Draft Clean Air Strategy

About OFTEC

Established in 1991, OFTEC is a ‘not for profit’ trade organisation representing manufacturers of liquid fuel heating and cooking equipment and training providers in the UK and Republic of Ireland. As part of our commitment to ensuring high standards, we run a competent person registration scheme for heating technicians working in off-gas grid heating, including liquid fuels, biomass, heat pumps and solar thermal technologies.

OFTEC’s response to the draft clean air strategy

OFTEC agrees with strategic priorities outlined in the strategy.

However, OFTEC is concerned that emerging strategies to achieve the decarbonisation of heat in Ireland may inadvertently conflict with the ambitions of the Clean Air Strategy to improve air quality.

The SEAI has recently published its National Heat Study to provide “a comprehensive assessment of the options available to decarbonise Ireland's energy used for heating and cooling homes, businesses and industry”. The study identifies important roles for heat pumps and solid biomass heating systems. These systems are already supported by the government in heat policy.

While the use of heat pumps will theoretically reduce emissions at the point of use, the poor energy efficiency of many buildings could lead to unacceptably high running costs unless deep retrofits to address the lack of insulation are also undertaken. Given the high number of homes needing retrofits, and the extremely high cost involved, OFTEC thinks it is extremely unlikely that either consumers, or public finances, can afford to fund both the deployment of heat pumps and associated energy efficiency improvements. Nevertheless, in OFTEC’s view, the need to take action on climate issues is likely to lead to the installation of heat pumps becoming mandated, and other options being banned, discouraged or restricted.

In such a scenario, we fear that the high costs and associated disruption of deep retrofits will lead to many heat pumps being installed in unsuitable buildings, necessitating the increased use of solid fuel secondary heating systems to provide adequate warmth and reduce energy bills. This will lead to high levels of air pollution, making it difficult to achieve meaningful reductions from this sector. Far from improving air quality, it may lead to the current situation becoming worse.

The National Heat Study also identifies that “between 7%-17% of heat demand is supplied by bioenergy by 2030 and a similar proportion in 2050”. Most of this is expected to be from domestically sourced solid biomass. In many cases the appliances using this fuel are likely to displace oil-fired heating systems, which typically have much less harmful impacts on air quality than solid biomass systems. We feel policy support for solid biomass heating systems is not aligned with the ambitions to improve air quality set out in the draft strategy.

OFTEC believes that policies designed to address decarbonisation must also take account of and support the need for local environmental improvements, particularly in relation to air quality. Support for solid biomass, or policies that could result in an increase in use of solid biomass as secondary heating, are not consistent with this requirement.

Instead, OFTEC and its industry partners recommend a more technology neutral approach, with the use of renewable liquid fuels such as Hydrotreated Vegetable Oil (HVO) approved and supported as a replacement for heating oil, alongside other technologies, but ideally in preference to solid biomass.

This liquid fuel solution will offer much lower emissions than any solid fuel appliance. HVO-fired oil boilers are also better suited to poorly insulated or hard-to-treat buildings than heat pumps, reducing the requirement for secondary heating and thus reducing the harmful impacts to air quality identified above. HVO is an extremely clean burning fuel, and anecdotal evidence suggests it offers meaningful air quality improvements compared to kerosene. OFTEC is currently arranging for tests to take place to validate this claim, and this will be published in due course.