

28 January 2022

Phil De Losa
Governance Manager
City of Kingston
PO Box 1000
Mentone VIC 3194

By email: governance@kingston.vic.gov.au
info@kingston.vic.gov.au

Dear Mr De Losa,

Re: Proposed Community (Miscellaneous Amendments) Local Law 2021 – Part 9 Fire

Thank you for the opportunity to participate in City of Kingston's consultation around the proposed amendments to the Community Local Law.

Asthma Australia is the peak body for people with asthma. Asthma is a life-long chronic condition of the airways which affects 11.2% of people in Greater Melbourne. People with asthma experience inflammation in the airways in response to triggers. These triggers cause the airways to narrow, resulting in breathing difficulties and, in some cases, medical emergencies and even death.

Asthma Australia does not support the proposed amendment to **Part 9 – Fire** of the *Proposed Community (Miscellaneous Amendments) Local Law 2021*. This amendment would remove the prohibition on lighting fires in an outdoor manufactured fireplace, such as a fire pit, on private property.

Asthma Australia urges City of Kingston to retain the current prohibition on backyard fires to protect the health of local residents. Allowing people to light fires in backyards would have serious consequences for people with asthma as exposure to smoke can trigger asthma symptoms and result in life-threatening asthma exacerbations.

Like smoke from bushfires, smoke produced by wood burned in fire pits contains fine particulate matter or PM2.5. Research shows that PM2.5 is an asthma trigger and it is particularly harmful to people with asthma and other respiratory conditions, as well as pregnant people, young children and infants, older people and people with cardiovascular disease and type 2 diabetes.ⁱ

There is no safe level of exposure to particulate matter, meaning that smoke from a single backyard fire pit that travels through a neighbourhood could cause harm for many residents. We know that woodburning heaters in urban areas contribute significantly to particulate matter pollution, with research in the Greater Metropolitan Region of Sydney showing indoor woodfire heaters are the most important source of fine particulate matter or PM2.5.ⁱⁱ Research in Tasmania showed that woodfire heater smoke was responsible for more premature deaths than bushfire smoke.ⁱⁱⁱ

Brisbane City Council introduced an additional source of air pollution with its fire pit and brazier trial in 2020 and has since made this change permanent. Asthma Australia opposed the introduction of fire pits in Brisbane and we were disappointed to see Brisbane City Council ignore the weight of

public submissions made during a public consultation which opposed permanently allowing the use of fire pits. Since fire pits were permitted in Brisbane, Asthma Australia has been contacted by numerous people who have experienced increased asthma symptoms and asthma exacerbations because of smoke from neighbours' fires. For example, a Brisbane resident told us:

"The smoke from the backyard fires that has occurred since this trial started is having a significant impact on my family and many other residents in the community, in particular children, the elderly and those with asthma, respiratory illness and cardiovascular illness. Increasing the amount of smoke pollution in Brisbane also increases the vulnerability of those with or at risk of COVID-19."

We expect that people living in the Kingston Local Government Area would experience similar health issues should your Council proceed to allow wood burning fires in backyards.

A representative survey of over 25,000 people commissioned by Asthma Australia in 2020 found most people support the introduction of regulations to reduce the impact of woodfire heaters.^{iv} There is widespread community understanding of that woodsmoke is harmful to human health, with three-quarters of the population agreeing that woodfire heaters can cause health problems for certain people. There is also widespread support for regulations to reduce the adverse impacts of woodfire heaters, with more than three-quarters of the general population agreeing woodfire heaters should not be allowed in urban or built-up areas and over half agreeing they should be phased out or banned.

While woodfire heaters can be a necessity to heat households which can't afford to replace them with alternative heating methods, backyard fire pits serve no purpose other than the enjoyment of those using them.

In addition to the health consequences of smoke from backyard fires, Asthma Australia is concerned that allowing the use of fire pits would introduce new safety risks. For example, there is the risk of burn injuries, particularly for children, the risk of fire spreading to homes and other assets, and bushfire risk.

We draw your attention to the objectives contained in City of Kingston's *Community (Miscellaneous Amendment) Local Law 2021* and argue that allowing the use of backyard fire pits is inconsistent with the following 3 (of 4) objectives:

- (2) *make improvements to provide for a safe and healthy environment so that the community can enjoy a quality of life that meets its expectations;*
- (3) *provide for improvements for the protection and enhancement of the amenity and environment of the municipality; and*
- (4) *provide for the peace, order and good government of the municipal district.*

In setting these objectives, City of Kingston clearly understood the importance of human health, quality of life, a healthy environment and public safety. We commend your Council for recognising these values.

Asthma Australia therefore asks City of Kingston to retain the current local law which prohibits the use of backyard fire pits and in so doing, places the health, wellbeing and safety of many members of your community ahead of the desire of some to use fire pits. If you would like more information, please contact Asthma Australia's Policy and Advocacy Manager, Angela Cartwright: acartwright@asthma.org.au / 0421 197 555.

Yours sincerely,



Kathy Packenas
Acting CEO, Asthma Australia

ⁱ Arriagada N., Palmer A., Bowman D., Morgan G., Jalaludin B., and Johnston F., 'Unprecedented smoke-related health burden associated with the 2019-2020 bushfires in eastern Australia' (Medical Journal of Australia) 12 March 2020.

ⁱⁱ Broome, R.A. et al (2020) The mortality effect of PM2.5 sources in the Greater Metropolitan Region of Sydney, Australia, Environment International, Vol 137.

ⁱⁱⁱ Borchers-Arriagada, N. et al (2020) Health Impacts of Ambient Biomass Smoke in Tasmania, Australia. Int. J. Environ. Res. Public Health, 17, 3264.

^{iv} Asthma Australia (2021) Woodfire Heaters and Health Survey Key Findings Report, available online: <https://asthma.org.au/wp-content/uploads/2021/03/Asthma-Australia-Woodfire-Heaters-and-Health-Survey-Report.pdf>