

Irish Cancer Society Response to the Clean Air Strategy Consultation

Submission to Air Quality Division Department of the Environment, Climate and Communications

3 May 2022

Introduction

The Irish Cancer Society welcomes the opportunity to respond to the public consultation on the Clean Air Strategy. The Society would like to see that modifiable risk factors to public health are significantly reduced or eliminated, in order to prevent disease. We are also interested in ensuring that all people can enjoy a clean and safe environment and in particular, wish that people living with and beyond cancer can enjoy a good quality of life throughout their treatment and beyond cancer.

Air pollution is responsible for approximately 1,300 premature deaths per year;¹ which translates roughly to 25 premature deaths per week. Worldwide, 4 million deaths are linked to air pollution, according to the WHO.² Particulate matter in the air can have devastating impacts on the human body, and circulate through the entire body.³

Tackling a seemingly intractable problem such as polluted air requires a global collective effort, with specific actions at local, regional and national levels. The results from a 2019 Eurobarometer survey showed that 3 in 5 people in Ireland believed that air pollution should be addressed at national, and at international level.⁴ Where people reported they were familiar with EU air quality standards, 7 in 10 believed that they were not adequate and should be strengthened.⁵ A significant minority of respondents reported having replaced energy intensive equipment with more energy efficient equipment (40%), or frequently choosing public transport/bicycles/walking over car use (32%), amongst other measures.⁶ The results suggest that the population in Ireland understand national and individual responsibilities towards addressing polluted air.⁷

The Clean Air Strategy is welcome as it acknowledges some of the impacts of poor ambient air quality on health and states that a high number of deaths are attributable to air pollution. Having said that, the Strategy must specifically outline a health and healthcare axis to its objectives and outcomes. Improvements in air quality will be welcome, but it is important to acknowledge that there is really no safe level of air pollution. A drive towards continuous improvement in air quality across Ireland should be underpinned by tangible initiatives and an all-of-Government response. Air quality and sustainable climate goals should be mainstreamed across all Government (funded or implemented) policies, projects and plans to ensure that this remains a top priority. In addition, it is important to foster an enabling environment, such as ensuring that individuals and businesses have the resources and the

¹ Environmental Protection Agency (EPA). 2021. "Large decrease in air pollution from traffic in 2020 due to COVID-19 restrictions." 22 November. Available [here](#)

² World Health Organization (WHO). No date. "Air pollution." Available [here](#)

³ Riondato, E., Pilla, F., Sarkar Basu, A., Basu, B. 2020. "Investigating the effect of trees on urban quality in Dublin by combining air monitoring with i-Tree Eco model." *Sustainable Cities and Society*. Volume 61.

⁴ European Commission. 2019. "Attitudes of Europeans towards Air Quality - Factsheets Ireland." Available [here](#)

⁵ European Commission. 2019.

⁶ European Commission. 2019.

⁷ European Commission. 2019.

availability of feasible and viable alternatives to make environmentally sustainable choices, including alternative modes of transport and availability of grants for training/retraining, among others.

The Irish Cancer Society is part of the Climate and Health Alliance (CHA) – a group of organisations seeking policy solutions towards improving health and health outcomes through climate action. The CHA has also made a detailed submission in response to the Clean Air Strategy consultation, of which the Irish Cancer Society is supportive.

Outlined in this document is a summary of the Irish Cancer Society responses to consultation questions, along with a more detailed response, elaborating on these proposals.

Summary of Irish Cancer Society responses to consultation questions

<p>1. Do you agree with the five strategic priorities outlined in the draft strategy?</p>	<ul style="list-style-type: none"> • Commit to WHO air quality guidelines at very least. • Develop ambitious, clear, time-bound and measurable objectives. • Air quality needs to be monitored on all-island basis, as well as locally. • Clean air dimension must be mainstreamed across all Government departments and policy areas.
<p>2. Do you feel there are additional strategic priorities which should be included?</p>	<ul style="list-style-type: none"> • The right to breathe clean air must be adopted. • Outline, prioritise and measure health benefits of clean air. • Focus on liveable communities, designed for accessibility. • Focus on natural environment.
<p>3. How can pollutant emissions data be better used to inform actions at local and national levels?</p>	<ul style="list-style-type: none"> • Use EPA collected localised data from monitoring stations across Ireland to inform local authorities and support them in planning their response to air pollution and climate. • New Carbon Budgets (national/sectoral) should be integrated into Government department planning.
<p>4. What do you feel are the most important current and emerging air quality issues in Ireland that require further research?</p>	<ul style="list-style-type: none"> • Research should focus on <ul style="list-style-type: none"> - health impacts of polluted air at local/regional and national level. - focus on impact on vulnerable/deprived/marginalised groups - regional and national sources of air pollution (e.g. vehicles, burning solid fuels, etc.) and their impact on human health and the lived environment and recommendations for action.
<p>5. How can we better increase awareness of the health impacts of air pollution?</p>	<ul style="list-style-type: none"> • Plain language, fact-based reporting on the level of air pollution at local/regional and national level needs to be shared with and provided through a number of channels (e.g. Government departments, Met Éireann, media). • Individual and public health message required (plain language). • Trusted voices should speak on the issue, such as healthcare professionals – environmental health training should be rolled out.
<p>6. What issues might a national clean air awareness</p>	<ul style="list-style-type: none"> • A clean air campaign must have very clear and measurable objectives and intended outcomes (with KPIs).

<p>campaign encompass and how could its impact be measured?</p>	<ul style="list-style-type: none"> • A campaign should focus on health benefits; win hearts and minds (storytelling needed); take into account the diversity and different values people have and have tangible take-away messages and calls to action (crucially, viable and feasible alternatives must be available to people to change behaviour).
<p>7. What particular metrics or benchmarks do you think should be considered in tracking the progress of a Clean Air Strategy?</p>	<ul style="list-style-type: none"> • The Strategy requires greater specificity and outline of measurable objectives and outcomes, activities and resource inputs to achieve same. A clear monitoring framework must be available to ensure that the goals of the Strategy are on track, to enable course correction over the course of the strategy and to ensure that the time and resource commitment to achieving the Strategy are being put to efficient and effective use.
<p>8. Are there any other comments you have in relation to the draft national Clean Air Strategy?</p>	<ul style="list-style-type: none"> • Need firm commitment to adopt, at the very least, the WHO guidelines. • Air quality and sustainable climate goals should be an integrated dimension for planning Government (funded) projects and policies. • Need to foster an enabling environment to reduce air pollution, ensuring that individuals and businesses have the resources and viable alternatives in order to make environmentally sustainable choices, e.g. alternative modes of transport, availability of grants for training/retraining.

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

Priority 1: To ensure continuous improvements in air quality across the country

Priority 1 should include an acknowledgement that people need clean air for the benefit of public health. The Strategy should make a firm commitment to adopt, at the very least, the WHO guideline limits⁸ rather than state that it will take WHO air quality guidelines into consideration when setting more stringent legal limits for ambient air quality. Improvements in air quality will be welcome, but it is important to acknowledge that there is no safe level of air pollution.

Priority 2: To guarantee the integration of clean air considerations into policy development across Government

Priority 2 needs to be further explained, it will be important to clearly define what integrating “clean air considerations into policy development” (Priority 2, pages 8, 10 & 65)⁹ will mean in practice and in terms of policy outcomes, and how this will be prioritised across Government. Clear and actionable activities must be integrated into the plan. Air quality and associated health outcomes should be mainstreamed into all Government projects and evidence must be provided to show that these projects will adhere to established thresholds for upholding the Clean Air Strategy and not contributing to ambient air pollution – this is to ensure that initiatives which are implemented and funded by the State are consistent and coherent with the Clean Air Strategy, and that the State is leading from the front.

Priority 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

The evidence base needs to be widened in order to gather air quality data on an all-island basis, which will require the EPA to cooperate with partners in Northern Ireland. Additional data gathering and analysis at local, regional and national levels is required to understand the health impacts of air pollution.

Priority 4: To enhance regulation and improve the effectiveness of our enforcement systems

A roadmap with designated time bound actions to phase out all solid fuels in residential settings should be prioritised over the lifetime of the Strategy to reduce particulate matter/air pollution. Requisite budget to enforce regulations around solid fuels must be made available. In doing so, a plan to ensure the availability of alternative, feasible and viable sources of fuel to substitute for the use of solid fuels for heating should be implemented and adequately resourced, in addition to the existing National Retrofit Plan. In implementing such actions, it is important to prioritise and provide the necessary support to people experiencing fuel poverty.

Priority 5: To promote and increase awareness of the importance of clean air

Priority 5 is an important priority and should include active engagement of citizens, particularly the most vulnerable to inform information needs and understand best communications strategies.

The Strategy should demonstrate intersections between clean air policy and other policies and activities across Government departments – to ensure a system wide approach towards addressing such a complex problem.

⁸ World Health Organization. 2021. “WHO global air quality guidelines: particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide.” World Health Organization. Available [here](#)

⁹ As outlined in the Draft Clean Air Strategy Public Consultation March 2022, available [here](#)

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

The Strategy should also make the following priorities:

- The right to breathe clean air, which could serve as an underpinning rationale for the Strategy.¹⁰
- Improve health outcomes. Health improvements and health benefits should be outlined as a cross-cutting strategic priority with specific actions and defined outcomes throughout the Strategy. The Strategy should outline where communities (in all their diversity) fit into the strategic plan, can engage with the implementation of the plan, and how the plan caters to support the health and wellbeing of marginalised communities and vulnerable people/people living with serious illness who may be disproportionately impacted by air pollution.
- An all-Ireland dimension towards ensuring clean air, in coordination with relevant authorities and departments in Northern Ireland.
- Growing and sustaining the natural environment. Any Clean Air Strategy must recognise, plan for and resource plans to ensure correct reforestation, tree planting and vegetation growth and ensuring green spaces. It is also imperative that efforts to enhance public transport and design or redesign public transport and roadway infrastructure are not enacted to the detriment of the natural environment.
- Liveable communities. Paying attention not just to more sustainable and ecological housing/residential structures but understanding that transformative change is required to ensure that communities have amenities close to where they live and that these are designed with accessibility in mind so that there is reduced reliance on private car use for people who can forego that option. While we recognise people have different mobility needs, and that not every household is located in a village, town or urban area, ensuring that there is local infrastructure planned in line with new housing developments to provide choices (e.g. education, commercial, transport options) to people closer to home.

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

The EPA's network of monitoring stations in Ireland means that localised data are being collected. These data could be provided to local authorities and published in a report which simply explains the findings and areas for action. These reports should form the basis upon which local authorities plan their response to air pollution and climate change with ambitious targets and key performance indicators, and against which they measure the progress of their response.

Data monitoring proposed new carbon budgets, which will establish maximum emissions of greenhouse gases in a five year period,¹¹ with specific reference to maximum emissions by sector, should be delivered to each Government department. A whole of Government approach is needed, and the delivery of such data driven reports should inform sectoral responses (pushed by

¹⁰ United Nations Environment Programme (UNEP). 2021. "Human Rights and Clean Air." 19 May. Available [here](#)

¹¹ Department of the Environment, Climate and Communications. 2021. "Minister Ryan welcomes the first carbon budgets from the Climate Change Advisory Council as a significant milestone in Ireland's efforts to tackle climate change." 26 October (updated). Available [here](#)

Departments) to ensure that maximum emissions are not exceeded, and with recommendations and initiatives to further reduce greenhouse gases.

Pollutant emissions data should be shared daily and widely as part of everyday news bulletins. In reporting on these emissions data, bulletins should explain what this means for people practically speaking. Such action could bring air pollution into a national consciousness.

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

Local/regional and national data analyses of the impact of polluted air should be made available, in a fact-based, plain language format. Importantly, research outputs should be distilled into readable digests in order to ensure accessibility for all.

Research should focus on health impacts of polluted air at local/regional and national level. Such research should also focus on particular groups, e.g. people living with illness and chronic conditions, children, the elderly, pregnant people, people living in areas of deprivation, people with a migrant background, etc., the Traveller community, etc. Such research should be accessible (plain-language and freely available to read) and include recommendations which outline how to reduce exposure to and the harmful impacts of exposure to polluted air.

Additional regular regional and national research briefs on the sources of air pollution (e.g. vehicles, burning solid fuels, etc.) and the types of impact they have on human health and the lived environment, the types of pollutant, etc. and recommendations for action to reduce pollution in the air.

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

Plain language, fact-based reporting on the level of air pollution at local/regional and national level needs to be provided through a number of channels (public health messaging, radio, television, etc.). A daily bulletin (local, regional and national) much like weather reporting could be provided by Government Departments through their communications channels, and engagement with other media outlets to encourage such bulletins should happen. The EPA could provide air quality information to Met Éireann, which could be incorporated into its bulletins.

Crucially, this information has to mean something to the general population, as such bulletins should seek to communicate what this means for a person's health and in terms of meeting clean air and climate goals (against WHO-recommended targets, at the very least).

Awareness raising should not only seek a general audience, but targeted messages for individuals, industry and business, policy/decision makers at local, regional and national level, etc.

In order to raise awareness a number of different strategies and communications styles will be required depending on the audience.

Trusted voices, such as healthcare professionals, must be brought into conversations around air pollution, health impacts and the benefits of breathing clean air. In order to prepare them for the task of conveying such information, mandatory training on environmental health should be rolled out, and integrated into future medical training.

Awareness raising should go beyond telling people about health impacts of air pollution, but it should also inform people of their rights and expectations (e.g. expectation for good health) as well as their responsibilities, the Government's responsibilities, strategies for reducing pollution and viable and feasible alternatives so people can access options which have less impact on polluting the air.

The Life Emerald Project from the EMA has an awareness raising component¹² – impacts and positive lessons from this project should be mainstreamed into future campaigns. Best practice examples in communicating this information should be sought as a means to implement effective communications efforts to increase awareness.

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

A campaign should:

- focus on the immediate health benefits (individual and public) of enhancing air quality, including physical and mental health benefits to be gained. A campaign should focus on the need to protect and improve health amongst vulnerable groups, e.g. children, the elderly, marginalised groups, etc.
- be honest about what is to be gained from reducing level of pollution in the air, and also about the realities of changing behaviours
- win hearts and minds – therefore, human stories, in addition to fact-based information should be the norm.
- take into account the diversity and different values people have and prioritise – in essence, some fact-based messaging about the impacts of polluted air and the need for clean air may be appropriate for a general audience; however, clean air campaigns must also pay attention to messages which will most resonate with people depending on their circumstances and background. Where there are calls to action – people must be aware of their alternatives. As such, message must take into account different regional needs to reduce pollution, as well as mechanisms to do so.
- deliver targeted messages to policy/decision-makers, industry, individuals, etc.
- raise awareness of the alternatives to polluting behaviours and calling for reduction in use of pollution sources (e.g. for some households which do not rely on solid fuel burning for primary heating sources, consider alternatives towards eliminating use of solid fuel).
- have tangible take-away messages and call to action (crucially, viable and feasible alternatives must be available to people to change behaviour)
- take multiple formats, through education and healthcare channels, social media, communication through traditional media, seminars, advertising, literature, etc.

A clean air awareness campaign must have very clear and measurable objectives. It should be multipronged, with central messages and diverse calls to action. The audience should be diverse, and should not only include individuals, but also businesses and industry/agricultural sector, decision-makers, etc. Measurement of impact should focus on multiple data sources, including but not limited to survey and perceptions data (baseline and regular touchpoints are necessary), change in behaviours (e.g. use of public transport, traffic level, private and industry emissions, etc.), change in provision of

¹² Environmental Protection Agency. 2021. "Life Emerald." Available [here](#)

accessible and available publicly run initiatives, e.g. public transport, change in legislation, additional supports for clean air agenda, etc.

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

The Government must implement legally binding air quality targets in line with WHO Air Quality Guidelines at a minimum. Clean Air Strategy must be measured against these targets. In addition, the following indicators should be set and measured: reduction in all types of pollutant (including PM 2.5, PM10 and NO₂), reduction in illness due to polluted air (consider alongside this measurements of use of healthcare services), reduction in deaths due to polluted air, reduction in pollution blackspots.

While comparative data are useful, particularly for learning from and sharing good practices, it is not sufficient to benchmark Ireland in comparison to other countries as a sign of successes; rather, we need to meet ambitious targets and have performance set against meeting those targets for better clean air to secure a sustainable and healthy future.

Specifically, the Strategy will need highly specific, measurable objectives and outcomes, activities and resource inputs to achieve same. A clear monitoring and impact framework must be available to ensure that the goals of the Strategy are on track, to enable course correction over the course of the Strategy and to ensure that the time and resource commitment to achieving the Strategy are being put to efficient and effective use. It should also keep track of the consistency and coherence in working towards clean air through Government policy and Government funded initiatives and projects.

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

Health benefits should be front and centre of the response to polluted air, reducing harm (e.g. cases of lung cancer and other illnesses) should be a leading goal of the Strategy.

The Strategy should make a firm commitment to adopt, at the very least, the WHO guideline limits rather than state that it will take WHO air quality guidelines into consideration when setting more stringent legal limits for ambient air quality. Improvements in air quality will be welcome, but it is important to acknowledge that there is really no safe level of air pollution.

Air quality and sustainable climate goals should be mainstreamed into all Government policy and (funded) activities and projects, etc. to ensure a collective policy effect and to demonstrate that the State is leading from the front.

People may be afraid of the cost of action to change their behaviours to ensure clean air. But air pollution is also costly. As such, it is important to foster an enabling environment, such as ensuring that individuals and businesses have the resources and viable alternatives in order to make environmentally sustainable choices, e.g. alternative modes of transport, availability of grants for training/retraining.

Irish Cancer Society contact information

For any questions concerning the Irish Cancer Society's response to the Clean Air Strategy consultation please contact:

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