



Clean Air Strategy Public Consultation
Air Quality Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford
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By email

Irish Bioenergy Association (IrBEA)

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From: [REDACTED]

To: airquality@decc.gov.ie

3rd May 2022

IrBEA Response to Clean Air Strategy Public Consultation

Dear Sir / Madam,

Thank you for the opportunity to contribute to the Clean Air Strategy Public Consultation on behalf of our members. IrBEA as the representative organisation for the bioenergy sector, calls for policy measures that ensure the correct application of renewable energy whilst protecting our natural environment, terrestrial ecosystems, aquatic environment and air quality. We have answered the specific consultation questions below, but would like to make some general points on the consultation document and proposals including:

- **Climate Emergency**
 - Ireland and the globe is in an existential crisis to reduce our carbon emissions and to protect the global metrological conditions to maintain the current bio spherical environment. Recognising this in 2019 the Irish Government declared a state of emergency to tackle climate change. All policy formation must give strong priority to widespread roll out of carbon emission reduction technologies including solid biomass.
 - There are no benign solutions for the challenges we face. While all renewable energy technologies employed will have the impact of lowering carbon emissions, all of these technologies have other impacts that need to be considered. In many

cases, these impacts are less than the impacts of the fossil fuels they replace which is most welcome, for example replacing fossil solid fuels with dry wood fuels are shown to reduce emissions of particulate matter.

- Current Air Quality in Ireland
 - We note that Ireland's air quality is now being continuously monitored. This is a welcome development. We also note that this monitoring has demonstrated that Ireland has no recorded breach of annual EU air quality limits of PM 2.5.
 - We note the referenced Air Quality in Europe – 2020 Report, Fig 4.10 of which shows that on an EU scale Ireland's PM 2.5 levels are relatively low, being 6th lowest across the 27 member states. And less than half (7.8) the required EU limit of 25 micrograms annual average, and under the WHO guideline value of 10.
 - As stated in the consultation paper Ireland has been below its 2020-2029 reduction commitment since 2011 (in tonnes/annum), and was only marginally above 2030 commitment in 2019. It can be expected that Ireland will meet its commitments with current, and currently planned policy measures.
 - We note the figure being used, that PM 2.5 causes 1300 deaths per year in Ireland. We believe this figure over represents the findings of the Air Quality in Europe – 2020 report. This report states PM 2.5 as causing 1300 premature deaths, however on further reading it clarifies this in terms of Years of Life Lost (YLL) which is considered a more accurate depiction of the scenario. Ultimately YLL from PM2.5 is shown to reduce average life expectancy by a total of 29 hours (335 years / 100,000). While regrettable – this is most likely very insignificant when placed against other causes of premature death. Regarding YLL, Ireland ranks third best in Europe, after Iceland and Norway, which demonstrates a good level of air quality in Ireland when compared to many other European countries.
 - We consider that while improvement of air quality in Ireland should be pursued, context should be given to the overall impact, current air quality, and other government policy pressures.
- Overall policies for solid fuels
 - We are concerned that this consultation appears to have already decided on a policy of ceasing the use of solid fuels without considering all relevant aspects such as current air quality, mitigation measures available and due to be employed, and distinguishing between renewable and non renewable sources of heating.
 - Section 8.3.5 makes the statement “it will take time for all households to remove dependency on solid fuels”. We do not agree that policy should pursue a removal of solid fuels for heating.

- Section 8.3.6 makes the statement “In order to support a transition away from the use of high polluting fuels the Department will continue to promote and encourage the removal of solid fuel heating systems through its national retrofit schemes”. We do not agree that the Department should unilaterally pursue the removal of solid fuel heating from Irish society.
- IrBEA members do not agree with the general view that all solid fuel combustion must be universally stopped. Across Europe, policy measures recognise and there is considerable encouragement to use wood fuels to reduce carbon emissions using for example EcoDesign technology and quality assured fuels to address air quality concerns.
- We note the planned roll out of 500,000 heat pumps and retrofits to reduce domestic heating carbon emissions. However it is now clearly evident that these targets will not be met, the programmes have fallen far short in 2020 and 2021, and with the continued labour shortage and increased costs associated with retrofitting this situation is expected to get worse. The use of solid fuels, in particular for rural settings is a vital component of Ireland meeting its 2030 climate targets.
- We fundamentally oppose the view, that solid fuel combustion should be stopped. Government policy should recognise that technological advances can address air quality concerns. Government should recognise the importance of renewable solid fuels in meeting the challenges of the Climate Emergency.

As industry representatives and on behalf of members, we look forward to meeting and engaging with the Department to discuss the various aspects of our submission. We believe active engagement can be beneficial to all sides as the process of ensuring the joint goals of tackling the climate emergency and protecting Irelands air quality are met.

Yours sincerely,

[Redacted signature]

[Redacted signature]

Irish Bioenergy Association (IrBEA)

Tel: [Redacted]

[Redacted signature]

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Irish Bioenergy Association (IrBEA)

Tel: [Redacted]

IrBEA Response to the specific consultation questions.

1. Do you agree with the five strategic priorities outlined in the draft strategy?

a. To ensure continuous improvements in air quality across the country

We agree that continuous improvement of air quality should always be a goal. However we also consider that policy should recognise that Ireland has some of the cleanest air in Europe, and that Ireland has never breached air quality requirements as set out for PM2.5. The pursuit of this goal should not come at the excessive expense of other required policy measures such as climate change. Ireland has not declared an emergency in terms of air quality – nor does it need to, however it has declared an emergency in terms of tackling climate change. We refer to our cover letter for further information.

b. To guarantee the integration of clean air considerations into policy development across Government

Again while we agree that clean air considerations should be a factor in other policy measures, it must not come at the excessive cost of other vital policy. Air quality in Ireland is actually very good, and is improving with many measures that are already in place or planned. We refer to our cover letter for further information.

c. To increase the evidence-base that will help us to continue to evolve our understanding of the sources of pollution in order to address them more effectively

We support the continued expansion of the AAMP, data provided by the current network is very valuable.

We suggest that funding be put in place for mitigation measures for solid fuel combustion. This would include research and funding for:

- Public awareness on proper combustion and proper appliance maintenance campaign. Research has shown that consumer behaviour can have a considerable effect on air emissions.
- Fuel research
- Installation information for correct installation of appliances
- Development of enhanced appliances, as well as post combustion mitigation measures such as filtration.

We welcome the establishment of a Clean Air Research Forum and would be more than happy to become part of this forum.

d. To enhance regulation and improve the effectiveness of our enforcement systems

We would caution against further enhancement of fuel regulation until proposed regulations are enacted and their effect noted. As is shown Irelands air quality is of a high standard and the proposed regulations due to take effect in September of this year should further enhance air quality.

e. To promote and increase awareness of the importance of clean air

We consider that this should go along side a campaign to teach consumers about correct appliance use and maintenance. There are many messages that must be put to the public over the coming years, the most important of which is climate action. It is very important that confusing messages such as discouraging use of stoves are not put into the public domain. We would caution against the strategy last year of encouraging people not to light their stoves – experience with water charges and turf cutters has shown that the general public can react badly to such campaigns. We are aware that the suggestion of not burning had a similar reaction.

2. Do you feel there are additional strategic priorities which should be included?

Climate action, rural employment, affordable housing and fuel poverty are all effected by the proposed policy. Given that Irish air quality is actually not in considerable difficulty then consideration must be given to polices with higher needs at this time.

3. How can pollutant emissions data be better used to inform actions at local and national levels?

Clear indication as to the source fuels that cause the emissions would assist, coupled with information as to how the consumer can reduce emissions through correct fuel choice, correct appliance use and maintenance.

4. What do you feel are the most important current and emerging air quality issues in Ireland that require further research?

In terms of particulate matter, which is our primary concern, measures for mitigation including fuel quality and type, and appliance design are critical factors that can achieve considerable reduction.

EcoDesign stoves and fuel quality will reduce PM2.5 emissions. We know from the evidence produced through EPA Stove Combustion Research Report 324 that wood fuels already produce as little as half the PM of “smokeless” coal products. This result was achieved in stoves not optimally designed for firewood, which leads to the assumption that considerable further reductions can be achieved with EcoDesign stoves designed to combust dry wood fuels.

5. How can we better increase awareness of the health impacts of air pollution?

We refer to the notes in our cover letter.

6. What issues might a national clean air awareness campaign encompass and how could its impact be measured?

7. What particular metrics or benchmarks do you think should be considered in tracking the progress of a Clean Air Strategy?

8. Are there any other comments you have in relation to the draft national Clean Air Strategy?

Please refer to our cover letter