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Clean Air Strategy Public Consultation  
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**Re: Clean Air Strategy Public Consultation**

To whom it concerns

The Environmental Health Association of Ireland (EHAI) wish to make the following submission in relation to the current consultation on the Clean Air Strategy for Ireland. The EHAI, which was founded in 1949, is a non-Government Association with Registered Charity status and professional body that represents those engaged in the environment and health protection fields. Our primary aim is to promote Environmental Health and to educate, advise and heighten the awareness of Environmental Health issues among the public and the profession.

Our consultation submission is based on the eight questions as provided in the consultation document;

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

The EHAI supports the five strategic priorities in the draft clean air strategy but notes the absence of a hierarchy of priority accorded to these strategies.

In respect of the strategy to enhance regulation and improve the effectiveness of enforcement systems, the EHAI believes the Air Pollution Act 1987 is unfit for purpose and the introduction of a Clean Air Act requires immediate action.

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

The EHAI would like to see a joined up approach to the climate action and clean air agendas and this should be a central element of strategic policy. The move towards introducing local decarbonisation zones is moving ahead without regard to the clean air agenda, and without regard to the interrelationship between the two policy areas.



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

It is essential that the public have access to a precise picture of current air quality in their own area. Currently, there is a lack of emissions data for most pollutants on an aggregated geographical/sector basis in Ireland. The development of a local national emissions inventories covering stationary and mobile sources is required. The development of an air quality management dashboard to predict and assess the air quality will provide transparency to members of the public.

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

Ireland has an active air quality and health research community, with funding established through the EPA Research Programme. In this respect, the increasing emphasis on research into the health related aspects of air quality is welcome. One particular interest to environmental health is to explore how to promote public engagement in research projects as this is essential to influencing behaviour change.

Another air quality issue that we feel should be included in further research is the indoor use of household products containing volatile organic compounds (VOCs) such as cleaning products, aerosols and soaps. There is little control, except for certain paints and varnishes (*under S.I. No. 564 of 2012 - European Union (Paints, Varnishes, Vehicle Refinishing Products and Activities) Regulations 2012*) on the limitations of emissions and associated exposure of VOCs to human health and the environment. Countries such as France and Denmark have introduced voluntary labelling on products containing VOCs in relation to the impact of indoor air quality when the product is in use in the home.

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

The EHA believe the awareness of the health impacts of air pollution can be increased by:

- Developing messages that connect people to and emphasise collective action in order to strengthen engagement through reinforcing perceptions of collective responsibility.
- Ensuring air pollution communication campaigns focussing on health benefits from a reduction in pollution.
- Positive framing that focuses on the gains and benefits from action rather than the losses from inaction may so as 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 over relies on data, indices and numbers with little focus on connecting with people's emotions or placing humans at the centre of communication. This does not 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.
- Overcoming the tradition of treating the public as recipients of information, engaging with individuals and community groups to understand their needs and expectations is recommended.



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

- Introducing the bituminous coal ban nationwide.
- Promoting 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?**

Given the lack of progress since the last public consultation in 2017 on a national clean air strategy, the most important metric for consideration this time around is a timetable for implementation.

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

The draft strategy proposes a raft of working groups and fora with little detail given as to how these will operate and interact.

These include:

- 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 will continue to operate. While governance at national level is to be welcomed, it needs to be matched by funding capacity at local level to address air quality challenges.

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Cian McSweeney  
*Deputy Chair of the EHA*