



## **Submission on the Brisbane City Council proposed Health, Safety and Amenity Local Law 2021 for the City of Brisbane**

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Thank you for the opportunity to comment on the proposed Health, Safety and Amenity Local Law 2021 for the City of Brisbane.

### **About the Centre for Air pollution, energy and health Research (CAR)**

[CAR](#) is a Centre of Research Excellence funded by the National Health and Medical Research Council. The centre brings together more than 30 researchers at the forefront of their fields, based in seven of Australia's leading universities. CAR is the only group of its kind nationally to bring together researchers focusing on health impacts of air pollution, and new versus traditional forms of energy. Our centre's vision for a healthier community is the driving force behind our research. CAR researchers and affiliates have been involved in numerous publications relating to the health impacts of air pollution in Australia. For example, this year CAR researchers published an assessment of the health-related impacts of long-term exposure to human-made particulate matter (PM), and found impacts cost the Australian economy an estimated AUD\$6.2 billion annually (Hanigan et al 2021).

### **Comments**

We oppose the proposed laws around permissions for fire pits and braziers, as articulated in *Chapter 1, Part 2, Section 6. Regulation of lighting and maintaining fires in the open*. Our opposition to the proposed laws is on health grounds.

The proposed rules state that a person may light and maintain a fire within a fire pit or brazier as long as "smoke from the fire pit or brazier does not cause a smoke impact" (Chapter 1, Part 2, Section 6, clause (d)). By their very design, a fire pit or brazier will release smoke into the air, impacting local air quality. Fires made using (clean, dry, seasoned) wood or charcoal will produce smoke. Smoke comprises harmful elements such as particulate matter.

Recent scientific evidence concludes that adverse health effects resulting from particulate matter exposure occur even at low levels (Hanigan et al 2019). As such, there is no safe level of smoke exposure in terms of human health. Health effects from poor air quality include death

from and exacerbations of many diseases; cardiovascular disease, respiratory disease, metabolic disease and neurological disease (Landrigan et al 2018).

While minimal research has been conducted on the air quality impacts of fire pits and braziers, recent evidence on wood smoke from heaters suggests the smoke-related health impacts could be substantial. For example, one study in Tasmania concluded that particulate matter from wood heater smoke was responsible for approximately 69 deaths, 86 hospital admissions, and 15 asthma emergency department visits *every year*, with associated annual costs of AUD\$293 million (Borchers-Arriagada et al 2020).

Beyond smoke impacts, we hold concerns about the regulation of fire pits and braziers in Brisbane. Reliance on self-compliance in conjunction with the existing community complaints mechanism is unlikely to successfully minimise smoke nuisance or smoke-related health impacts in a timely manner. We also hold concerns that a 2.5 metre clearance rule between the fire pit/brazier and flammable materials is insufficient to minimise risks associated with general fire danger.

We urge the Brisbane City Council to reconsider proposed laws permitting fires maintained in fire pits and braziers in the City of Brisbane.

## References

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## For more information

This submission has been produced by the Centre for Air pollution, energy and health Research (CAR).



For more information about CAR and our work in the health impacts of air pollution: contact us at [car@sydney.edu.au](mailto:car@sydney.edu.au) or visit our website: [www.car-cre.org.au](http://www.car-cre.org.au)