



Rialtas na hÉireann Government of Ireland

Development of a new Solid Fuel Regulation for Ireland

Consultation questionnaire

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

Yes, the improvements for human health are clear. The current system which works well in large urban settings is difficult to enforce on those distributing in smaller towns.

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

All **commercially sold** solid fuels, with smoky fuels banned and the regulations applying to all low smoke products, for the benefit of human health. The regulations should not apply to solid fuels which have been collected by a householder for use in their own household e.g. domestically cut peat or timber. Enforcement in such circumstances would be all but impossible.

3. What standards or specifications should/could be applied to each type of solid fuel? The bagging and labelling requirements of the existing regulations should be maintained and cover all allowable fuels. In relation to coal the standards should apply on the import of the fuel to the country with appropriate proof and records to be maintained. Interaction needs to take place with Northern Ireland to ensure there are no illegal fuels crossing from one jurisdiction to another.

4. What do you believe are the most appropriate, implementable and enforceable regulatory approaches for each type of solid fuel?

For solid fuels imported into the country all the required standards should be met and demonstrated prior to import into the country or at the ports, with a robust testing and refusal mechanism in place. For solid fuels generated in the country there should be a similarly robust testing and approval system. Retailers and end users of the fuels should be confident what they are selling and burning meets the standards, with a quality mark e.g. SWIFT 7 applicable.

5. How can a transition to less polluting fuels and more efficient heating systems be supported? (Building upon the measures already set out in the [Climate Action Plan](#))

In the planning and design phase of buildings and building upgrades, include measures to eliminate the option to burn any solid fuels for heating or cooking purposes within a building. i.e no stoves, no open fires.

6. What do you think is an appropriate timeframe for the implementation of a national regulation of solid fuel? As soon as possible allowing for the transition period for the sale of existing stocks of specified fuel in areas where this is applicable.

7. 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? The period of one or part of one Winter season should be considered to allow existing stocks to be sold by retailers and suppliers, and burned by householders.

8. 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? Yes, a period of one Winter or part of one winter should be allowed. Engagement should take place with those involved to determine the bulk stock levels in the country. Perhaps the ban could take place in stages with an import ban.

9. Are there particular challenges in terms of the enforcement of regulations applying to solid fuel burning, and how might these be best addressed?

The current regulations require Authorised Officers to provide 24 hours notice prior to entering a domestic residents to carry out an inspection. This gives time for any offending fuel to be removed. Ideally illegal fuels would not be commercially available which would reduce significantly the opportunities for purchasing.

If suspected illegal fuel is detected there is currently no accredited lab available in the country to send the fuel for testing. There is one in the UK however the tracked transport and testing is expensive.

10. Do you have any further proposals to reduce air pollution from residential heating? As per 5 above, if the option of having open fires was removed at planning stage for new builds and large refurbishments, there would be a gradual improvement in air quality as the housing stock is replaced. At present smoky fuel is cheaper than low-smoke fuel, an adjustment to the pricing via a monetary instrument may assist in the move to low-smoke fuels.

11. What performance standards, certification methods or quality schemes should/could be used to reduce air pollution caused by burning solid fuels?

Not technically qualified to respond to this query.

12. Would broadening the application of the 10 gram smoke per hour to all solid fuels be appropriate? Not technically qualified to respond to this query.

13. Are there any additional or different emissions standards which could be applied to the broader range of fuels? Not technically qualified to respond to this query.

14. 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? Not technically qualified to respond to this query.

15. What limit should be set as a cut-off point for the sales of wet wood?

- Bags/nets only
- Up to 2m³
- All wet wood
- Other: (please provide reasons or evidence to support your answer)

Wet wood does not burn effectively and it is unlikely anyone who purchases this fuel will continue to try and use it immediately. However, the same wood once seasoned i.e. allowed air dry for a period of time out of the elements, will burn without issue and will likely meet any moisture content requirements. Perhaps a certified "Ready to burn, with an associated moisture content" label could be incorporated for commercial retailers of wood fuel sold at garage forecourts or fuel depots etc. Wood fuel is often sold locally on a non commercial basis by the trailer load, one tonne bag load etc so enforcing any regulations on those involved would be extremely difficult.

Wood is portrayed as a renewable fuel source, and many people may have moved to wood chip boilers or wood fuelled stoves for this purpose to displace fossil fuels, and this element of this fuel should be recognised in any new regulations. Some consideration should also be given as to how the heat to dry kiln dried wood is generated, as if this heat is from a fossil fuel source it may well negate any carbon benefits to burning the wood.