



Críostóir

Ó Faoláin

Dungarvan Local Area Rep

Air Quality Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford
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TAG: Public Consultation on Solid Fuels

A chara

I am writing to you in relation to the public consultation on solid fuels.

I am in favour of the national regulation of solid fuels used in home heating. There is significant evidence of the harmful effects of burning solid fuels for home heating, both in terms of GHG emissions and negative health effects. All solid fuels should be subject to regulation, with the strictest regulation – up to and including a full ban, applying to those solid fuels which produce the highest levels of fine particulate matter.

I support the national application of the regulations currently applied to bituminous ('smoky') coal. These regulations have been effective in those areas in which they have been implemented. There is evidence to suggest that smaller settlements in which the regulations have yet to be implemented suffer from poorer air quality than larger settlements in which the regulations have been applied. I am in favour of the rapid extension of the current regulations on a nation-wide basis. Should there be a delay in the nation-wide implementation of the smoky coal ban, I suggest that the regulations be immediately extended to all settlements with a population of over 5,000 as an interim measure.

Nation-wide regulation is necessary to ensure the effectiveness of the regulation. In relation to the existing localised smoky coal ban, I am aware of instances where individuals travel a relatively short distance outside the existing Low Smoke Zone to purchase smoky coal for use within the Low Smoke Zone. Nation-wide regulation would prevent this activity and reinforce the effectiveness of the ban within existing Low Smoke Zones.

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I believe that this consideration should apply to the regulation of all solid fuel types. I suggest that the department consider engagement with the NI Executive to explore cross border cooperation in the implementation of this policy on an all-island basis to prevent the same issue arising in border areas.

The ultimate policy aim should be to fully transition away from the use of solid fuels for home heating in Ireland. A national regulatory approach to solid fuel burning for home heating should be seen as a tool to achieve this policy aim, in tandem with measures to upgrade and retrofit existing housing stock to energy efficient heating systems.

The concept of a just transition must be central to how this policy is developed. There are many people for whom burning solid fuel is the only way they have of heating their homes. While the regulation of solid fuels can create an incentive to transition away from the use of solid fuels for the purpose of home heating, it must be recognised that there is significant inequality in the capacity of households to engage in such a transition. Poverty proofing the policy is a key consideration. Lower income households have often found themselves in the position of not being able to fully heat their homes due to cost. This same problem arises when it comes to making the transition to an energy efficient heating system. A lack of affordability will prevent participation among this group even where clear benefits, such as lower future heating bills and a warmer healthier home, are presented. With solid fuel costs set to rise due to increasing carbon taxes, and the use of some solid fuels due to be further restricted through regulation, we must make sure not to create a trap of rising fuel costs on the one hand coupled with an unaffordable cost of transitioning away from solid fuel based home heating on the other.

While the lowest income households must be to the fore when considering the impact of this policy, specific consideration should also be given to those at the margins of the social welfare system, households whose income may place them outside the welfare net but who still have limited disposable income and are highly conscious of affordability, especially those in older demographics.

Another issue to be considered is making the transition away from solid fuel based home heating systems attractive to older home owners. It must be attractive and affordable for the owners of older homes to get their property retrofitted if we are to achieve the objective of retrofitting the bulk of older housing stock to reduce carbon emissions. Elderly home-owners, the group most likely to own older homes and rely on solid fuel based central heating systems, are less likely to be convinced by arguments that their investment will be paid back in time through lower home heating bills.

Financial support to participate in the transition away from home heating based on solid fuels should be at the centre of this policy. Significant public investment is needed to retrofit older houses. We must give people the opportunity to change their home heating system where necessary so that they will have the ability to heat their homes in a healthy way, without incurring a huge cost.

This will be crucial in terms of both poverty proofing the proposed policy, and convincing older home owners to participate in the transition to a more energy efficient home heating system. The introduction of new solid fuel regulation should be progressive and timed to follow and complement public investment in retrofitting the existing housing stock.

I hope this submission meets with your consideration and approval.

Le dea-mhéin



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Green Party Local Area Rep for Dungarvan

Ionadaí Áitiúil an Chomhaontais Ghlais do Dhún Garbhán