

Draft Clean Air Strategy
Public Consultation March 2022
Dublin City Council submission

Background

The Department of the Environment, Climate and Communications has invited submissions on the draft Clean Air Strategy. The closing date for submissions is Tuesday 3 May 2022.

The draft Clean Air Strategy outlines how to enhance and protect the quality of the air and realise the full environmental and health benefits of cleaner air. The Strategy builds upon the National Air Pollution Control Plan (NAPCP), which sets out a pathway based on a comprehensive cross-Government programme of policies and measures that will tackle all sources of air pollution, including those from the transport, agriculture and residential sectors. The Strategy also builds upon the ambition of Ireland's Climate Action Plan which includes a range of actions required to realise the synergies between coherent air and climate policy. These include the electrification of the road transport fleet, taking action in relation to ammonia, improving the energy efficiency of our homes and reducing our reliance on solid fuels.

The Clean Air Strategy will complement the National Air Pollution Control Programme (NAPCP) which is a technical document which identifies the pathway to compliance for each pollutant. An updated NAPCP was submitted to the EU Commission in February 2021, and since then, the 2021 Informative Inventory Report (IIR) and national air pollutant emission projections have been released (IIR 2021).

The intention is that the Clean Air Strategy will be regularly reviewed in line with the IIR, updates to the NAPCP, stakeholder engagement and national policy developments.

The Clean Air Strategy provides the high level strategic policy framework necessary to identify and promote the integrated measures across government policy that are required to reduce air pollution and promote cleaner ambient air while delivering on wider national objectives.

The key strategic priorities are:

1. To ensure continuous improvements in air quality across the country;
2. To guarantee the integration of clean air considerations into policy development across Government;
3. 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;
4. To enhance regulation and improve the effectiveness of our enforcement systems;
5. To promote and increase awareness of the importance of clean air

Framework for consultation

The Department of the Environment, Climate and Communications have developed some specific questions that may assist in formulating a response:

Consultation Questions

1. Do you agree with the five strategic priorities outlined in the draft strategy?
2. Do you feel there are additional strategic priorities which should be included?
3. How can pollutant emissions data be better used to inform actions at local and national levels?
4. What do you feel are the most important current and emerging air quality issues in Ireland that require further research?
5. How can we better increase awareness of the health impacts of air pollution?
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

Dublin City Council response

In responding to this public consultation, Dublin City Council is very aware that this is the second such exercise in the past five years (the previous one in 2017 being “*Cleaning Our Air - Public Consultation to inform the development of a National Clean Air Strategy*”). Many of the proposed initiatives in the 2017 draft Clean Air Strategy have yet to be addressed.

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

Dublin City Council agrees with the five strategic priorities in the draft strategy but is concerned there is no hierarchy of priority accorded to these strategies. Specifically in respect of the strategy to enhance regulation and improve *the effectiveness of enforcement systems*, Dublin City Council reiterates the point made in the previous consultation that the Air Pollution Act 1987 is unfit for purpose. Dublin City Council participated in the recent review of the 1987 Act. Our view then and now is that a new Clean Air Act is necessary. Such new legislation could give a statutory basis to much of what is proposed in this strategy. Dublin City Council would strongly prioritise the development of such legislation.

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

Dublin City Council asserts that there must be a clear and unambiguous amalgamation of the climate action and clean air agendas and this should be a stand out strategic policy. By way of example, the move towards introducing decarbonisation (solely) zones appears to be moving without specific regard to the clean air agenda, and crucially without regard to the obvious synergies between the two.

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

Emissions data is generally only available on an aggregated geographical/sector basis in Ireland, with very patchy information for a wide range of pollutants. The development of a national emissions inventory, covering stationary and mobile sources down to a 1 km² grid is a necessary and overdue requirement.

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

Ireland benefits from the fact that it has an active, engaged air quality and health research community, and there are a clear funding priorities established through the EPA Research Programme :

https://www.epa.ie/publications/research/epa-research-2030/EPA-Research-2030_2021-2023-Thematic-Research-Areas-Assessment_Final.pdf

In this respect, the increasing emphasis on research into the health related aspects of air quality is welcome. One area that is of particular interest to local authorities is to explore how to formally engage with research teams on their emerging findings and to collaborate on the formulation of practical measures and guidelines from this research. Bringing local authority representatives onto the Technical Steering Committees of EPA funded research projects is one practical example of how this could be progressed.

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

A meta-study of this issue published in 2021 by *Riley et al.* (see: <https://link.springer.com/article/10.1007/s11625-021-01038-2>)

provides a clear framework for increasing awareness of the health impacts of air pollution.

A number of their findings particularly resonate with the Irish context:

- The importance of developing messages that connect people to and emphasise collective action in order to strengthen engagement through reinforcing perceptions of collective responsibility.
- Air pollution communication campaigns focus on health benefits from a reduction in pollution, but none of those reviewed communicated the co-benefits of action on air pollution.

- Positive framing that focuses on the gains and benefits from action rather than the losses from inaction may reassure and empower people that there are feasible actions to mitigate the effects of pollution
- Providing information that is relatable, understandable and local
- Current air pollution communication relies on data, indices and numbers with little focus on connecting with people's emotions or placing humans at the centre of communication. The drive for more accurate or precise data is unlikely to engage people at scale unless this information is made relevant to people and their everyday lives, engaging with them emotionally in a way that can trigger individuals' automatic motivations.
- To overcome the tradition of treating the public as recipients of information, engaging with individuals and community groups to understand their needs and expectations is recommended.

The Clean Air Together campaign (a joint project between the Environmental Protection Agency and An Taisce) which took place in October-November 2021 is a good example of how citizen science initiatives in Ireland can reach a large target audience and have a very positive impact in terms of raising public awareness around air quality and health. Dublin City Council supports the continuance and expansion of such air quality projects.

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

Dublin City Council asserts there is general consensus amongst stakeholders on the priority issues, namely:

- Implementing the bituminous coal ban nationwide coupled with reducing solid fuel dependence for home heating
- Reducing transport emissions by moving towards more beneficial modes like walking, cycling, public transport and, additionally, making public transport cleaner in respect to air quality
- Identifying, quantifying and reducing emissions from industrial, agricultural and shipping sources
- Strengthening buy in for green infrastructure planning and low emission solutions across transport, housing and energy sectors.

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

The draft strategy is in large measure an amalgamation of existing elements of strategic priorities in the transport, energy and agricultural sectors. It is unclear how the Clean Air Strategy will influence or modify those policies.

The most important metric for consideration therefore in the Clean Air Strategy is a clear timetable for implementation of the chosen measures which are incorporated into a National Clean Air Implementation Plan.

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

The move towards providing a comprehensive framework for governance and oversight for air quality is welcome. It will however be a challenge to ensure the overall functions and inter-relationships between the various proposed bodies are clearly defined and delineated.

The draft strategy proposes to establish:

- A Cross-Government Air Quality Implementation Group
- A Clean Air Research Forum
- Air Quality Enforcement Regional Support Structures
- A Clean Air Communication Strategy Group
- A Clean Air Forum

It is also proposed that the existing UTRAP (Urban Transport Related Air Pollution) Working Group to become a forum for continued engagement between the key transport stakeholders. This approach could result in effectively a limited number of key representatives from various agencies working on a variety of bodies with overlapping agendas without clear line of sight as to where those responsibilities begin and end.

The effective functioning of all the above groups is predicated on having primary clean air legislation that is fit for purpose. Dublin City Council therefore urges that the proposal in the draft Strategy to develop a Clean Air Act be commenced as a matter of priority.