke from planned burns and the bushfires. The ability to set personalised warnings is also available to residents.
- Farmers throughout the region have access to live and historic rainfall, soil moisture, localised micro climate weather conditions and a range of analytical tools and automation options to optimise water consumption and drive productivity.
- Assist in providing 24 hour monitoring of risk to plantations, coal mines and power stations to protect industry resources in the region, a mitigation step to future proof local industry, reducing the possibility of large scale bushfire events. Further targeted sites include dam wall safety and landfill monitoring.
- Relevant to the inquiry, a range of air pollutants are currently monitored in real time by the system including carbon monoxide, carbon dioxide along with PM1, PM2.5 and PM10.

An example of air quality analytics able to be obtained for large and small town locations across Latrobe City over a 12 month period is provided as attachment to this submission.

The implementation of the network was supported by the Municipal Emergency Management Planning Committee (MEMPC), incorporating representation from Victoria Police, Vic Roads, State Emergency Service, Country Fire Authority, Gippsland Water, Water Catchment Management Authority and local communities.

Community response to recent Ulab Lead Battery Recycling proposal (since approved);

Provided below is an overview of submissions Latrobe City Council received in the assessment of the recent ULAB Battery Recycling application. Also included are the findings from an independent assessment undertaken on behalf of the Latrobe City Council to assist its consideration of the proposed development.

A summary of primary concerns raised by submissions in relation to air pollution included:

- Concerns about the existing levels of air pollution in the Latrobe Valley with reference was made in the majority of submissions to the following an article published in the Latrobe Valley Express on 22 August 2019 - 'Valley tops worldwide rates of air pollution.' :

"The report related to SO<sub>2</sub> emissions and noted that lead and copper smelters emit the most Sulphur pollution in Australia. The proposed Hazelwood North plant, if approved will only further add to this issue."

- Reference was made to the Latrobe Valley community being highly sensitised to the health impacts of air pollution and occupational safety as a result of decades of harm-related open cut brown coal mining and energy generation.
- Reference was made to the physical, mental and social consequences of the 2016 Hazelwood Mine Fire.



- EPAs standards relating to air emission for lead are out of date and were set in 1998. Australia's standards are three times lower than the US Standard.
- Submissions raised concerns regarding EPA Victoria's publication 1518: Recommended Separation Distances for Industrial Residual Air Emissions - Guideline (EPA 2013), in particular the following section: 'It needs to be recognised that where there are industrial air emissions from premises, even which must be anticipated and allowed for. While it is an objective of SEPP (AQM) that such emissions should be eliminated, it is recognised that even 'state of the art' facilities are not always guaranteed to achieve this 100 per cent of the time. Equipment failure, accidents and abnormal weather conditions are among the causes that can lead to emissions affecting sensitive land uses beyond the boundary of the source premises.'
- Concerns were raised about the proximity of the proposal to Hazelwood North Primary School, dwellings and agricultural activities within a 2km radius of the proposed ULAB recycling facility noting the following:
  - People can absorb lead into their bodies by breathing air that contains very fine particles of lead by swallowing contaminated dust, soil, water or food.
  - link between exposure to lead and crime.
  - The effects of early life lead exposure and the associated behavioural consequences can set a lifelong trajectory of similar behaviours which may be expressed in criminal activities in adulthood.
  - possibility of animals (cattle, chickens, sheep etc.), crops and home grown produce being contaminated by lead and other pollutants and the possibility of the transfer of these pollutants to the edible produce.
  - That air pollution from the proposed ULAB recycling facility may decrease the bee population in the area and contaminate honey.
- Importantly submissions raised the fact that EPA currently does not effectively monitor or measure lead levels and other contaminants in the air and concerns were raised about whether power stations are meeting air quality standards in their operating licences or obligations under EPA Regulations.

The Works Approval issued by EPA included maximum emissions for the proposal, requirements in relation to fugitive air emission control systems and a requirement for the design of a continuous and periodical air emission monitoring program to demonstrate compliance with air quality standards, including testing of stack emissions, as well as site boundary, soil and surface water monitoring.

Whilst such measures are appropriate and supported, no requirement for continuous monitoring and 'real time' reporting of information being made publicly available was included. It is considered that the inclusion of such requirements would likely support greater confidence by the community





and ensure greater accountability of operators due to the transparency and dissemination of information.

An independent assessment undertaken on behalf of the Latrobe City Council to assist its consideration of the proposed development. The review provided information about primary and secondary lead smelters in Australia, and examined the site location, proposed buildings, storage, potential emissions, and alternative technologies.

The review provided the following conclusions about the proposal:

In conclusion, environmental compliance of the proposed ULAB recycling facility can be achieved by virtue of:

- The buffer distance between the proposed facility and sensitive receptors is well in excess of that required and that recommended by EPA.
- All processing occurring within a fully enclosed building that is maintained under a negative atmospheric pressure.
- The relatively few similarities between primary lead smelting and the more sophisticated process involving secondary lead smelting outlined by the proponent.
- The highly automated emissions management systems, each with designed redundancy.
- These features provide a sound foundation for achieving a high standard of environmental performance. Should they be absent then we would not be making such a conclusion.
- The large margin of safety between the maximum predicted ground level concentrations and the maximum allowed ground level concentrations.
- The offer from the proponent to make available live and on-line emissions monitoring data.
- The regulatory powers available to the EPA and council.
- The soon to become available rights of affected individuals to commence their own court actions in the event of alleged environmental breaches.

Based on the above conclusions, it was considered that the proposal would achieve a high standard of environmental performance with emissions from the use would be able to be contained and treated within the enclosed confines of the plant building through the use of dedicated air pollution control equipment.

## **CONCLUSION**

Latrobe City Council is supportive of the current inquiry and well positioned to support future research and interventions relating to air pollution due to its current impact on the health of our community.



**ATTACHMENT**

Attentis – Latrobe Valley Information Network Annual Air Quality Report March 2021



## Latrobe Valley Information Network Air Quality Report 2020-21

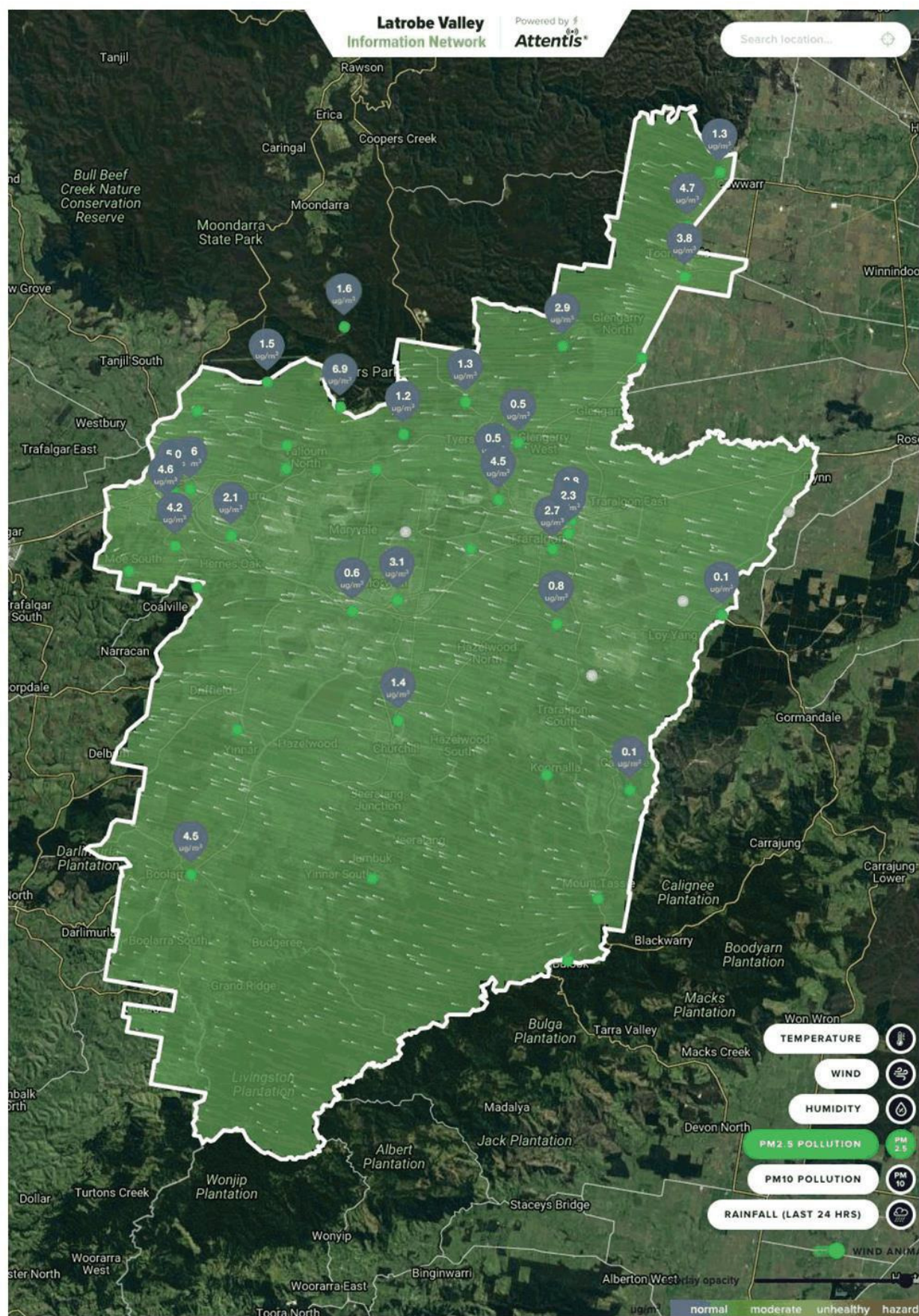
Real-time air quality, micro and macro climate weather, bushfire and flood detection, public health and community resilience in a single network.

March 2021

**STRICTLY COMMERCIAL IN CONFIDENCE**

The enclosed contents can only be disclosed to a third party with the express written approval of Attentis® Pty Ltd.









## The Latrobe Valley Information Network

A region wide real-time air quality network everyone can access, everyday.

The Latrobe Valley Information Network (LVIN) was constructed in the wake of the Hazelwood Mine Fire disaster that impacted the quality of air throughout the Latrobe Valley.

The LVIN network was designed and constructed to deliver and enhance the recommendations of the of Hazelwood Mine Fire Inquiry, notably;

### RECOMMENDATION 5

The State equip itself to **undertake rapid air quality monitoring in any location in Victoria, to: collect all relevant data, including data on PM2.5, carbon monoxide and ozone; and ensure this data is used to inform decision-making within 24 hours of the incident occurring.**

### RECOMMENDATION 9

The State develop and widely **disseminate an integrated State Smoke Guide**, to: incorporate the proposed State Smoke Plan for the **management of public health impacts from large scale, extended smoke events; include updated Bushfire Smoke, carbon monoxide and PM2.5 protocols; and provide practical advice and support materials to employers, communities and individuals on how to minimise the harmful effects of smoke.**

### RECOMMENDATION 11

The State review and revise its communication strategy, to: ensure all emergency response agencies have, or have access to, the capability and resources needed for effective and **rapid public communications during an emergency;** and ensure, where appropriate, **that private operators of essential infrastructure are included in the coordination of public communications during an emergency concerning that infrastructure.**

Key deliverables from the LVIN network that deliver these recommendations are:

The LVIN provides access to real-time 24-hour, air quality monitoring for PM1, PM2.5, PM10, carbon dioxide, carbon monoxide and ozone throughout the region. All residents, emergency service agencies, businesses, local government and major infrastructure providers have access to view live conditions and air movement throughout the region to effect immediate response, notification and mitigation measures to reduce impact on communities and key operational assets.

During the East Gippsland fires, the LVIN was accessed by over 11,000 individuals and organisations to view high concentration hot spots and air movement to limit exposure and impact from the smoke from these fires.

This technology would have reduced the number of deaths and respiratory impacts on residents statewide had the LVIN technology been applied to other regions throughout Victoria.

The following pages detail the fine scale continuous recording of air quality conditions at all major towns throughout the Latrobe City Council footprint, the focus of the LVIN.

The towns include:

- Boolarra
- Churchill
- Moe
- Morwell
- Newborough
- Toongabbie
- Traralgon
- Tyres.

All minimums and maximums are recorded to maintain a clear understanding of air quality conditions experienced at each town throughout the 12 month period.

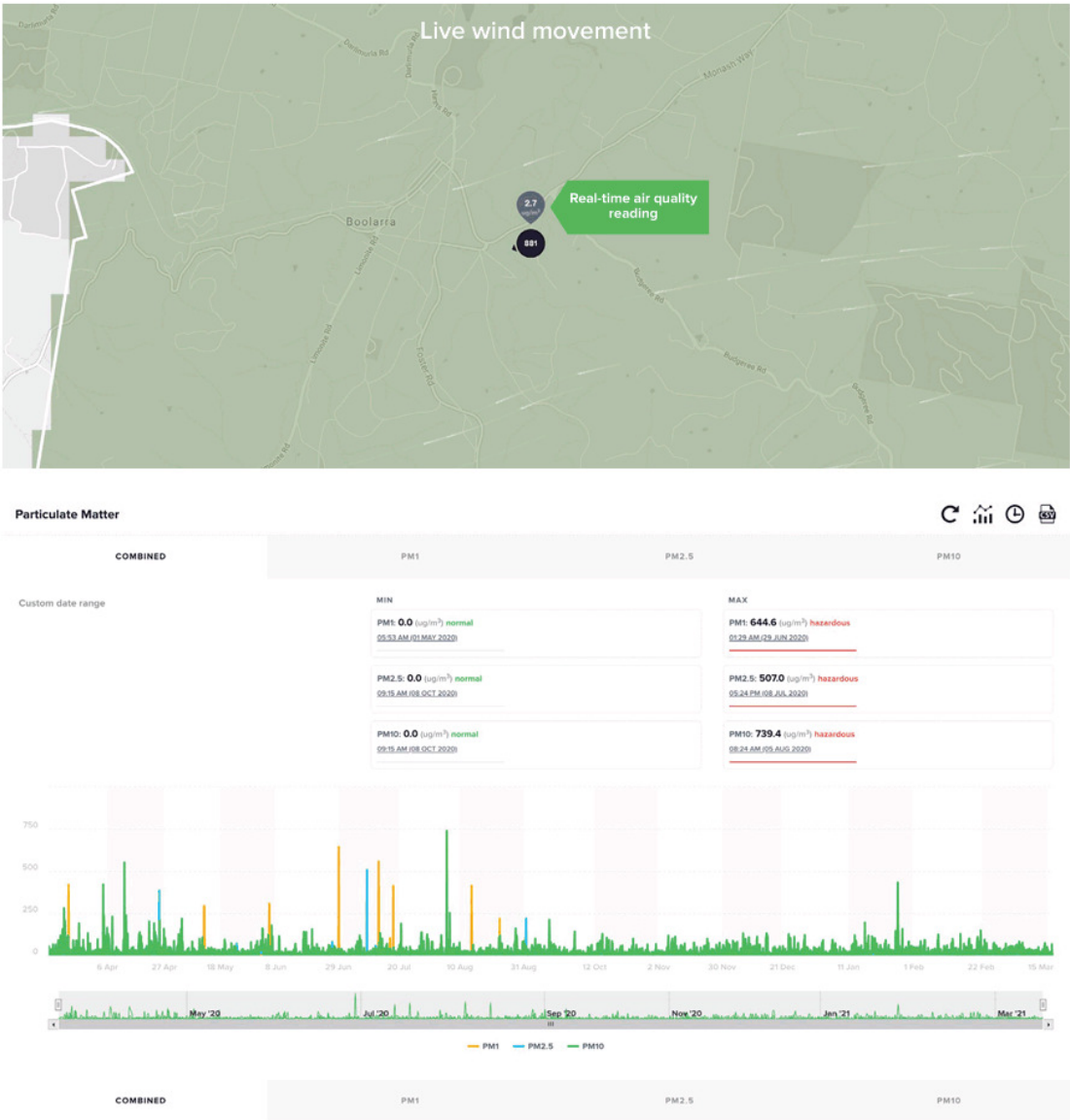
As detailed in each location, minimum and maximum readings show the lowest and highest reading at a specific time, on a specific day.

All live conditions are available on our LVIN App.





Site location: **Boolarra**  
Sensor #: **881**

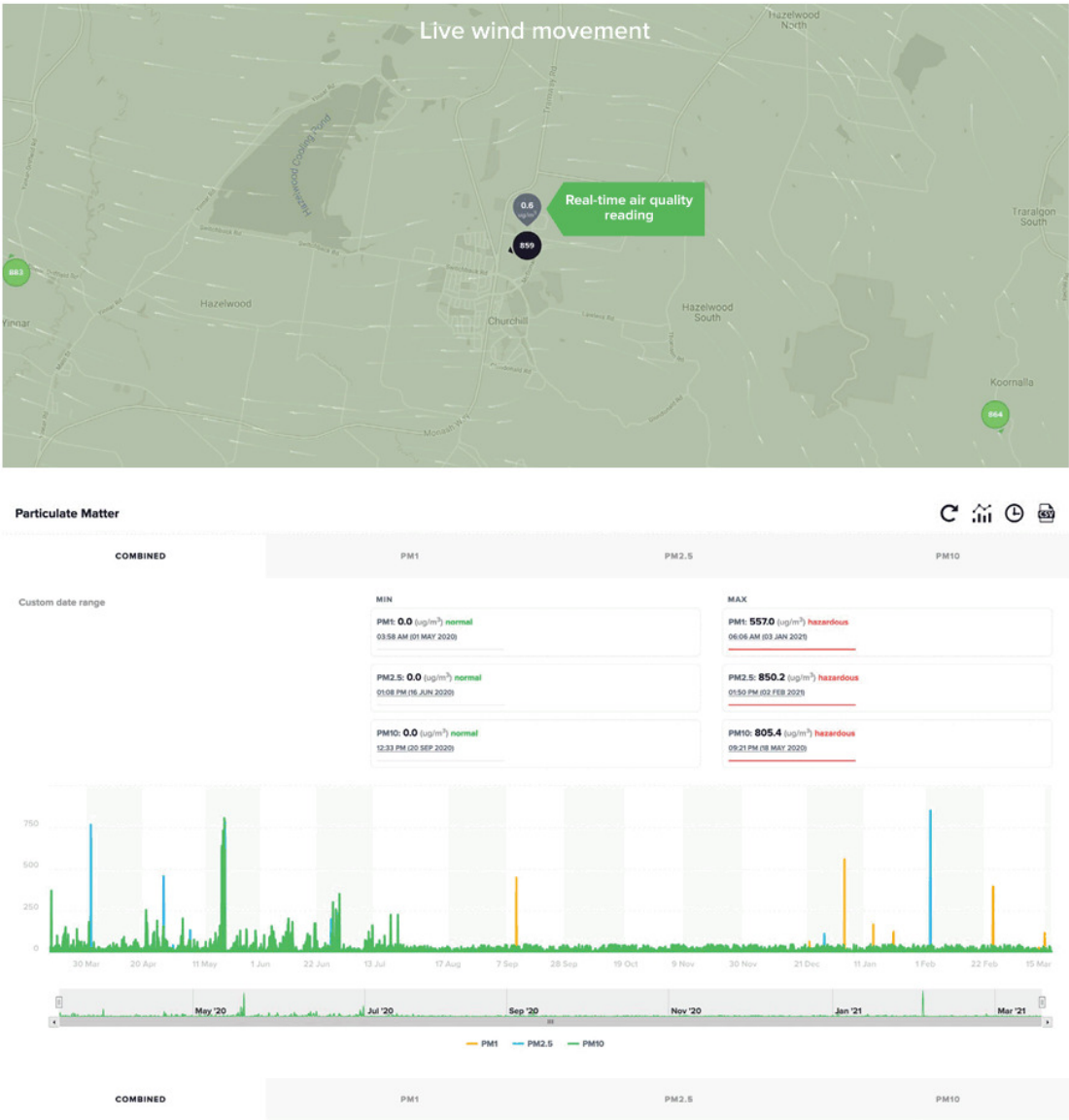


This graph details the PM<sub>1</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Boolarra through the 12 month period - March 2020 - March 2021.





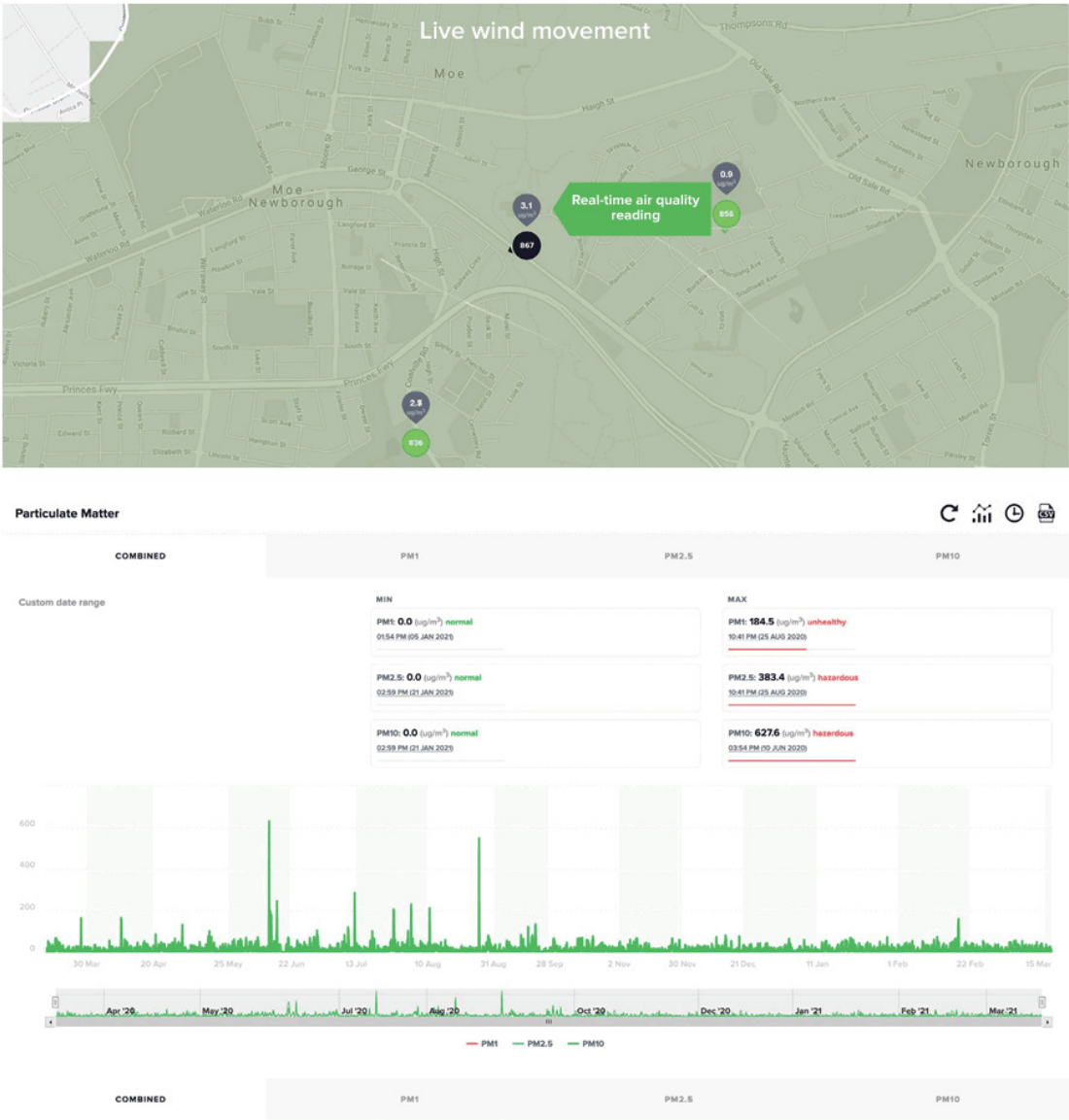
Site location: **Churchill**  
Sensor #: **859**



This graph details the PM<sub>1</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Churchill through the 12 month period - March 2020 - March 2021.



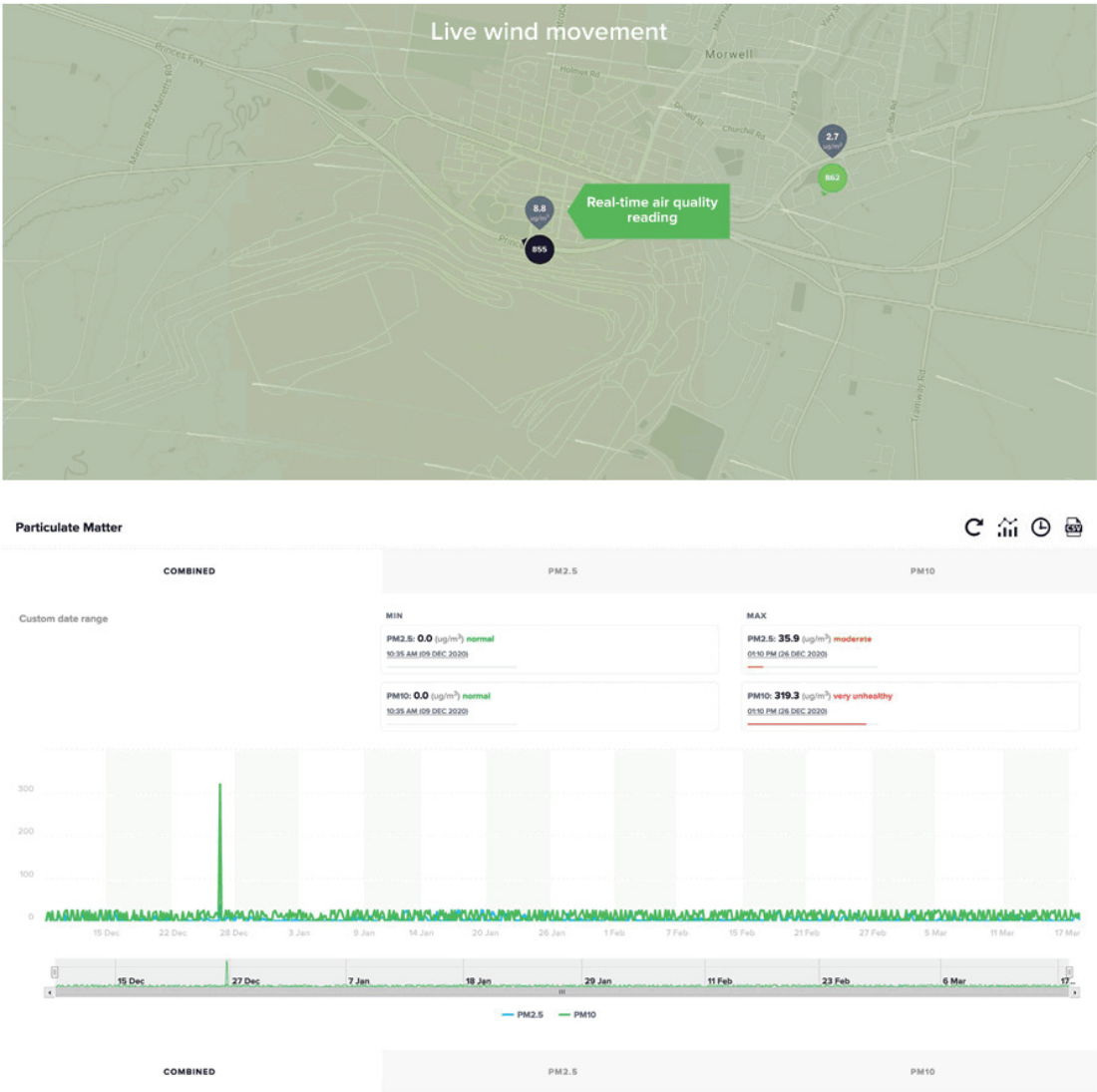
Site location: **Moe**  
Sensor #: **867**



This graph details the PM<sub>1</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Moe through the 12 month period - March 2020 - March 2021.



Site location: **Morwell**  
Sensor #: **855**

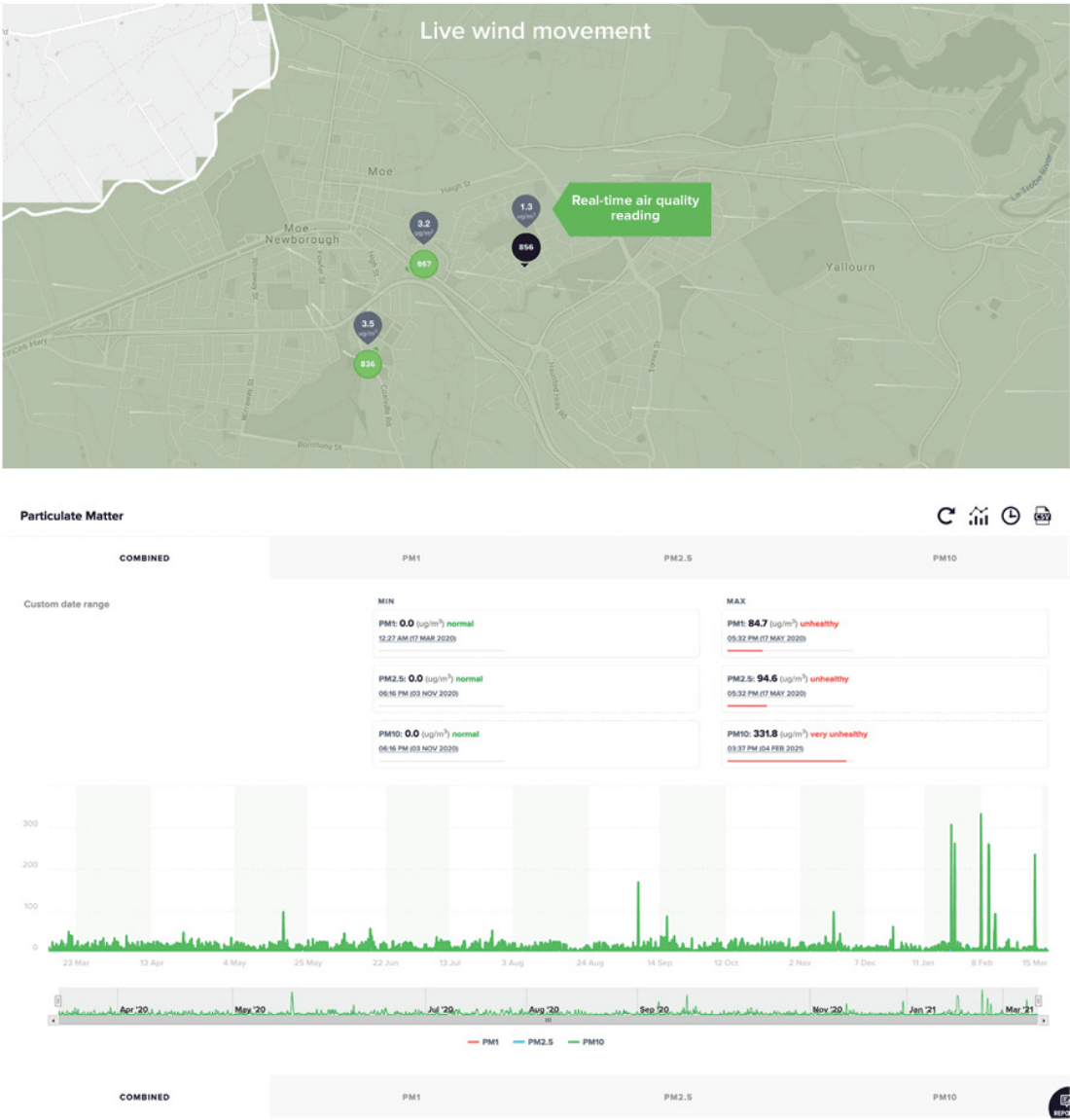


This graph details the PM<sub>10</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Morwell through the 12 month period - March 2020 - March 2021.



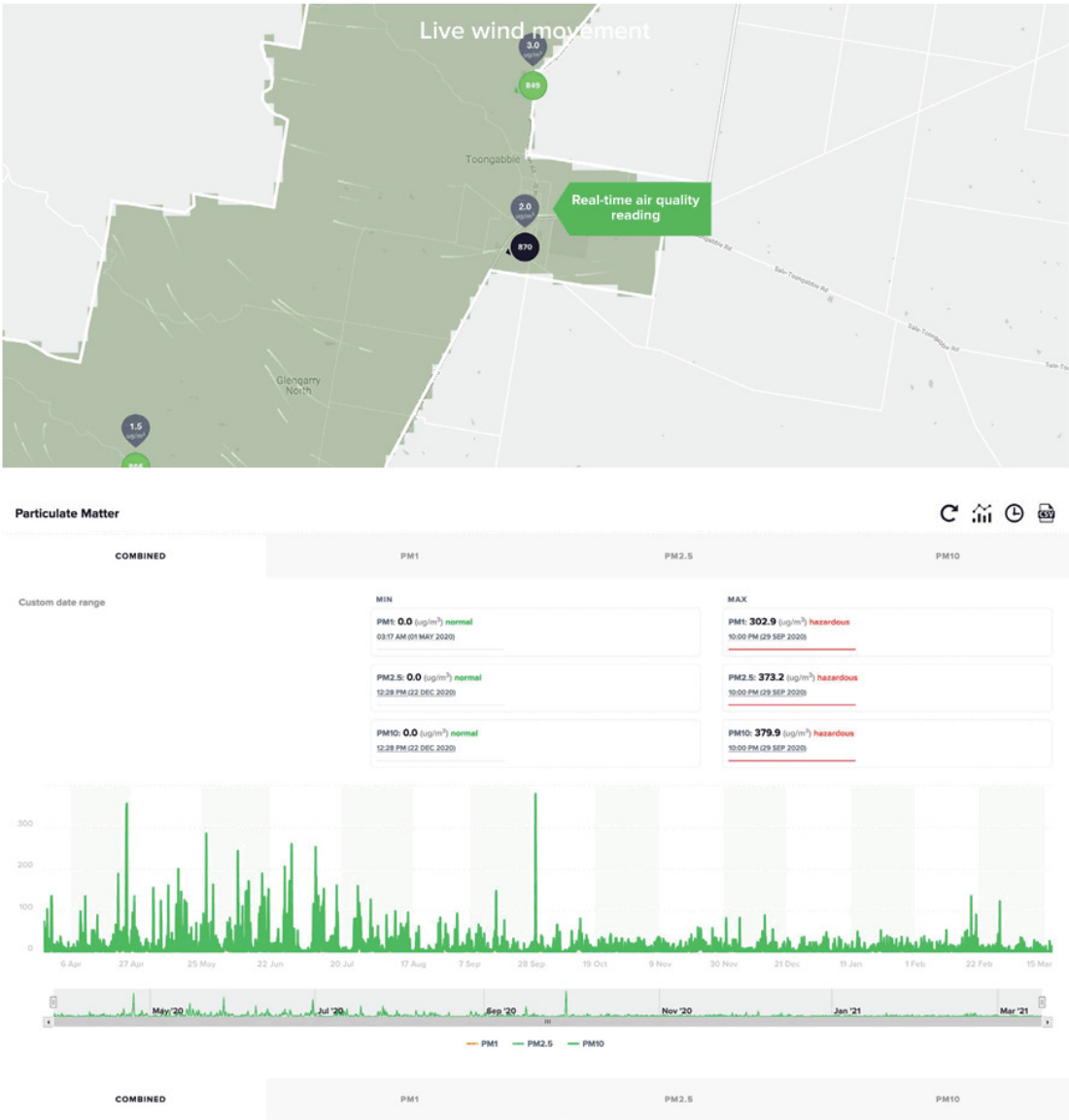


Site location: **Newborough**  
Sensor #: **856**



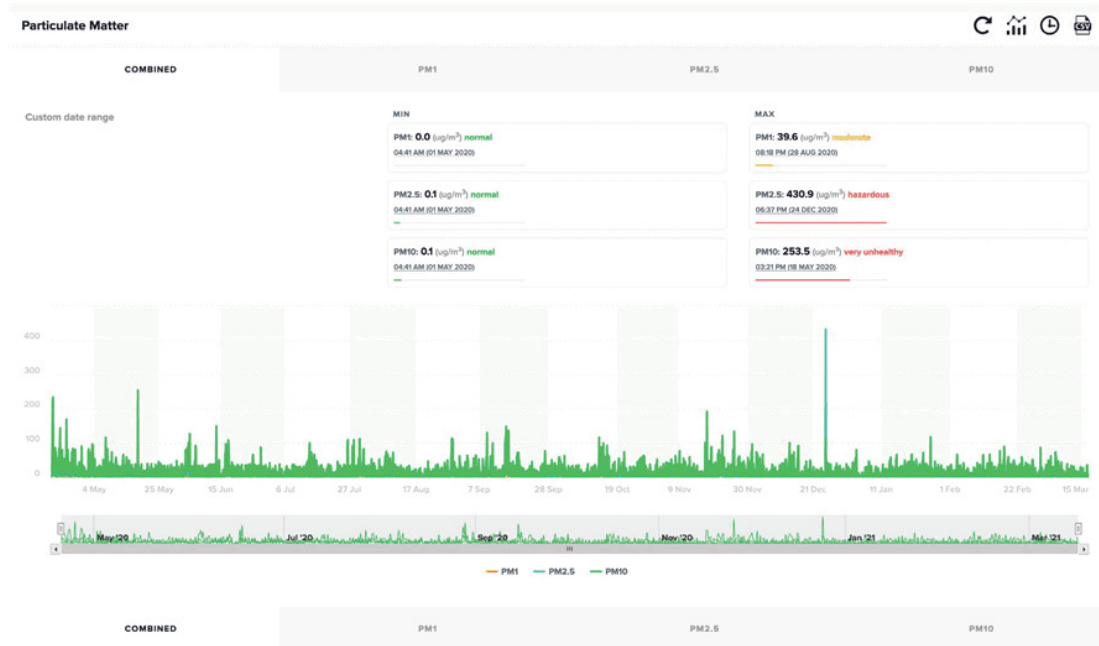
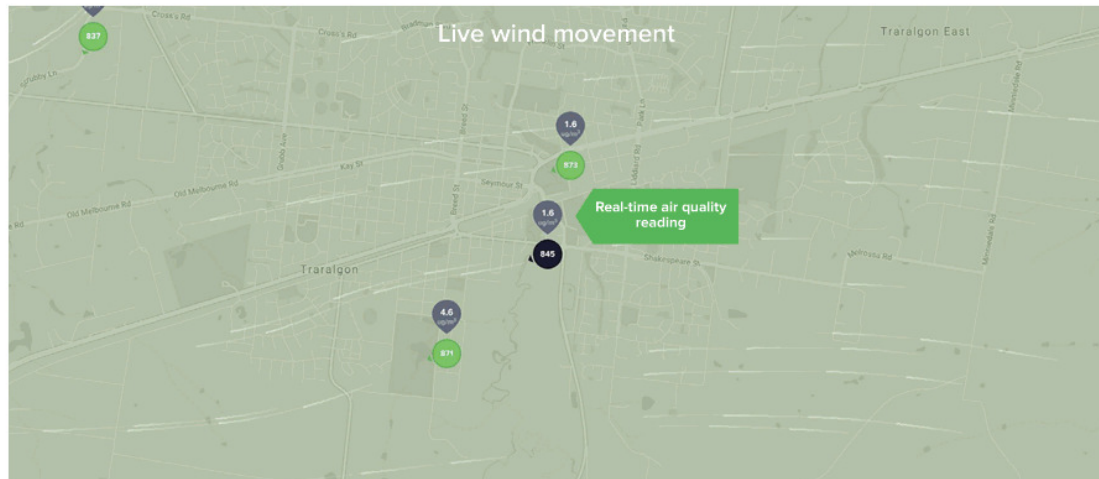


Site location: **Toongabbie**  
Sensor #: **870**



This graph details the PM<sub>1</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Toongabbie through the 12 month period - March 2020 - March 2021.

Site location: **Traralgon**  
Sensor #: **845**

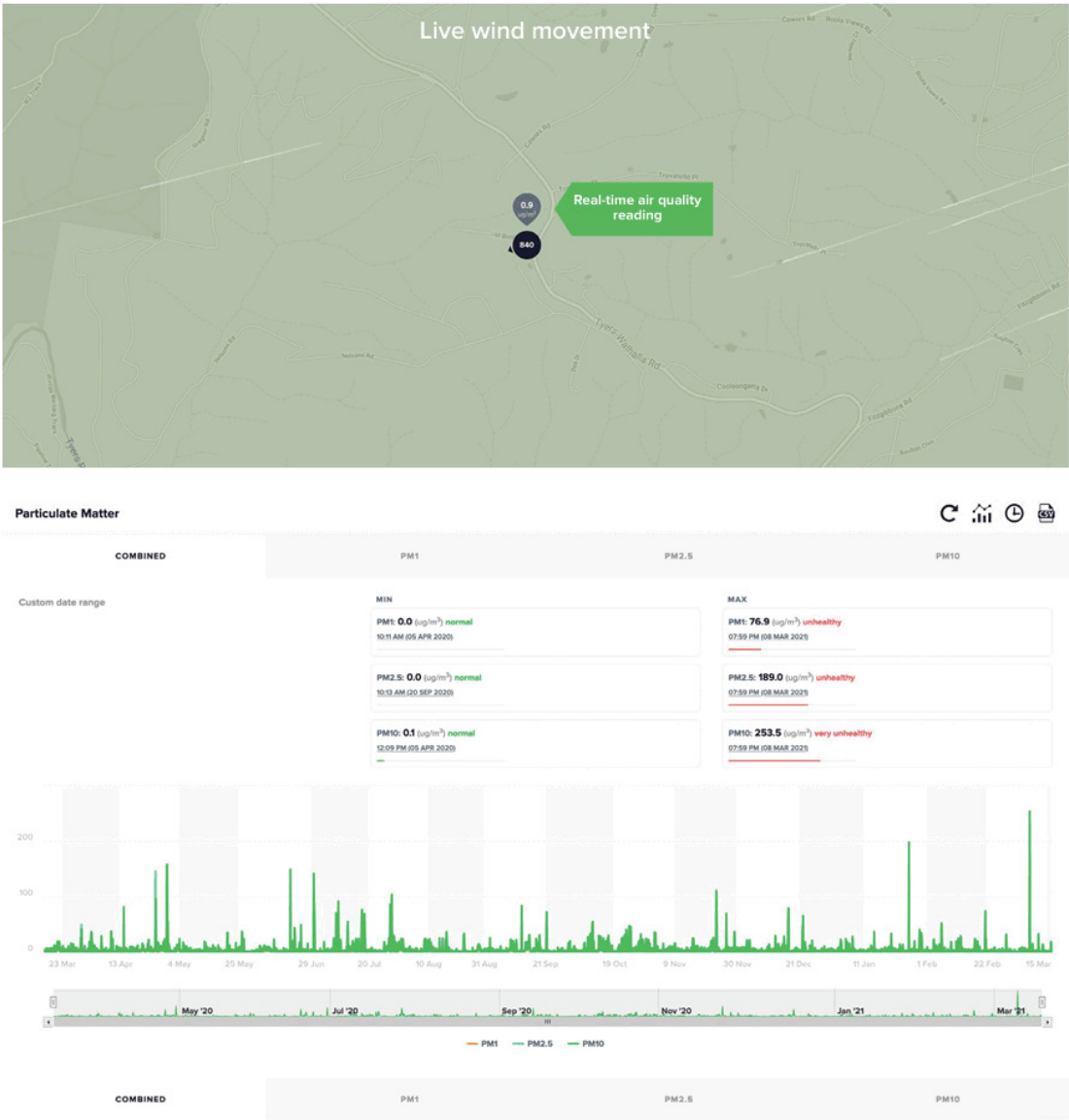


This graph details the PM<sub>1</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Traralgon through the 12 month period - March 2020 - March 2021.





Site location: **Tyres**  
Sensor #: **840**



This graph details the PM<sub>1</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> readings from the town of Tyres through the 12 month period - March 2020 - March 2021.



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