

# Social Democrats Dublin Bay South Branch – Submission to DECC Clean Air Strategy Public Consultation 3 May 2022

## 1. Introduction

### 1.1 Pollution in Dublin

The rates of asthma in Ireland are the second highest in western Europe<sup>1</sup> and air pollution<sup>2</sup> is a significant contributor to this condition.

- 380,000 people in Ireland currently have asthma.
- 1 in 13 people in Ireland currently have asthma.
- 1 in 10 children currently have asthma.
- 1 in 5 children experience asthma at some stage in their life<sup>3</sup>.

The DCC area has 24 air quality monitors, national (EPA) and local (DCC), see **Figure 1** below (2 of which appear redundant, Glasnevin and Sandymount Green).

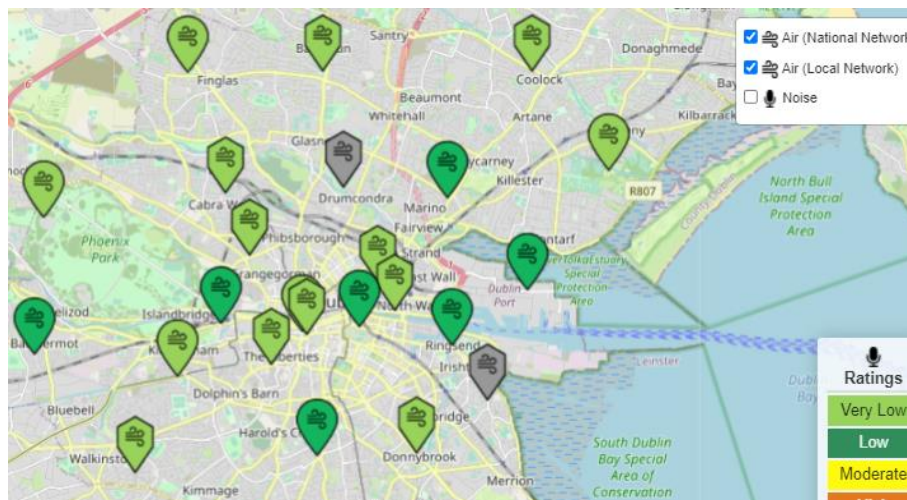


Figure 1 Map showing location of air quality monitors in DCC area

### 1.2 Initiatives to improve air quality

We note that there has been various studies and significant efforts to improve air quality including the Globe initiative<sup>4</sup> with schools, which found the following:

***“There is a consistent trend of deteriorating air quality in schools located in urban centers, especially in the Greater Dublin area.***

*Occasional higher NO<sub>2</sub> pollution levels can occur in schools outside of these urban areas where a school is located near highly trafficked areas. “The Air Quality campaign results suggest that students and staff of city, and some suburban schools, are exposed*

<sup>1</sup> <https://www.asthma.ie/get-help/resources/facts-figures-asthma>

<sup>2</sup> <https://www.epa.gov/sciencematters/links-between-air-pollution-and-childhood-asthma#:~:text=Researchers%20have%20long%20linked%20asthma,worse%20and%20trigger%20asthma%20attacks.>

<sup>3</sup> All statistics from <https://www.asthma.ie/get-help/resources/facts-figures-asthma>

<sup>4</sup> <https://www.globe.gov/web/ireland/home/overview-of-air-quality-campaign/about#:~:text=The%20GLOBE%20Ireland%20Air%20Quality,pollution%20at%20schools%20in%20Ireland>

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*to elevated NO2 concentrations, particularly in parts of the school grounds adjacent to main roads. This is consistent with EPA findings of higher nitrogen dioxide levels recorded in urban environments, where traffic-related air pollution is elevated. It is evident that further investigation is needed to understand the magnitude of this threat.”*

We consider that indicates that further, more comprehensive monitoring is required on an ongoing basis.

The major work in this area, in addition to the EPA, has been undertaken by the four Dublin local authorities which have submitted their action plan to the EPA and the minister. In this action plan, additional monitoring is proposed, but it appears that this may be limited in scope, with just one station being proposed in the short term, as outlined in page 51 of the report:

### PROPOSED ACTION:

1. **Additional national air quality monitoring station to be established in Dublin north inner city.**
2. **On completion of the indicative nitrogen dioxide campaign (end 2021) being carried by the EPA carried out by, The Dublin local authorities will work with the EPA to establish additional monitoring stations in the Dublin region as required in line with findings**
3. **The Dublin local authorities will collaborate with the EPA on ongoing indicative monitoring across the Dublin region**

We also note that the action plan was instigated due to a single incidence of exceeding the permitted levels of pollution, in St. Johns Road, Dublin 8, levels which are proposed by the EU to be reduced in the future. **We think that there would have been many more incidents recorded if the monitoring regime was more expansive.**

We also note the National Air Pollution Control Programme Report Update of the 2019 NAPCP Ireland February 2021, where it stated on page 76 that:

*“The expansion of the network of monitoring stations through the National Ambient Air Quality Monitoring programme has been of value in regard to monitoring and managing national air quality. It is acknowledged that this increased monitoring activity may help to identify new ‘hotspot’ areas where further action and initiatives are required into the future to tackle more localised impacts that can be missed on the broader scale assessments. In addition the EPA has secured EU LIFE funding for further development modelling and forecasting, which will feed into the next NAPCP.”*

We therefore urge that the monitoring programme though expanding, to include far more monitoring stations than currently planned c.190 nationally, as we understand. We know that in our own constituency of Dublin Bay South, there are many points of standing traffic blackspots such as Pearse Street/Macken street (leading to Samuel Becket Bridge), Donnybrook, Rathmines Road etc. where air quality is poor. These are just a sample of possible points which require monitoring. All schools in built up urban areas should also be monitored on a permanent basis.

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