



Public Consultation on Solid Fuels,
Air Quality Division,
Department of the Environment, Climate and Communications,
Newtown Road,
Wexford.
Y35 AP90

23rd February 2021

Ref: Consultation on the Development of a new Solid Fuel Regulation for Ireland

A Chara,

The consultation paper tells us that the Programme for Government commits to moving towards a full nationwide ban on the burning of bituminous coal, peat and wet wood, so that the environmental and health benefits that have already been brought to our cities and towns can reach every part of our country.

This approach is a misguided attempt to fit a square peg in a round hole. How on earth could a limit needed to reduce excessive particulate levels in a suburban environment apply to rural areas with a sparsely dispersed population living on farms and smallholdings, other than to constrain their ability to use local fuels supplemented by bituminous coal when the fire needs to be boosted?

Q1. *Are you in favour of a national regulation on solid fuels, and if so, why?*

A1. No - it should be graduated by location based on a logical and scientifically based risk assessed weighting determined by population density.

Q2. *What solid fuels should be subject to regulation and why?*

A2. If any fuels are to be regulated, they should **all** be regulated as per answer A#1 above.

Q3. *What standards or specifications should/could be applied to each type of solid fuel?*

A3. This is an open invitation to create yet another non-productive quango.

- Q4. *What do you believe are the most appropriate, implementable and enforceable regulatory approaches for each type of solid fuel?*
- A4. This question is even more ridiculous - should Garda Siochana be charged with smoking chimney arrests?
- Q5. *How can a transition to less polluting fuels and more efficient heating systems be supported?*
- A5. Remove VAT charges from all hardware and materials that enable alterations that reduce air pollution and increase the efficiency of combustion-based residential heating. Market forces will do the job for you.
- Q6. *What do you think is an appropriate timeframe for the implementation of a national regulation of solid fuel?*
- A6. The concept of a "one-fit-all" national regulation is a nonsense.
- Q7. *What timeframe should be applied to the inclusion of new solid fuels into legislation to allow for the necessary transition, including the phase out of existing stocks?*
- A7. If a fuel is such a health hazard, how can a gradual transition be justified? Stocks should be impounded and buried in landfill.
- Q8. *Should suppliers and retailers be given a transition period to use up existing stocks of solid fuels not meeting emission standards and, if so, how long?*
- A8. No - same answer as A#7.
- Q9. *Are there particular challenges in terms of the enforcement of regulations applying to solid fuel burning, and how might these be best addressed?*
- A9. Same answer as A#4 – roll out the smoke police.
- Q10. *Do you have any further proposals to reduce air pollution from residential heating?*
- A10. Same answer as A#5.
- Q11. *What performance standards, certification methods or quality schemes should/could be used to reduce air pollution caused by burning solid fuels?*
- A11. Same answer as A#3.
- Q12. *Would broadening the application of the 10 gram smoke per hour to all solid fuels be appropriate?*
- A12. Same answer as A#1.

Q13. *Are there any additional or different emission standards which could be applied to the broader range of fuels?*

A13. Standards are the remit of the N.S.A.I.

Q14. *Is it appropriate to use moisture content as a standard for the application of regulations to wood and, if so, at what limit should the moisture content be set?*

A14. Same answer as A#1.

Q15. *What limit should be set as a cut-off point for the sale of wet wood?*

A15. Why limit the control to sale - surely if it is such a hazard passion should be equally prohibited?

I would further comment as follows:

- Since our national policy is to decarbonise all energy production, the elimination of particulate pollution is an automatic by-product of climate change mitigation. As such, the interim measures proposed in this consultation are somewhat moot.
- It is both uneconomic and unreasonable to get cash-strapped households trying to get back on their feet whilst in a (hopefully) post Covid recession, to invest in interim pollution reduction measures when these will be shortly rendered obsolete by full decarbonisation.
- This consultation runs the risk of creating a raft of pointless non-productive public service jobs at the very time that these need to be fully focused on reducing our out-of-control national greenhouse gas emissions.

Decarbonisation is achieved by **electrifying all home heating**, not by changing the form of combustion-based residential heating.

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