



Irish Rural Link
Nasc Tuaithe na hÉireann

Submission to Clean Air Strategy

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Contact



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Rialtas na hÉireann
Government of Ireland

Overview

Irish Rural Link (IRL) is the national network of rural community groups, representing over 600 groups and thousands of individuals committed to socially, environmentally and economically sustainable rural communities.

We welcome the opportunity to make a submission to the consultation on the Clean Air Strategy. IRL understand the need to improve air quality and people's health and that by moving away from the use of solid and fossil fuels to heat homes and fuel our transport system will contribute to cleaner air. However, a balance is needed to achieve this. Measures introduced to improve air quality must not negatively impact on people, especially those who are unable to, financially or otherwise, make the changes needed to their home heating systems and transport. These households must be supported to make the necessary changes and not penalised further for using pollutant fuels when the alternatives are not available or affordable to them.

The majority of houses in rural areas and even in some of the larger towns outside the major cities do not have access to renewable or cleaner fuels, especially older households and those living in older houses are reliant on fossil fuel – turf, briquettes and coal and home heating oil to heat their home. The cost of making the changes or switching to renewable energy sources is beyond the financial capacity of a lot of households IRL welcome the continued supports available, through SEAI grant schemes, to help households make their homes more energy efficient and grants to change to electric heat pumps. However, not every household is eligible for some of these grants such as the warmer homes and the financial outlay to access the deep retrofit grant is too large for many.

The SILC¹ report 2020² (most recent figures available) showed that those at-risk of poverty (13.2% of the population), 21.4% went without heating at some stage during the year while 7.8% were unable to keep home adequately warm. For those in consistent poverty (5%), 45.7% went without heating at some stage during the year and 19.4% were unable to keep home adequately warm.

The following are a number of recommendations on the questions posed in the consultation paper that are most relevant to IRL members that must be considered before regulations are introduced to ensure people are not made worse off.

¹ SILC – Survey on Income and Living Conditions

² CSO (2021) – Survey on Income and Living Conditions (SILC) 2020

<https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2020/>

Q1. Do you agree with the five strategic priorities?

IRL agree with the five strategic priorities outlined in the consultation paper. However, we believe that a greater emphasis must be placed on social inclusion and vulnerable and marginalised groups who will be most impacted to changes needed to improve air quality, such as home heating systems and transport, who will find it more difficult to make the changes. The establishment of a Cross-Government Air Quality Implementation Group must include officials from Department of Social Protection. We would also like a way for organisations representing those living in poverty to be facilitated to feed into this Implementation Group to ensure that people are protected from further fuel poverty.

Promoting and increasing awareness is an extremely important priority but must ensure all engagement is meaningful and reaches those cohort of people that are always the hardest to reach. Key stakeholders must be engaged with on a regular basis with all communication in simple and clear language to make it easier to communicate with their members.

The new Clean Air Strategy must be fully aware of fuel poverty and those households that are currently experiencing fuel poverty and ensure measures developed to not cause further financial difficulties for families.

Q2. Do you feel there are additional strategic priorities which should be included?

The Clean Air Strategy must be aligned with the Sustainable Development Goals and must be inclusive of everyone. This must be one of the key priorities of this strategy. People must be at the centre of this strategy. While improving people's health is one of the key priorities of the strategy, people cannot be pushed further into fuel poverty in achieving this. We understand that for many living in fuel poverty, they are at risk of poor health and poor air quality in their homes due to the type of fuels they use and switching to cleaner and renewable sources of energy and heating will improve air quality. However, for many households on low-income, making the switch to renewables is not affordable or an option for them even with Government grants and supports. Measures set out in the Clean Air Strategy must at the same time reduce and lift people out of fuel and energy poverty.

Q3. How can pollutant emissions data be better used to inform actions at local and national levels?

How the data is communicated is very important. The language used must be simple and easy to understand so that people, especially marginalised and vulnerable groups can make better decisions based on the data. Information events at local level to support communities better understand the data and what changes can be made is a way of using the data but also getting the message to those who are often most impacted by poor quality air and living in fuel poverty.

Q4. What do you feel are the most important current and emerging air quality issues in Ireland that require further research?

For many of Irish Rural Link members there are concerns on air quality but how this can be achieved while not putting households and communities under further financial strain making the changes to renewable and cleaner energy sources. Even with Government grants and supports, many households in rural areas are still financially unable to make the changes to their heating system or transport. The lack of public transport in rural areas means this is not an option for households and depend on the private car.

The Clean Air Strategy must ensure that improvements in air quality can be achieved without putting households under further financial pressure.

Q5. How can we better increase awareness of the health impacts of air pollution?

Those who are most impacted by poor air quality and air pollution are those living in built up areas and poor quality housing with heating systems dependent on solid and fossil fuels. However, it is also these households that are living in or are at risk of fuel and energy poverty. Increasing awareness of the health impacts of air pollution with these cohorts will be important but unless there are measures and supports in place to help them make their homes more energy efficient and less reliant on solid and fossil fuels, there is little advantage to them getting this information.

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

A national clean air awareness campaign must reach those who would be impacted the most by any changes introduced. While in the long-term, households who are living in fuel poverty will benefit not only in terms of health but also financially from cleaner air, making those changes to their homes and transport use is currently not affordable or available to many of these households, even with supports in and grants in place. The campaign must be engaging of those who are often the hardest to reach and done at a local level with measures set out to what changes they can make and supports to help them make changes put in place.

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

The new Clean Air Strategy must be a whole of Government document and set out measures that are inclusive of everyone but that will reach and engage with the most marginalised and vulnerable cohorts of people in our society. These people are often the ones most impacted by air pollution but are also living in or at risk of poverty and fuel and energy poverty. They do not have the financial resources to make the changes needed to improve energy efficiency in their homes or switch to cleaner and renewable energy and fuel resources. They must not be made worse off due to measures introduced in the strategy that may put them under greater financial pressure. These households must be supported first and have access to Government supports and grants to make changes.

Irish Rural Link the Organisation

Irish Rural Link (IRL), formed in 1991, is a national network of organisations and individuals campaigning for sustainable rural development in Ireland and Europe. IRL, a non-profit organisation, has grown significantly since its inception and now directly represents over 600 community groups with a combined membership of 25,000.

The network provides a structure through which rural groups and individuals, representing disadvantaged rural communities, can articulate their common needs and priorities, share their experiences and present their case to policy-makers at local, national and European Level.

Irish Rural Link is the only group represented at the national social partnership talks solely representing rural communities' interests.

'Our vision is of vibrant, inclusive and sustainable rural communities that contribute to an equitable and just society'

Irish Rural Link's aims are:

- To articulate and facilitate the voices of rural communities in local, regional, national and European policy arenas, especially those experiencing poverty, social exclusion and the challenge of change in the 21st century.
- To promote local and community development in rural communities in order to strengthen and build the capacity of rural community groups to act as primary movers through practical assistance and advice.
- To research, critique and disseminate policies relating to rural communities including issues such as sustainability, social exclusion, equality and poverty
- To facilitate cross-border networking between rural communities

'Our mission is to influence and inform local, regional, national and European development policies and programmes in favour of rural communities especially those who are marginalised as a result of poverty and social exclusion in rural areas.'