

July 23, 2021

**Re: Response to HPBA presentations to local governments**

Dear Comox Valley Mayors, Councillors and Regional Directors;

The Hearth, Patio and Barbeque Association (HPBA) recently completed presentations to each of the four local governments in the Comox Valley. We are writing to request that our local governments do not make any commitments, or indications of support, for industry's proposals while the Roundtable process is underway. To do so, without hearing from other members of the Roundtable, undermines this collaborative process. We have also attached some thoughts about their specific proposals.

As you know, an Airshed Roundtable has been set up in the Comox Valley to help develop a strategy to improve our air quality. There is a diversity of groups and interests at the table, including local and provincial government staff, members of the public, community organizations, a local wood stove retailer and the national HPBA.

You might not be aware that draft goals have been collectively identified by the Roundtable and three working groups are currently developing approaches for achieving the following:<sup>1</sup>

1. Eliminate burning of yard waste in residential neighbourhoods and promote and advocate for alternatives to open burning outside of residential neighbourhoods;
2. Reduce emissions from existing residential wood-burning appliances; and
3. Transition away from biomass heating systems in populated areas.

The focus of these working groups arises out of the expressed interest of many Roundtable members.

**HPBA Proposal conflicts with Roundtable's draft goal**

Two of the HPBA's proposals promote notable investment in wood burning infrastructure: a wood lot costing "hundreds of thousands of dollars"; and the installation of new stoves that will be around for at a *minimum* of 20 years (and which are known to degrade with time so their emissions will increase).

Unlike establishing non-smoking sections in restaurants, adopting these approaches will reflect a long-term commitment to continued wood burning *in* our communities. Additionally, investors are asking for assurances governments will not send any signals that might deter continued wood heating. If implemented, the wood lot and rebates for wood stoves proposals would constrain the use of strategies the Roundtable is discussing to transition people to non-biomass forms of heating. They will also result in a continued, long-term onus on governments to ensure education, monitoring and enforcement related to burning practices.

A different approach, one consistent with the Roundtable's draft goal and current discussions, would be to focus on strategies and messages that will encourage a transition away from wood heating in

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<sup>1</sup> See page 46 of May 17, 2021 staff report to CVRD.

[http://agendaminutes.comoxvalleyrd.ca/Agenda\\_minutes/CVRDBoard/BRD/25-May-21/Dyson%20SR%20Airshed%20Roundtable%20Year%201%20Update.pdf](http://agendaminutes.comoxvalleyrd.ca/Agenda_minutes/CVRDBoard/BRD/25-May-21/Dyson%20SR%20Airshed%20Roundtable%20Year%201%20Update.pdf)

populated areas in particular (different strategies are likely needed for rural areas where wood burning has less of an impact on neighbours and communities and these strategies are also being discussed at the Roundtable).

Each home that transitions to another form of heat is *guaranteed* to result in a significant and permanent reduction in pollution. Not only does this protect the health of neighbours, if the home moves to electric forms of heat, there will be a very significant drop in the amount of Greenhouse Gases and Black Carbon released. And it will also reduce the burden of continued education, monitoring and enforcement related to burning practices (a cost born by all taxpayers) as no other form of home heating requires this ongoing public investment.

### **Looking forward**

Breathe Clean Air is a group of local citizens whose sole motivation for volunteering hundreds of hours (and dollars) to this work is to try and clean up our air in order to protect our health and the health of our communities. As part of this, we have worked collaboratively with governments, Island Health, and other organizations to ensure the information we share is both *accurate* and *respectful*. Although our resources are very limited, in the last five years we have been instrumental in helping to raise awareness of the impacts of wood smoke. We have also shared available research and promoted constructive ideas for cleaning up our air.

We know the solutions are complex and that we must ensure vulnerable populations in particular are supported in switching to cleaner options; but we also are concerned that many vulnerable populations such as seniors, children and people with existing health issues are being harmed by wood smoke every winter. We want to see meaningful change soon, for the sake of everyone's health.

The Roundtable is part of this work towards change. Admittedly, we have been frustrated with the delay in meaningful action, but we continue to work with others to try and move things forward. We are concerned, however, that for many months the national HPBA has been investing significant resources outside of this collaborative process to try and get elected leaders to take steps that could erode some of the progress that has been made to date on improving our air quality (such as the removal of wood stove rebates from the CVRD program and the passing of the 'no new installation' bylaws) and that will impact the Roundtable's work.

We have attached our specific thoughts on HPBA's "three pillars" as food for thought; however, at this time we are writing to ask that our local governments do not make any commitments—or indications of support—for industry's proposals while the Roundtable process is underway. To do so, especially in absence of discussion with other members of the Roundtable, undermines the work of many who are investing their time and energy participating in the Roundtable process.

Please let us know if you have any comments or questions.

Sincerely,

Jennell Ellis  
For Breathe Clean Air Comox Valley

## Response to the HPBA proposals

In their presentations, the HPBA proposed a three pillar approach which we respond to below as food for thought.

### **1. Create a Sustainable, Dry and Seasoned Wood Supply**

Breathe Clean Air recognizes short-term initiatives aimed at getting people who currently burn wood to use dry, seasoned wood, would be beneficial and, if industry feels establishing a new woodlot business is economically viable, and *if they fully fund it*, that is their prerogative of course.

However, we are very concerned by HPBA's messages that their investment is likely contingent on the removal of the 'no new installation' bylaws as they feel these bylaws send regulatory "signals" that are incompatible with investment. We are also concerned they will continue to use this investment to oppose any programs or regulations aimed at transitioning people to non-wood burning forms of heat or reducing wood burning as those too might send the wrong 'signal' according to HPBA.

HPBA's says its motivation to invest in a wood lot is to help improve air quality. It is puzzling that they have never established a wood lot in any other area, many of which have been addressing wood smoke issues for many more years (they also do not participate in any other airshed roundtable in BC). The only difference between the Comox Valley and many other areas dealing with the same issues is that we now have 'no new installation' bylaws here which HPBA Canada and US strongly oppose.

We ask that local governments ensure they do not actively facilitate investment in a wood lot as it may be used to oppose both current and future clean air initiatives.

On a practical level, it is impossible to know how many will use the wood lot and if it would make a difference. People who currently get their own wood to save money will not likely start purchasing wood. Would people who currently burn wet or unseasoned wood (or other materials) be willing to pay for this wood (including taxes) and would they store it properly? Those who stack and season their wood now are not really in need of a wood lot. So the question is, will an investment of "hundreds of thousands of dollars" likely have a measurable result?

### **2. Targeted wood stove exchange program**

It makes sense that an industry that manufactures and sells wood stoves is interested in securing public funding for rebates aimed at helping people buy new wood stoves. (Similarly, they support regulations that require old stoves to be removed, as long as they can be replaced with newer ones).

A couple of years ago, the CVRD's "Wood Smoke Reduction Program" stopped providing rebates for log burning appliances; it would be a step backwards to reinstitute rebates for new wood stoves. CVRD in part recognized that it was not an appropriate use of public funding to encourage minimal or uncertain improvements; resources should be directed instead to rebates that will achieve substantive, guaranteed changes. For example, BC provides rebates for cars that make a notable difference to climate change and people's behaviours; they don't provide incentives for cars with internal combustion engines that get somewhat better mileage.

Additionally, claims about the degree of improvement when changing from an old stove to a new one has been brought into question by the recent NESCAUM report that stated “...the existing [EPA] program provides no confidence that new residential wood heaters are performing in a manner that better protects public health than the heaters they replace.”<sup>2</sup>

Although HPBA dismisses this report from state agencies, two months after its release Attorney Generals from nine states wrote to EPA to ask that it revoke some of the allowable alternative test methods for wood stoves. 60% of the “certified” stoves approved by EPA used these test methods.<sup>3</sup>

Breathe Clean Air’s position on replacing old stoves with new ones, particularly in populated areas is clear: we do not support taxpayer’s dollars going towards paying for new stoves. The actual reduction in PM2.5 is very uncertain and there are no guarantees it will be used well<sup>4</sup> and, even if it is, neighbours of wood stoves will be exposed to far more pollution than any other form of home heating.

Even John Crouch from the US HPBA acknowledged the uncertainty of actual emissions: “This is fire. Fire is pretty random. And these are in the laboratory. You can imagine when you get out into the real world. It varies a lot.”<sup>5</sup> Additionally, the \$2.5 million exchange program in Libby, Montana is often showcased by the HPBA as an example of a very successful initiative. While the program did result in a reduction in PM2.5, *if Libby was in BC it would still fail every year—by far—to meet our air quality objectives.*<sup>6</sup>

Cleaner forms of heat are also more affordable to operate than wood stoves (for those who buy their wood); the barrier to change is often the cost of installation. Like many other members of the Roundtable, we fully support investments in rebates or loan programs that help people, particularly lower-income families, transition to cleaner, healthier heat that is more affordable to run.

### 3. Public Education and Training programs

Breathe Clean Air does not have an issue with industry undertaking additional ‘better burning’ type education. CVRD’s Wood Smoke Reduction Program, like every other similar program in BC, has been doing such education for a number of years (with unknown impact). The CVRD program has increasingly focused on educating people about the health impacts of wood smoke as a way to help motivate change, whether by burning better or by moving away from wood heat

<sup>2</sup> See “[Assessment of EPA’s Residential Wood Heater Certification Program: Test Report Review: Stoves & Central Heaters](#)”

<sup>3</sup>

<http://www.forgreenheat.org/upload/upload/AG%20let%20to%20EPA%20on%20ASTM,%20May%202021.pdf>

<sup>4</sup> From a neighbour of someone who received a wood stove rebate in Cowichan: *Of the nine wood stoves that have cropped up in my area, the worst by far is the one next door, which belongs to a North Cowichan Wood Stove Exchange recipient. This neighbour’s volume of smoke doubled and I thought he was having a chimney fire, when he relayed to me the good news that he had a brand new stove courtesy of North Cowichan!*

<sup>5</sup> [https://www.theguardian.com/environment/2021/mar/16/wood-smoke-alaska-state-regulators-air-quality?fbclid=IwAR16kmq\\_Mnk61bdFetIxzmqF95h2tU5WSZva3WtR-DiwhL-oljsgt8ZnaSA](https://www.theguardian.com/environment/2021/mar/16/wood-smoke-alaska-state-regulators-air-quality?fbclid=IwAR16kmq_Mnk61bdFetIxzmqF95h2tU5WSZva3WtR-DiwhL-oljsgt8ZnaSA)

<sup>6</sup> See <https://breathecleanair.ca/how-successful-was-libby-wood-stove-exchange/>

completely. HPBA did not mention health education at all in its presentations but it is important to any outreach campaign.

One issue with 'better burning' education is that it encourages people to believe that wood burning can be 'clean', as if no visible smoke, means no pollution. But less visible emissions still contain harmful fine and ultra fine particles as well as many other carcinogens and toxins. There is also little evidence available that shows these programs make a difference in people's burning practices, particularly over the long-term. One CVRD employee told us in the past that the people who tend to show up at the workshops are the ones that want to talk about how well they already burn.

But if industry wants to invest its own resources and take full responsibility for teaching people how to actually use the appliances they manufacture and sell, we have no issue with that.