



Irish Thoracic Society submission to the public consultation on the Clean Air Strategy for Ireland (2022)

The Irish Thoracic Society (ITS) is the representative body of respiratory healthcare professionals in Ireland. As a charity, we are dedicated to the protection and the promotion of lung health in Ireland and clean air is fundamental to this. Our work in the area of air quality includes submissions to previous national consultations and participation in the LIFE EMERALD (Emissions ModElling and FoRecasting of Air in IreLanD) project, that aims to improve air quality information and awareness. We were closely involved in the national indoor smoking ban and are dedicated members of the European Respiratory Society and European Lung Foundation. Furthermore, we are a founding member of the Irish Lung Health Alliance which has campaigned on this topic. Therefore, this public consultation on the draft Clean Air Strategy for Ireland is of immense interest to our society and community.

Air pollution in Ireland has direct and indirect health and economic costs. It is a contributory factor in approximately 1,400 premature deaths per year in Ireland and has an estimated annual economic cost of 2-2.3 billion euro². Indoor and outdoor air quality has been linked to acute and chronic respiratory conditions including asthma, chronic obstructive pulmonary disease (COPD) and lung cancer. Air pollution exposure can lead to objective reductions in lung function, increased respiratory tract infections and the exacerbation of respiratory conditions. Furthermore, children are particularly vulnerable to the harmful effects of air pollution, as their lungs are immature, and this can result in lifelong health implications. Therefore an ambitious Clean Air Strategy for Ireland could have tangible beneficial clinical and economic consequences.

Air pollution and climate change are inextricably linked, and the importance of these has been emphasised by recent global events. The COVID-19 pandemic highlighted the vulnerability of lung health and the indisputable link between climate change and the risk of zoonosis. This underscored the urgent need for global collective change to address climate change and to protect air quality. Furthermore, recent geopolitical events have emphasised our overreliance on external sources of energy and the importance of investment in local renewable sources of energy. It is often quoted that 'it is important never to waste a crisis' and these events should be considered opportunities to invest in climate positive progress and to prioritise air quality.

The draft Clean Air Strategy outlines the strategic priorities of the Department of the Environment, Climate and Communications to improve air quality, to increase awareness of the importance of clean air and to enhance research in this area. Additionally, it outlines the requirement to integrate the Clean Air Strategy into government policies and the importance of regulation and enforcement of the strategy. Clean air is essential for lung health and the ITS is fully supportive of the strategic priorities contained in the Clean Air Strategy.

We offer the following feedback:

- We welcome the government's decision to use the more stringent legal limits for ambient air quality in line with the new World Health Organisations (WHO) Air Quality limits as the basis for the draft Clean Air Strategy, rather than EU standards¹. We believe where possible, Ireland should attempt to exceed international standards and lead the way in the protection of ambient air quality.
- A robust regulatory framework is necessary to facilitate the implementation, monitoring and enforcement of the important measures to protect air quality.
- The implementation of this regulation will require a public awareness campaign to highlight the immediate and long-term health, environmental and economic benefits of the proposed new regulations. This could engage important stakeholders such as the ITS and other health and patient charities that are passionate about air quality, health and the environment and have a track record in the promotion of same. Awareness campaigns should focus on the general population and physicians who manage the complications of poor air quality including pulmonologists, cardiologists and stroke physicians could play a key role. This could include patient case studies and medical testimonies regarding the importance of air quality for health. Education around valuable tools such as the Air Quality Index for Health would also be beneficial for the general public, patients and physicians.
- We commend the government on its attention to the importance of a just transition to sustainable energy infrastructure in this draft strategy. This requires additional investment in order to protect vulnerable populations. Programs that provide financial support for the use of green energy sources should be expanded. Additional safe cycle ways should be developed, and non-essential traffic should be diverted away from urban areas where feasible following in the footsteps of large cities such as Paris. Biodiversity and other important environmental measures should be encouraged and funded.
- Research initiatives that support the study of air quality, climate change and the health and economic consequences in Ireland should be expanded. This should include clinical and translational research in areas of clinical medicine that are

impacted by poor air quality, including the respiratory system which is particularly vulnerable to the harmful effects of air pollution.

The government's intentions to prioritise clean air with this new strategy are timely and commendable. If ambitious targets are set and achieved, Ireland will serve as a model for other countries to follow.

Regards,

[Redacted]

[Redacted]

Contact information:

Name: [Redacted]

Work address: Centre for Lung Health, 56 Eccles Street, Mater Misericordiae University Hospital, Dublin, Ireland

Telephone: + [Redacted]

Email: [Redacted]

References:

1. Ambient (outdoor) air pollution. World Health Organisation. 22 September 2021. [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)
2. Draft Clean Air Strategy- Public Consultation on the Clean Air Strategy for Ireland. Department of the Environment, Climate and Communications, Government of Ireland. Published online on 7 March 2022; <https://www.gov.ie/en/consultation/0a7cf-consultation-on-the-clean-air-strategy-for-ireland/>