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Clean Air Strategy Public Consultation,  
Air Quality Division,  
Department of the Environment,  
Climate and Communications,  
Newtown Road,  
Wexford,  
Y35 AP90

12 May 2022

**Re: Clean Air Strategy Consultation**

Dear Sir/ Madam,

The Environmental Protection Agency (EPA) acknowledges and welcomes the opportunity to comment on the Department of the Environment, Climate and Communications (DECC) Clean Air Strategy. Air pollution presents the biggest environmental health risk<sup>1</sup> and a global threat leading to large impacts on ecosystems in Ireland and right across Europe.

In *Ireland's Environment An Integrated Assessment 2020*<sup>2</sup> and the recently issued *Ireland's Environment An Integrated Assessment 2020 – Key Messages Booklet*<sup>3</sup> the EPA outlined that the publication and implementation of the Clean Air Strategy is needed to protect Ireland's air quality. The EPA therefore greatly welcomes the publication of the draft Clean Air Strategy, its key strategic priorities, actions and recommendations. The EPA considers three key points are critical to the success of the draft Strategy:

**1. World Health Organisation (WHO) Guidelines 2021**

Continuous improvements in air quality have a beneficial impact on health and the quality of life. The World Health Organisation (WHO)<sup>4</sup> revised their guidelines, including interim targets, in 2021. The WHO state that *'there is now a much stronger body of evidence to show how air pollution affects different aspects of health at even lower concentrations than previously understood'*. Monitoring undertaken by the EPA across the national Ambient Air Monitoring Network shows that air quality in Ireland is not compliant with the 2021 WHO guideline values. While the EPA acknowledge the significant challenges associated with meeting the WHO

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<sup>1</sup> [European Environment Agency \(EEA\) - Air Pollution](#)

<sup>2</sup> [State of the Environment | Environmental Protection Agency \(epa.ie\)](#)

<sup>3</sup> [Key Messages Booklet - State of the Environment | Environmental Protection Agency \(epa.ie\)](#)

<sup>4</sup> [WHO Global Air Quality Guidelines](#)

interim targets and guidelines the future achievement of the WHO interim targets and guidelines offer a clear measure of clean air quality. The EPA believes that Ireland and the EU should move as soon as possible to adopt the 2021 WHO interim target values with the ultimate ambition being to achieve the 2021 WHO guideline values.

## 2. Consistent and increased enforcement

The EPA has identified the need for increased enforcement of air quality standards/legislation to be applied consistently by Local Authorities. Improvements in the effectiveness of enforcement systems are necessary to enhance regulation. The EPA Report *Focus on Local Authority Environmental Enforcement – Activity Report 2020*<sup>5</sup> has signalled that the proportion of resources dedicated to air and noise enforcement on a national basis is small compared to water and waste enforcement. Nevertheless, air and noise have a significant environmental and health impact. To deliver improved air quality and noise reductions, local authority enforcement work is key. In this regard the EPA has recommended that:

- a. Local authorities should engage in co-ordinated and targeted inspections of solid fuel supplies particularly at the point of entry of the specified fuels onto the market. This should be supported by sample analysis and follow-up enforcement action, where needed, and
- b. Local authorities should build on the good work being done on assessing planning applications/permissions and continue to assist with appropriate environmental controls in relation to air and noise planning conditions.

## 3. Implementation

The strategy outlines actions and recommendations across key sectors impacting on ambient air quality in Ireland. Timely and effective implementation and roll-out of the actions and recommendations will be an absolute necessity to achieve the essential improvements in air quality. The commitment to regularly review the actions and recommendations identified throughout the strategy to deliver on the five key strategic priorities is necessary.

### Further comments on the Draft Strategy

The EPA report *Air Quality in Ireland 2020*<sup>6</sup>, based on air monitoring across the national Ambient Air Monitoring Network, details that while air quality in Ireland was compliant with EU legislation there are significant localised issues and Ireland cannot meet the 2005 World Health Organisation (WHO) air quality guidelines for multiple pollutants at monitoring sites across the country. The report reiterates that monitoring carried out by the Environmental Protection Agency (EPA) over the last number of years has highlighted the need for action on the two key issues that have a negative impact on air quality in Ireland. The key issues identified are particulate matter emissions from the burning of solid fuels in our homes and nitrogen dioxide transport emissions from vehicles in urban areas.

- Particulate matter levels continue to be a concern countrywide. All solid fuels (e.g. coal, peat and wood) produce fine particulate matter emissions. Fine particulate matter in our air greatly

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<sup>5</sup> [LA Activities Performance Report 2020.pdf \(epa.ie\)](#)

<sup>6</sup> [Monitoring & Assessment: Air Publications | Environmental Protection Agency \(epa.ie\)](#)

impacts respiratory and cardiovascular health. This is particularly problematic in or near villages, towns and cities because of the cumulative effects of multiple sources of the pollutant and the large numbers of people exposed. Moving to cleaner ways of heating our homes will significantly improve air quality.

- Monitored nitrogen dioxide levels were much reduced in 2020 as a result of reduced traffic volumes. The final report from the joint Department working group on Urban Transport Related Air Pollution (UTRAP) will be critical to sustained reductions in nitrogen dioxide.

The EPA will complete the National Ambient Air Monitoring Network in 2022 with the establishment of 116 monitoring stations which will accurately measure the concentration of pollutants in the ambient air. In addition, outputs from the EU part-funded LIFE Emerald project in 2022-2023 will include models to provide:

- A 3-day national forecast system including high resolution elements for urban areas, linked to the Air Quality Index for Health (AQIH);
- Nowcast maps to provide accurate estimates of air quality across the country, based on air quality results from the National Ambient Air Monitoring Network; and
- Historical national and city level baseline maps.

Citizen science projects, including Globe Schools and Clean Air Together, have highlighted the significant interest among the population to engage and learn about air quality. The EPA is developing a new Citizen Science Strategy and is looking at additional opportunities to engage with the public on environmental topics including air quality. Partnerships with the Health Service Executive and health advocacy groups may offer opportunities to increase awareness of the health impacts of air pollution.

While Ireland was compliant for 2020 with the emissions reduction commitments under the EU National Emission Reduction Commitments (NEC) Directive for nitrogen oxides, non-methane volatile organic compounds and sulphur dioxide, the EPA report *Ireland's Air Pollutant Emissions 2020 (1990-2030)*<sup>7</sup> outlines that:

- Ammonia emissions are non-compliant with the 2020 National Emissions Reduction Commitment, driven by emissions from manure and fertiliser use in the agriculture sector;
- Non-methane volatile organic compounds (NMVOCs) emissions from spirit production alone have increased by 65 per cent over the last decade and effective abatement measures will need to be identified if future emissions reduction targets are to be met.

Ireland can achieve compliance with the 2030 emissions reduction commitment for ammonia through full implementation of planned ammonia reduction measures, such as Low Emissions Slurry Spreading and use of inhibited urea fertiliser products. The EPA considers it appropriate that the strategy acknowledges that the challenge in implementing the required measures should not be underestimated. Timely and effective implementation of measures and a commitment to continued engagement towards further reducing agricultural air pollution emissions will be necessary.

The Climate Action Plan ambitions in relation to 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 also provide for improvements in air quality.

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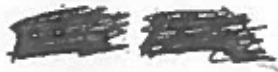
<sup>7</sup> [Monitoring & Assessment: Climate Change: Air emissions Publications | Environmental Protection Agency \(epa.ie\)](#)

The strategy should ensure that the integration of air pollution controls, noise mitigation measures and climate action, for example in transport management, is put in place. This can clearly bring multiple benefits.

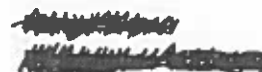
Provision of a high level strategic framework with five key strategic priorities under the overall Clean Air Strategy is strongly welcomed. As part of the Strategy preparation process full consideration should be given to, as appropriate, the specific and detailed comments in the attached Appendix.

The EPA looks forward to the adoption of the Clean Air Strategy and working together with the Department and other partners and stakeholders towards its full implementation, and ultimately the enhancement and protection of the air that we breathe and a higher overall level of public health protection.

Yours Sincerely,



National Ambient Air Quality Unit



Environmental Monitoring and Surveillance Programme

## Appendix

As part of the Strategy preparation process Full consideration should be given to, as appropriate:

- The requirements of the Strategic Environmental Assessment (SEA) Directive and implementing regulations (S.I. 435 of 2004, as amended) and the Habitats Directive. The EPA *Good Practice Guidance for SEA Screening* can assist in considering whether SEA is required for the Roadmap<sup>8</sup>
- The tracking of the update of the actions listed in the Teagasc Ammonia Marginal Abatement Cost Curve (MACC) 2020. This would be a useful metric towards achieving ammonia targets.

In addition, the Strategy should be mindful of, and refer to, the targets in the European Zero Pollution Action Plan, in particular:

- Improving air quality to reduce the number of premature deaths caused by air pollution by 55%
- Reducing by 25% the EU ecosystems where air pollution threatens biodiversity.

The EPA notes the importance of the following specific items outlined in the strategy:

- Strengthening our Evidence Base –
  - The recognition of the comprehensive evidence base provided by the EPA including annual inventory and projections and data from the enhanced National ambient air quality monitoring network
  - The establishment of a Clean Air Research Forum to discuss knowledge gaps and future research priorities. This highlights the important role of air quality research such as the recently published report on Residential Solid Fuel Use in Ireland and the Transition Away from Solid Fuels<sup>9</sup> towards providing the evidence base for informed policy making
  - The National Ecosystem Monitoring Network (NEMN) has been designed to monitor the impacts of air pollution upon ecosystems, taking a cost-effective and risk-based approach. It incorporates monitoring already being carried out by a number of bodies, including the National Parks and Wildlife Service, Department of Agriculture Food and Marine and the Environmental Protection Agency. The network pairs monitoring of atmospheric pollutants with ecological responses and is currently in the early stages of implementation.
- In relation to transport – The UTRAP group will become a forum for continued engagement between key transport stakeholders
- In enhancing regulation and enforcement – The establishment of air quality enforcement regional support structures
- The range of measures outlined to promote and increase awareness of the importance of clean air, including:
  - The holding of a National Clean Air for Blue Skies day each September

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<sup>8</sup><https://www.epa.ie/publications/monitoring--assessment/assessment/sea-screening-good-practice-2021.php>

<sup>9</sup> <https://www.epa.ie/publications/research/air/research-407-residential-solid-fuel-use-in-ireland-and-the-transition-away-from-solid-fuels.php>

- Formation of a National Clean Air Communications Strategy Group – to raise public awareness at all levels
- A biennial Clean Air Conference – this can build upon the current annual EPA National Air Event
- A Clean Air Forum comprising of key stakeholders to meet to discuss key air related topics