

SUBMISSION FROM KERRY COUNTY COUNCIL TO CONSULTATION ON DEVELOPMENT OF A NEW SOLID FUEL REGULATION FOR IRELAND

Kerry County Council supports the principle of a national ban on the sale, supply and use of bituminous ("smoky") coal. Data from the air quality monitoring carried out in a number of the existing Low Smoke Zones (LSZ) shows that the current regime is not effective. In addition enforcement of the existing restrictions is challenging, particularly in smaller towns with easy access to outlying fuel-supply outlets beyond the LSZ boundary. Enforcement of the ban on the domestic use of restricted fuels is also difficult given the issues around access to private property.

We agree that consideration should be given to restricting the supply, sale and use of certain other domestic solid fuels, such as wet wood, at national level. Examples of existing restrictions in this regard are already in place in other jurisdictions and in particular the issue of moisture content, typically less than 20%, is noted. However, any proposed restrictions must take account of the traditional use of certain locally sourced fuels, such as peat, for individual domestic purposes. In this regard, it should be noted that a number of the elected members of Kerry County Council have raised specific concerns about any proposal to prohibit the extraction and use of peat as a domestic solid fuel .

We are of the opinion that a national ban on the sale, supply and use of bituminous coal should be introduced as a priority and in the shortest timeframe possible, at the latest for the 2022/2023 winter season. However, consideration may need to be given to a phased introduction of any other fuel restrictions in order to allow the development of domestic supply capacity etc.

It is also important to ensure that any proposed restrictions do not impose undue financial strain on households and that appropriate government supports are provided as necessary. We would also suggest that supports and incentives should be made available to encourage households to upgrade to higher efficiency heating appliances and systems.

Education and guidance is required to inform the public and industry on issues such as the appropriate installation, use and maintenance of domestic solid fuel appliances, flues etc. A review of the available national and International research and guidance in this area should be undertaken and a public information campaign developed.

Any proposed restrictions would need to be backed up by appropriately robust legislation and in this regard we would recommend a thorough review of the existing primary and secondary legislation. Enforcing authorities also need to be provided with appropriate supports to facilitate the implementation of any new restrictions. Consideration should therefore be given to a regionally or nationally coordinated approach, similar to that

currently in place in the areas of waste and water quality. An effective tracking and tracing regime would also be required to ensure that solid fuels placed on the market are appropriately labelled and that the source is clearly identified.

The health and environmental benefits that can be gained from the introduction of a new and improved regime are considerable. We are therefore very supporting of a comprehensive, fair and coordinated approach to the issue particularly in the context of a national drive towards a carbon-neutral society. Finally we would suggest that appropriate consultations should continue with relevant parties, particularly with those who may be directly affected by the proposals.