



Rialtas na hÉireann
Government of Ireland

Public Consultation on the National Clean Air Strategy

Individual Submissions

August 2022

Introduction

A public consultation on the draft National Clean Air Strategy took place from 7 March to 3 May 2022.

Development and publication of the Clean Air Strategy is a commitment under the Programme for Government, and the purpose of the Strategy is to outline how we will enhance and protect the quality of the air that we breathe and realise the full environmental and health benefits of cleaner air.

The draft Clean Air Strategy sets out the high-level strategic policy framework necessary to identify and promote the integrated measures across government policy that are required to reduce air pollution and promote cleaner ambient air while delivering on wider national objectives. The key strategic priorities outlined in the draft Strategy which was the subject of public consultation are:

- To ensure continuous improvements in air quality across the country;
- To guarantee the integration of clean air considerations into policy development across Government;
- 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;
- To enhance regulation and improve the effectiveness of our enforcement systems;
- To promote and increase awareness of the importance of clean air.

There were two main strands to the public consultation:

- Online Questionnaire
- Email submission

This document provides a copy of the text email submissions.

The main technical submissions are published separately and are available at

<https://www.gov.ie/en/consultation/0a7cf-consultation-on-the-clean-air-strategy-for-ireland/>

Hello,

Hope all is well. I would like to take this opportunity to submit my views on the Clean Air Strategy as part of the recently opened consultation process.

I agree that there is a need to regulate for clean air for the people of Ireland, but it must include a well-rounded approach.

One aspect which I feel needs to be addressed from the outset, is the continued reference of sod peat in the consultation document. In Ireland, we burn turf domestically, not sod peat. This needs to be clarified and corrected moving forward.

On the subject of turf, I welcomed the fact that there was a commitment that no ban on turf cutting would be enforced. However, I believe now is not the time to prohibit the sale turf to those in urban areas who may not own a bog. There are some instances where people in urban areas do own their bog, so they should be allowed to continue as normal.

But in other instances, it is common for families in urban areas to rent plots to rear and harvest turf themselves, or purchase loads of turf. This practice has been common for generations. Even though these people may not have a turbary right to a bog, they still have been involved in the culture and tradition of the practice for many years.

What's more, turf is a viable source of fuel for middle to low income families where home heating oil or gas is too expensive to run 100% of the time. Many people have solid fuel stoves or ranges in their kitchens or sitting rooms, which they burn turf in to limit the spending on oil and gas. Or some may be totally dependent on solid fuel such as turf.

With the cost of living spiralling in recent weeks, middle to low income families need the option of an alternative to oil or gas. Maybe in 10 to 15 years' time, new technologies or renewable energies will be in a position to entirely take over, but that is not the case at present.

Anyone who cuts and saves turf recognises the necessity for it to dry and season in the bog, before being stored away and protected from the elements. This allows for a period of six months or more for it to dry, which dramatically reduces its moisture content level.

The same must be said for timber, anyone with common sense would never burn wet timber. Timber is left to season the same as turf for a number of months before it is burned. Otherwise, the heat value is greatly diminished, there is excess smoke and it can damage chimneys. However, I have concerns around how the moisture content level of turf or timber could be policed or monitored. Do we expect people to go out and purchase moisture meters? Or do we trust them to act responsibly?

The civil unrest in the Ukraine as a result of the invasion carried out by Russia has already had huge

impacts globally. We have seen the price of fuel and oil skyrocketing. It has been confirmed today that the State has already been forced to tap into the country's 90-day reserve of crude and refined oil due to demand domestically. This all points to a deepening crisis where we shouldn't limit people's options when it comes to the type of fuel they can burn in their home.

With regards to Bord na Mona, I fully believe that the power plant in Edenderry must be continued to allow to burn peat to generate electricity until 2030. As mentioned previously, the security and reliability of our energy supply is no certain thing and we cannot depend on promises or hopes that technologies will be in place in time or that renewable energy will meet the targets aimed for to replace our traditional methods of generating electricity.

While the clean air strategy is important, we cannot forge ahead with a plan which will leave us exposed in so many other areas at such a vulnerable time.

Kind Regards,

[Redacted]

Office of:

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Tel: [Redacted]

Mob: [Redacted]

[Redacted]

Beartas ríomhphoist an Oireachtais agus séanadh. oireachtas.ie/ga/email-policy/

Oireachtas email policy and disclaimer. oireachtas.ie/en/email-policy/

Email 2

24/03/2022

Ireland needs to focus on getting everyone on public transport first to start getting rid of greenhouse gas emissions.

We need to move away from cars and move people to getting the bus, the Luas, the Dart and the train.

Ireland can no longer sustain such a high amount of cars on it's roads. They pollute the air with nitrous oxide, carbon dioxide and a lot of other very harmful gases.

A move to electric cars would be welcome as well but in the end a move to public transport would be more beneficial for all of us.

■■■■

Email 3

24/04/2022

Dear reader,

It is imperative that the government take strong action to protect public health by tackling air pollution from dirty fuel sources.

To achieve this an urgent move away from the use of combustion engines in transport and solid fuels for heating is required. This must be done at scale.

The government needs to be brave and not continue kicking the can down the road on preventative health interventions.

Kind regards,

[REDACTED],
[REDACTED],
[REDACTED],
[REDACTED] |

Email 4

26/04/2022

To: Air Quality Division

Please accept this as my submission about air quality.

Dear Minister Ryan and the Government

- ✓ **Right to Breathe Clean Air:** the right to breathe clean air should be the central guiding principle for the National Clean Air Strategy.
- ✓ **Clean > Cleaner:** In accordance with the World Health Organisation, the aim of the Strategy should be revised to **deliver "clean" air rather than "cleaner" air.**
- ✓ **A Whole of Government Approach:** the Strategy should be placed on statutory footing to ensure a whole-of-government approach and enhanced policy coherence.
- ✓ **World Health Organisation (WHO) Air Quality Standards 2021:** the Strategy should set out a path for Ireland to adopt WHO standards for air quality by the end of 2022 at the latest.
- ✓ **Improved Specificity:** the Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner.
- ✓ **Monitoring and Accountability:** The Strategy should be revised to include clear monitoring and accountability mechanisms that are measurable, actionable and time-bound.
- ✓ **Research Inequality:** The Strategy should map out a research plan to examine how air pollution impacts certain vulnerable and marginalised groups, such as members of the Traveller community, low-income households, people with disabilities, people with respiratory conditions, those who experience energy poverty, and children.
- ✓ **Address Inequality:** the Strategy should identify measures to (1) engage with impacted communities on air quality issues and (2) adopt appropriate supports for impacted communities to ensure that action to address air pollution across Ireland is both inclusive and fair.
- ✓ **Disseminate Data:** the Strategy should require public bodies and local authorities to provide real-time localised air quality information as part of a national awareness campaign.
- ✓ **Adopt a New Clean Air Act:** provide greater powers to local authorities to deal with air pollution issues, as well as enhanced access to justice provisions for individuals and organisations.

Yours faithfully,

[Redacted signature block]

Ireland

Tel. No. + [Redacted]

I don't expect a response to any message outside your normal working hours!

Email 6

27/04/2022

Submission:

I agree with the five strategic priorities outlined but feel that none of these headings address health issues strongly enough.

I understand that most if not all cover health impacts of air pollution but surely the word HEALTH should be more visible in one of the priority headings. Number 5 might be the best FIT.

As a person who has suffered from Asthma for over 40 years I feel the impacts of air pollution first hand. My condition like most asthmatics is controlled by drugs but when placed in a situation where exposed to high levels of emissions such as a busy road in urban areas where the air quality is very poor or in the country, when exposed to manure that has not been collected and stored properly, Manure and urine together cause emission of Ammonia a corrosive gas which causes irritation of eyes, throat and lung damage, asthma and sometimes can cause death. A simple solution of flushing helps to reduce emissions from the barn, eliminating their negative effects.

Grass cutting by the ordinary gardener is another problem for asthmatics if not collected and disposed of correctly.

A difficult task to track the progress of a Clean Air Strategy. A comparison might be drawn to the time of the first lockdown when there were very few cars on the road, Industry and building developments had come to a standstill and flights were halted. We all walked or cycled every day and enjoyed the birds singing like they hadn't sung for years.

For the first time for as long as I can remember we could breathe clean fresh air.

Warm Regards

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██

Email 7

27/04/2022

Where is the science covering burning dry wood in a modern wood burning stove to continue for home heating into the future with moderate usage within a well insulated home As an allowable heat source within the constraints of zero emissions targets

The retro fitting programme seems more focussed on doing the most costly work to achieve a home bubble which is often negated by how the bubble is frequently opened for human and pet access The heat pump is most inefficient when most needed. Ie when air temperatures are low air to air is more efficient and less costly yet not promoted

The expense and use of work time and materials to achieve excessively high b rating is not justified and promotes a way of living in the home that reduces human tolerance of any levels of heat or cold

A more productive approach would be to give householders free solar panels combined with a progression of insulation levels after establishing a mandatory but moderate basic level of insulation to get the free panels that would be of size to cover some heating of water and space and other normal domestic use individuals could add panels at their own expense A smart meter being obligatory to promote responsible usage

This would be a clear replacement for turf and oil users

Email 8

27/04/2022

We have been encouraged by An Taisce to submit my family's experiences & views on the above , when living on a VERY MAIN ROAD dissecting our village community.

Innishannon Village is traversed by the N71 important thoroughfare (Cork - WestCork (Bandon,Clonakilty,Bantry etc).

Current ,uncorroborated , statistics estimate a daily level of approx 35,000 vehicles passing through the village....ie 17,500 in each direction!! At present there has been no publicly announced information on the exact average Co2 pollution from the resultant fuel emissions.

Regulations should be made ,to the relevant local authority ,(Cork County Council,in our case) so that Rural Communities can be regularly informed of the current degree of pollution brought about by " passing through" traffic. This traffic in effect just causes local health damage whilst serving ABSOLUTELY NO BENEFIT WHATSOEVER TO OUR VILLAGE.

For over 30 years we have requested a village bypass . This request has, in effect ,so far been totally ignored.At some stage ,approx 25 years ago!! We were promised that "...when Youghal,Ballincollig& Macroom bypasses had been completed...we would be next"....

Both Youghal & Ballincollig bypasses have long been completed & at last, after considerable delays, the Macroom bypass is now well underwaybut somehow ," maybe conveniently forgotten, there's absolutely NO MENTION NOW OF AN INNISHANNON BYPASS. (Which with planning could be done in a fairly short period of time).

From an historic point of view: our Main Street was widened originally in the 1700's by Thomas Adderly ,who was also responsible for the " wide streets' of Dublin....when he set up" The Wide Streets commission".

It is totally unsuitable for its current traffic volume....with numerous++++ large " belching " lorries ?? . Several Heritage properties on the street are being affected on an ongoing basis by the regular "shuddering " caused by these vehicles.

There is no main gas pipeline supplying gas into our village. Inevitably ,with many old properties ,there are many open house fires in the areaso wood & peat are both burnt locally (& probably coal in some properties) . The sole alternative is electricity (at its extremely exorbitant rates) . It is possible (like Bandon) that a local hydroelectric system could be developed ,for our community electricity needs, as parallel to the Main Street there is ,at times, the fast flowing River Bandon.

Yrs etc [REDACTED]

Sent from my iPad

Email 9**27/04/2022**

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it concerns,

As a business owner, resident of Dublin 8, and professional designer with specialisms in urban design and local government. I would like to provide my input in relation to the "Draft Clean Air Strategy". The following actions, as part of the strategy, and advocated for by An Taisce, have my full support.

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

Subsidise and Improve Public Transport

We need to make public transport a better alternative to the private car through subsidising and improving the network.

Invest in Alternatives to Air Travel

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

Additional, personal contribution:

As a resident of an urban area, indeed potentially the most dense urban area in the country, I cannot see how an air quality strategy can succeed without close connections to transport strategy and road traffic law enforcement. Our neighbour hood and street is plagued by:

- Illegal 5 axle HGVs traversing the city without permits
- Speeding cars, breaking the 50km/h speed limit, which should be reduced to 30km/h but is not enforced
- Idling delivery trucks, often obstructing bus and bike lanes, or footpaths, and impeding active mobility.

It is necessary for this to be a whole-of-government effort, and the Justice Department must be engaged to ensure that An Garda Siochana enforce the law in our urban areas.

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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Context Studio: [REDACTED]

Blog: [REDACTED]

Email 10

27/04/2022

I feel that this is such an important issue, but it is being politicised and made into a rural/urban argument. I live in a village and sometimes the air when it is cold is so smoky I struggle to breathe properly. I don't understand how whether we should have clean air or not is up for debate.

I think the government should:

1. Legislate for WHO Air Quality limits by 2025
2. Improve public transport so that more people want to use the bus. This needs dedicated bus lanes and more bus shelters. And this needs to be done now, not just before 2050.
3. Subsidise partially or fully for people to retrofit their homes so they don't need to burn solid fuel.

Then you can ban solid fuel without people going cold. You can already ban smoky fuel, as people can still burn dry wood. A lot of people burn coal & peat who live in homes that have gas central heating.

Regards

■■■■ ■■■■

Get Outlook for Android

Email 11

28/04/2022

Hi,

The building industry is responsible for 39% of our CO₂ emissions . Yet we never hear a single word about it .KINDLY start to draw public attention to this as well as take some action .Cars seem to be the soft option ... however they are not the sole problem .

Please take action .

Thank you . , very disappointed citizen .

Email 12

29/04/2022

Hi,

I am writing in relation to the draft clean air strategy.

I would like to raise the following points:

We need to more specific and ambitious with the targets. We should be legislating for the new WHO air quality limits.

As an adult with Asthma who lives in Sligo I am very concerned about solid fuel emissions. There needs to be clear messaging about the harms which solid fuel emissions cause and there needs to be targeted support for a move away from burning solid fuel.

Kind Regards,

[Redacted signature block]

This e-mail is subject to the following disclaimer available [Redacted]

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The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

Email 14

30/04/2022

My view is that public transport transport should be improved and subsidised (more).

Also insulating homes and replacing heating systems should be prioritised. I am glad to see that some progress is being made in this regard but there is a danger that it may fall behind schedule.

Yours

Email 15

30/04/2022

submission on clean air strategy:

1 - People cannot be left without access to fuel in the winter, and it is incumbent on the Government to ensure that that does not happen.

2 - Building windfarms in peatlands is counter productive, as the amount of peat extracted for the base of a single turbine is extortionate.

Bogs are carbon sinks, they cover 3% of the world's land surface but store at least twice as much carbon as all Earth's standing forests.

Would it be acceptable to cut down the rain forests and replace it with a windfarm?

3 - How can the government propose banning the sale of turf to small holders, while semi state companies such as Bord an Mona are planning such destruction (by the construction of wind-farms) on our remaining bogs.

Where is the Social Justice and "Just Transition" for the communities around the bogs?

■■■■ ■■■■

Email 16

30/04/2022

A Chara,

Regarding your attempts to come up with a strategy for clean air , it is far too weak and does not encompass even half of the issues .

The North Runway Project should be dropped right away ... I thought this was attempt to REDUCE pollution ? Not increase ?? Need I say more ?? Discouraging flying is what should be happening , if you actually are serious about this issue . Increase flight charges , enormous pollution tax on flights is long overdue .

No mention has been made about the fact the building industry is responsible for 39% of our emissions ... action required please and NOT keeping this secret .

Shipping is 2nd only to aviation when it comes to CO2 emissions ... and is far higher than cars , yet this is never addressed...

I am a hugely frustrated and disappointed voter and feel very let down by those I voted for. I had hoped they might have a small bit of integrity, speak out and do the right , honest thing .

Email 17

30/04/2022

Hi there,

I just want to lend my voice a citizen concerned about the air pollution, my family lives in Cork city. 3 of my family are affected by asthma and there is a noticeable increase in symptoms when atmospheric pressure is low. My children cycle to school and have to gulp in the fumes of idling heavy vehicles in the morning traffic, they often complain it makes them choke. I wish cyclists could have clean safe routes away from the main thoroughfares. I'm often shocked by the general smell of fumes in the city, it's particularly noticeable whenever I've been away. We owe it to the health of our citizens present and future to set and enforce limits on pollution.

Thanks,

■■■■ ■■■■ ■■■■

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

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Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

Dear Minister Ryan and The Government.

I am writing to express my support for the Community Law and Mediation's (CLM) Centre for Environmental Justice in relation to the National Clean Air Strategy.

The CLM believes that it is imperative that air quality in Ireland be tackled in a systematic manner, ensuring that the National Clean Air Strategy (henceforth, "the Strategy") protects the right to breathe clean air, while also delivering on Ireland's obligations under the Aarhus Convention and the Sustainable Development Goals.

CLM therefore recommends the following:

1. Right to Breathe Clean Air: the right to breathe clean air should be the central guiding principle for the National Clean Air Strategy.
2. "Clean" air as the stated aim: in accordance with the World Health Organisation guidelines, the stated aim of the Strategy should be revised to ensure that it aims to deliver "clean" air rather than "cleaner" air.
3. A Whole of Government Approach: the Strategy should be placed on statutory footing to ensure a whole-of-government approach and enhanced policy coherence.
4. World Health Organisation (WHO) Air Quality Standards 2021: the Strategy should set out a path for Ireland to adopt WHO standards for air quality by the end of 2022 at the latest.
5. Improved Specificity: the Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner.
6. Monitoring and Accountability: The Strategy should be revised to include clear monitoring and accountability mechanisms that are measurable, actionable and time-bound, with a view to ensuring policy coherence and protecting citizens' rights under the Aarhus Convention.
7. Research Inequality: The Strategy should map out a research plan to examine how air pollution impacts certain vulnerable and marginalised groups, such as members of the Traveller community, low-income households, people with disabilities, people with respiratory conditions, those who experience energy poverty, and children.

8. Address Inequality: the Strategy should identify measures to (1) engage with impacted communities on air quality issues and (2) adopt appropriate supports for impacted communities to ensure that action to address air pollution across Ireland is both inclusive and fair.
9. Dissemination of Data: the Strategy should require relevant public bodies and local authorities to engage in greater public dissemination of real-time localised air quality issues as part of a national awareness campaign.
10. Adopt a New Clean Air Act: CLM recommends the replacement of the Air Pollution Act 1987 with a new Clean Air Act which would consolidate existing legislation relating to air pollution.

This new Act would provide greater powers to local authorities to deal with air pollution issues, as well as enhanced access to justice provisions for affected individuals and organisations.

Kind regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

T: + [Redacted]

E: [Redacted]

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If you receive this email outside of your normal working hours, you are not expected to respond until you return to work.

Registered Charity Number: [Redacted]

Email 20

30/04/2022

Thank you for the opportunity to make a submission regarding the Clean Air Strategy.

I would urge the government to prioritise the following in the plan:

- * legislate for WHO Air Quality limits by 2025 at the latest.
- * create low emission zones in our cities
- * introduce congestion charges and restrict heavily polluting vehicles from cities
- * prioritise active travel, which improves air quality, by improving and extending the cycling infrastructure in the city making it safe and accessible to all ages and abilities. This means the infrastructure needs to be a linked up network, not small sections as currently.
- * Pedestrianise more of our city centres and develop public spaces for pedestrian use
- * subsidise and improve public transport. Lower fares and improve connectivity. Invest in more electric/hydrogen powered buses and trains
- * invest in alternatives to air travel and stop subsidising airline fuel and air routes
- * support farmers to reduce ammonia emissions
- * expedite and incentivise retrofitting for those most impacted by the necessary move away from solid fuel burning for home heating. We cannot leave people without a viable alternative.

Alternative heating sources need to be available when solid fuel is banned. And this cannot be an excuse for any further delay. We are in an emergency.
- * start larger scale investment in whole-community infrastructure such as solar panels on all south facing roofs of towns, incentivising retrofitting whole terraces at once, for example.

Kind regards,

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To whom it concerns,

I support the following for the clean air strategy. Climate, health and a just transition must be central.

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Yours, [REDACTED] [REDACTED]

Email 22

30/04/2022

To whom it may concern,

I support the following recommendations from An Taisce. Please take account of same.

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(1) EPA, Air Quality in Ireland 2019

You can support An Taisce's work by becoming a member. Join Today!

Further Explanation

What value does my input have in this process?

The Government's Plan is currently at draft stage, and it is open to public consultation until Tuesday, 3 May. The Plan falls far short of its potential, and misses the opportunity to fundamentally transform our emissions. Simply put, the Government needs to be told that the people expect better, more far-reaching solutions, backed up by legislation and with specific timelines for action. If enough people make their voices heard, the Government will be left with no choice but to redraft the Strategy, and give us the Clean Air roadmap we all deserve.

In the next section, we've laid out more detail on our recommendations for Clean Air, to help you with your submission.

Make your own submission by writing an email to: airquality@decc.gov.ie with the subject line: Clean Air Strategy Public Consultation, before Tuesday, 3 May.

What would a good Clean Air Strategy look like?

The Strategy should lay out a road map for achieving major reductions in air pollution from the main sources of pollution. They are: Transport, Home Heating, and Intensive Agriculture. In general, the

Strategy should:

Recognise the Right to Breathe Clean Air

The Clean Air Strategy should explicitly recognise that every person in the country has a right to breathe clean air.

Legislate for World Health Organisation standards

Ireland's air pollution levels are dramatically higher than the safe levels that the WHO has identified. The government should commit to introducing legislation setting out a legislative path to getting Ireland to WHO standards by 2025 at the latest. The legislation should be completed this year.

Be more specific! The Draft Strategy includes some very ambitious rhetoric, but it is light on detail. The Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner. This should include specific timelines, detailed targets, and clear implementation plans for each major sectoral area.

Transport

* Legislate for Low Emission Zones in our cities

Low Emission Zones are crucial in reducing the air pollution impact of transport. Our city-centres should be designated as Low Emission Zones. This means that heavily polluting vehicles would be restricted from access to the Zone, and congestion charges would be applied. They have been successfully implemented in many European cities, including Paris, Amsterdam, Brussels, London and more. In London, air pollution reduced by 44% in 3 years, largely due to the use of Low Emission Zones.

* Active Travel Revolution

We should be moving much faster to encourage people to use active travel instead of private cars. This involves acceleration of cycling infrastructure projects, pedestrianisation of roads, and the introduction of grant schemes for electric bikes and scooters to make them more accessible for as many people as possible. Speed limits 30kph default all built up areas.

* Invest in Alternatives to Air Travel

We are in a climate crisis. Despite this, the Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have

serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government and investment should be put into alternative modes of transport and integrated infrastructure like ferries and trains.

Agriculture

* Reduce Ammonia Emissions

Agriculture is the main source of ammonia emissions in Ireland. Ammonia is very dangerous for human health, and a major problem for climate. Ireland is far above the legal limits for ammonia pollution, and has been the subject of complaints by the European Commission. According to the EPA, the cause of our spiralling ammonia emissions is primarily the increase in cattle numbers.

* Fund the Just Transition for Farmers

Principles of Just Transition should be at the heart of reforms for agriculture, supported by appropriate funding. A fund should be created to support farming communities in their transition from intensive agricultural output to more sustainable modes of production and activity. Crucially, our national agricultural policy means that most farmers have little choice but to increase the intensity of their output. The Government needs to address this, and incentivise farmers to reduce intensity and increase diversity on their lands.

* Learn from Other Countries

In 2020, the United Kingdom published its air quality plan, which includes plans to cut ammonia emissions from agriculture by 16% by 2030. At the end of 2021, the Dutch government published a €25 billion plan to reduce livestock numbers by up to 33%, including compensation schemes for farmers, and supporting the transition from intensive to extensive farming methods. This scale of ambition is absent in Ireland.

Home Heating

* Coherent Plan for Transitioning Away from Solid Fuels

In 2021, the Government announced its new Solid Fuel Regulations. The Regulation of solid fuel is very important - 55% of particulate matter pollution in Ireland comes from houses burning solid fuel.

However, there is a lot of confusion around the plan to phase out reliance on turf burning in Ireland.

The government should develop a coherent plan for the rapid transition away from turf burning, with a specialised and expedited stream, of the retrofit scheme designed to help those reliant on turf to move away from its use as quickly as possible. People cannot be left without access to fuel in the winter, and it is incumbent on the Government to ensure that that does not happen while also protecting our peatlands.

* "Natural" Gas is Not the Answer

There has been a rapid increase in reliance on natural gas in Ireland in recent years, instigated by Government policy. Gas is a fossil fuel, and its primary component is Methane. Methane has a global warming potential 21 times higher than carbon dioxide over a 100-year period, and methane leaks from extraction and transportation of natural gas are a significant problem. Continued reliance on natural gas in Government policy is a recipe for climate catastrophe. Instead, the Clean Air strategy should reaffirm a strategy for renewable energy production in Ireland.

Yours sincerely,

■■■■■■■■■■

Submission

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

Subsidise and Improve Public Transport

We need to make public transport a better alternative to the private car through subsidising and improving the network.

Invest in Alternatives to Air Travel

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

Kind regards,

■■■■ ■■■■

An Taisce Council

Email 24

30/04/2022

Hi there

Here are the priorities I'd like to see in the Clean Air Strategy:-

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

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The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

Support Farmers to Reduce Ammonia Emissions

Email 25

30/04/2022

A chara, please reduce air travel by providing more ferries and trains and encouraging people to holiday in Ireland. Reduce the number of petrol vehicles in town centres and ammonia emissions due to too many cattle. Clean air is vital for our health and these measures would also reduce climate change.

Thankyou.

■■■■ ■■■■

Email 26

30/04/2022

Hi

I would like to contribute to the government's plans for a clean air strategy

PI Legislate for WHO Air Quality limits by 2025

1. Please legislate for the WHO Air Quality limits by 2025. They are linked here: WHO Air Quality

Guidelines. These guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

2. Create low emission zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

3. Change the way we travel in Ireland

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

4. Subsidize public transport more

We need to make public transport a better alternative to the private car through subsidising and improving the network.

5. invest in alternative to Air Travel and stop new runway development in Dublin airport

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

6. support farmers to reduce ammonia emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

7. Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email 27

30/04/2022

Dear sirs

I wish to respond to your consultation document with the following proposals:

WHO Air Quality limits

We should at least comply with these international standards as a matter of urgency

Establish Low Emission Zones

Even though I drive a diesel car,I recognise that we need to disincentives its use in built up areas.

Cycling as an alternative safe way to commute.

The great majority of car journeys can be replaced with a bike . But this will not happen unless their is a concerted and concentrated set of policies implemented to make that use save and comfortable.

There will be objections. The answer to those objections is that without the necessary changes,more people will die from bad air.

Public Transport

Public transport must continue to improve. There have been great improvements. The quality and extent of the bus network has greatly advanced. Much more must be done especially in rural areas so that it becomes a real alternative to the car .

Alternatives to Air Travel

We need better ,more frequent and faster ferries to bring us to the continent .

Fertilizers

The war in Ukraine has shown the folly if relying overly on artificial fertilisers which consume vast quantities of energy and give rise to dangerous emissions. Pay farmers to learn about and use

alternatives.

Smoky fuels

The challenges to the modest efforts of the government to deal with smoky fuels must not deter it from moving ahead . It is only a small minority who are being used as a lever to disrupt this policy.

I like to burn turf and respect its aroma and tradition. But it is a tradition that is no longer compatible with our obligations to the health of our people and planet.

■■■■

Email 28

30/04/2022

Please note the following concerns I hold regarding clean air strategy;

It is vital that people cannot be left without access to fuel in the winter, and it is up to our Government to ensure that that does not happen, what alternatives are being offered to turf burning and how long will alternative forms of heat take to roll out across the country? it is not something that can happen within 1 year, this needs vast research and practical solution's.

Building windfarms in peatlands is absolutely counter productive, as the amount of peat extracted for the base of a single turbine is extortionate.

Bogs are carbon sinks, they cover 3% of the world's land surface but store at least twice as much carbon as all Earth's standing forests.

Instead of this we should be harvesting the bogs with extra plantations to absorb even more carbon as a lot of European countries are doing. The bogs are a non-renewable source of carbon storage and distributing them to pour in tons of concrete as turbine foundations would be absolutely reckless in terms of carbon release into the air. Also those turbines set off a different type of pollution in the form of noise which is detrimental to humans, animals and birds.

It seems crazy that the government could even consider banning the sale of turf to small holders, while semi-state companies such as Bord an Mona are planning such destruction (by the construction of wind-farms) on our remaining bogs.

Please take into consideration the above points as part of your public consultation.

Thank you

██████████

Email 29

30/04/2022

To whom it may concern

I wish for the Irish Government to adopt An Taisce's Key Recommendations for a Clean Air Strategy. These are outlined below:

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

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We need to make public transport a better alternative to the private car through subsidising and improving the network.

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Support Farmers to Reduce Ammonia Emissions

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(1) EPA, Air Quality in Ireland 2019

-- [REDACTED] [REDACTED]

[REDACTED] [REDACTED], [REDACTED]

[REDACTED]

Ph: + [REDACTED]

Email: [REDACTED]

Email 30

01/05/2022

HELLO,

I wish to make the following points for the consultation

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(1) EPA, Air Quality in Ireland 2019

Kind Regards

Email 31

01/05/2022

Hello

The fact that a Clean Air Strategy is being developed is a very positive thing and the current draft has much to commend it.

I would like to see more on these areas:

- * We should not be increasing flight capacity at Dublin airport via an additional costly runway. That money should instead be used for public transport and active travel infrastructure.
- o More investment in public transport and active travel infrastructure.
- o More Luas lines, electrification of commuter rail lines, electrification of bus fleets, priority given to buses and cyclists on all urban roads.
- o Expanded and adequately subsidised bike rental schemes.
- o Investment in national rail services including reopening old lines where applicable and where motor travel could be reduced in doing so
- o More bicycle lanes and greenways, prioritisation of pedestrians and cyclists over drivers in all urban areas.
- * Retrofitting of houses where residents rely on coal and peat for home heating should be prioritised. At minimum switch these to wood burning stoves or better.
- * I would like to see the introduction of low emissions zones in cities and towns where only low or zero emissions motorised vehicles are allowed.
- * Helping farmers switch from dairy and beef farming is a priority for a variety of reasons including diversifying our domestic food production, reducing food imports, reducing GHG emissions, increasing plant and tree cover and resulting carbon sequestration.

However doing so can also help improve air quality by lowering ammonia emissions from cattle.

Thanks

[Redacted]

[Redacted]

[Redacted]

Skip over main navigation

*

An Taisce - The National Trust am a member of an Taisce and would like to strongly support am a member of an Taisce and would like to strongly support the recommendations below.

I am a member of an Taisce and would like to strongly support the recommendations below

Best wishes

[Redacted signature]

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What would a good Clean Air Strategy look like?

The Strategy should lay out a road map for achieving major reductions in air pollution from the main sources of pollution. They are: Transport, Home Heating, and Intensive Agriculture. In general, the Strategy should:

Recognise the Right to Breathe Clean Air

The Clean Air Strategy should explicitly recognise that every person in the country has a right to breathe clean air.

Legislate for World Health Organisation standards

Ireland's air pollution levels are dramatically higher than the safe levels that the WHO has identified. The government should commit to introducing legislation setting out a legislative path to getting Ireland to WHO standards by 2025 at the latest. The legislation should be completed this year.

Be more specific! The Draft Strategy includes some very ambitious rhetoric, but it is light on detail. The Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner. This should include specific timelines, detailed targets, and clear implementation plans for each major sectoral area.

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Principles of Just Transition should be at the heart of reforms for agriculture, supported by appropriate funding. A fund should be created to support farming communities in their transition from intensive

agricultural output to more sustainable modes of production and activity. Crucially, our national agricultural policy means that most farmers have little choice but to increase the intensity of their output. The Government needs to address this, and incentivise farmers to reduce intensity and increase diversity on their lands.

* Learn from Other Countries

In 2020, the United Kingdom published its air quality plan, which includes plans to cut ammonia emissions from agriculture by 16% by 2030. At the end of 2021, the Dutch government published a €25 billion plan to reduce livestock numbers by up to 33%, including compensation schemes for farmers, and supporting the transition from intensive to extensive farming methods. This scale of ambition is absent in Ireland.

Home Heating

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In 2021, the Government announced its new Solid Fuel Regulations. The Regulation of solid fuel is very important - 55% of particulate matter pollution in Ireland comes from houses burning solid fuel. However, there is a lot of confusion around the plan to phase out reliance on turf burning in Ireland. The government should develop a coherent plan for the rapid transition away from turf burning, with a specialised and expedited stream, of the retrofit scheme designed to help those reliant on turf to move away from its use as quickly as possible. People cannot be left without access to fuel in the winter, and it is incumbent on the Government to ensure that that does not happen while also protecting our peatlands.

* "Natural" Gas is Not the Answer

There has been a rapid increase in reliance on natural gas in Ireland in recent years, instigated by Government policy. Gas is a fossil fuel, and its primary component is Methane. Methane has a global warming potential 21 times higher than carbon dioxide over a 100-year period, and methane leaks from extraction and transportation of natural gas are a significant problem. Continued reliance on natural gas in Government policy is a recipe for climate catastrophe. Instead, the Clean Air strategy should reaffirm a strategy for renewable energy production in Ireland.

Updated: 27th April, 2022

Email 33

02/05/2022

To whom it may concern,

If we are to improve air quality we need to use less cars. Its that simple. Studies have shown that modal shift away from cars requires both a carrot and stick approach. Enabling cycling and active travel is key.

On the other side, reducing freely available car parking and congestion charges in the city distinctiveness the use of cars.

I live in Dublin 13 and regularly cycle. I find it amazing given there are a number schools, shopping centres, pharmacies, churches that Donaghmede is devoid of any cycle tracks. Similarly, Tonlegee Rd and Oscar Traynor Road are also very poorly served despite being very wide thoroughfares. This is thriving area in the capital and there is a shocking lack of cycling infrastructure. If we can get it right here how can we tackle rural cycling which is arguably more complicated. A recent NTA survey showed that the main reason Dubliners choose not cycle is concern for safety. This is something I have found anecdotally too when asking friends and colleagues why they don't cycle. The prospect of cycling in and around cars, buses and trucks is understandably terrifying to many people.

Please implement polices that can allow us to use less cars. People will not move away from cars unless they are correctly incentivised to do so.

Yours sincerely

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██████████

████████████████████

Email 34

02/05/2022

A Chara,

Regarding the Government's Clean Air Strategy, I think that the current plan is not really ambitious enough.

1. I think that we should have legislation to achieve the WHO Air Quality Limits by 2025.
2. Stronger efforts should be made to have cheaper and better public transport so that more people would opt for it as a better alternative to car usage.
3. Much greater support must be given to farmers to help them to reduce ammonia and to help them to transition to more sustainable farming opportunities. We need our farmers now more than ever. The more self-sufficient we are the better it will be for us all. Look at the sugar beet industry: This was essentially wiped out with a governmental stroke of the pen. No one at the time had the vision to see that it was worth retaining. It would be a tragedy if the current drift away from farming as a career is allowed to continue - that would impoverish us all.

I hope the drafters of the Clean Air Strategy will demonstrate wisdom and vision as well as pragmatism.

Is mise le meas,

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Email 35

02/05/2022

To whom it concerns,

I would like to give my views on the topic, which is very much in focus at the moment.

I believe that air quality in Ireland has improved greatly since the 80's. That is wonderful. I feel that air quality in my area (Cork city) is very good. I base my beliefs on my own experiences: fresh air when I open windows or go outside, an abundance of birds and insects in the gardens, the trees in the garden are covered in lichens which are often a good indicator of air quality. We live on the edge of the atlantic with fresh breezes blowing by frequently so even on a very still, calm, muggy day the air is good.

I can see how someone living in the centre of Dublin, who cycles on roads close to the M50 would have a different opinion, but that situation is not the same throughout the country.

Home heating is of course an issue. I live in a house that was built around 1903, it originally had 7 working fireplaces. We have done a certain amount of insulation etc. but require some heating, in winter from fossil fuels (oil and coal). The alternative that seems to be considered preferable is to live in a sealed house where you can't open windows but introduce fresh air through some sort of pump powered by electricity!!! I do not want to live in such a house even if I could afford to. Eamonn Ryan says 1,300 people die per year through air pollution? My contribution to that is non-existent yet all the focus seems to be on individual home plans. Is that logical or fair?

A lot has been done to improve air quality for the benefit of people's lives, maybe it is time to focus on other aspects of concern in the country: housing, healthcare etc. We do not live in a garden of Eden, we use natural products to maintain life. We want to minimize our negative impact on the environment for sure but we cannot eradicate it and continue to thrive.

Regards,

■■■■ ■■■■

Sent from Mail for Windows

Email 36

02/05/2022

Hi,

The new air quality strategy should include the banning of burning smoky fuel nationwide without exception. It should also include banning spraying of pesticides and herbicides in fields that can blow into people houses.

A date when there road vehicles can't polute our air.

How to immediately reduce emissions in highly polluted areas such as around Heuston station.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

The following is my contribution to the debate on Ireland's clean air strategy:-

Good air quality is fundamental to human health and well-being and to the protection of biodiversity.

Current EU clean air levels are four times those of the World Health Organisation. Ireland should become a leader in transitioning to the WHO levels by 2025. The current proposals therefore need to be much more ambitious and should contain specific and measurable targets and timescales for each sector.

As far back as 2019 the EPA showed that EU limits on nitrogen oxide were being exceeded. The Clean Air Together citizen science project has also shown high levels of pollution by busy roads. We therefore need strong legislation to protect our citizens, together with a shift in urban planning, farming, transport and protection of nature.

In future Ireland's core wealth will be in clean air, clean water, oceans, forests, bogs and green space. There is potential for Ireland to become an exporter of water to an increasingly drought ridden world if we invest in the proper treatment of our rivers and lakes, and in storage and conservation of water. There is also scope for more hydro electric energy production.

We need to be ambitious and not be swayed by vested interests. Individual profiteering has to come second to the overall welfare of our people. In some areas there is perhaps a feeling that Dublin is dictating and individual freedoms are being lost but we must work collaboratively to bring everybody on board. For instance plans for the protection of bogs and cessation of turf cutting should be seen as a common goal. Yes it will be sad to see the end of turf fires but the science is overwhelming. Ireland has 50% of Europe's remaining bogs and they are huge carbon storage areas. Continued turf cutting is not sustainable. If necessary, those selling turf commercially should be compensated to cease and priority should be given to converting houses that currently use turf for fuel.

We should introduce low emission zones and create green tree filled spaces in all our towns and cities. London emissions dropped by 44% in just 3 years by doing so. We talk of the need for planting new trees and forests but first, as a priority, we need to protect the trees that we have. An accurate record of trees in both public and private ownership is long overdue.

New developments very often mean felling and removal of all trees, hedges and seed banks. This is no longer desirable or sustainable. Climate change, increased temperatures, longer periods of drought and disease will make it more difficult for trees to grow and become established. The trees

we have now are invaluable. Projects such as Bus Connects should be balanced against the tree loss that they sometimes bring. If rolled out to all our cities, this could potentially be huge. In Shankill, where I live, up to 1,000 trees may be lost. Many of these are a hundred or more years old. They are massive, life sustaining and beautiful. Please think again before they are destroyed and replaced by motorway. Trees are most needed in our towns and cities where they are vital in fighting air pollution.

The policy of creating motorways to run throughout the country, combined with high cost of home buying has for years resulted in long distance commuting. We need a rethink to create employment in hubs throughout the country and combine this with remote working which has been shown to work.

The least carbon intensive building is an existing one, so let's refurbish the existing buildings in our cities, many of which are under utilised. Bring life back into the cities in the same way that Amsterdam and other European cities have done.

There also needs to be a rethink on aviation which is one of the most polluting forms of travel. In this regard, the proposed new runway at Dublin Airport should be cancelled. Instead monies should be directed towards encouraging more sustainable travel, in particular metro and long distance high speed trains.

Air quality improvement, reduction in noise pollution and avoidance of light pollution go hand in hand. Please be ambitious and protect Irish people by creating firm and binding proposals in the Clean Air Strategy. Climate Change is real and present. We must act now.

Regards,

██████

Email 38

02/05/2022

Dear Sir, Madam,

I strongly support the provisions recommended by An Taisce to strengthen the propose Clean Air legislation. I urge government to endorse them.

■■■■ ■■■■.

Email 40

02/05/2022

Dear DECC,

I wish to support An Taisce's key recommendations for this consultation ending 3 May:

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

Subsidise and Improve Public Transport

We need to make public transport a better alternative to the private car through subsidising and improving the network.

Invest in Alternatives to Air Travel

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed. We need to cut out turf to improve air quality. The current row shows that it is proving difficult to make the right decisions in this area. Please be brave and make the right moves for our citizens and their children. This will also help address climate change, the biggest issue facing humanity.

Thanks & regards,

■■■■, ■■■■ ■■.

Email 41

02/05/2022

To Whom It Concerns,

I'm writing to you because Ireland isn't being ambitious enough about clean air. "Cleaner" is not good enough when 1 in 10 children have asthma. Now is the best time to be ambitious about air quality because we already have to make changes to mitigate climate breakdown.

I live in Glasnevin and I commute through an shop in Phibsboro where NOx gases are multiples of the WHO recommended limits. I am raising a child here also.

Pursuing a climate agenda of subsidizing retrofitting for more people who aren't upper middle class will allow people to feel the benefits of climate action in the air they breathe. At the very least the WHO recommendations for clean air should be implemented in the Republic of Ireland.

Thank you for reading,

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Email 42

02/05/2022

As a concerned citizen I urge you to use this opportunity to develop a comprehensive air quality plan for Ireland which is equitable and utilises known best practice.

In the necessary banning and control of pollutants such as coal turf etc provision must be made to enable the most vulnerable users use alternatives.

The issue of diesel usage which is so detrimental to health needs urgent attention.

The emerging evidence of damaging levels of VOC emissions from hybrids and the consequent risks to health must be examined.

Rerouting of heavy traffic away from schools and residential areas is essential. Also effective ways to penalise diesel users leaving their engines running with consequent risk to health particularly of asthmatics are needed.

It is vital that we address air quality both for the health of our people and biodiversity health which in turn is essential for the survival of the planet

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Discogs ~ Blog ~ Bandcamp ~ Soundcloud ~ Twitter ~ Tumblr ~ Instagram

I'd like to make some comments on the Clean Air Strategy.

1. Aviation is not considered, and the only reference is to future co-ordinated actions at EU and International level. This is not acceptable, and Ireland needs to show leadership to address emissions from aviation.
2. There is a lack of proper PM monitoring especially at low levels such as 2.5. In the whole of Fingal there is just one PM2.5 monitor at Dublin Airport. There should be multiple monitors in Fingal as emissions from aircraft can travel long distances.
3. There should be monitoring at lower PM levels, down to PM1. Research has shown that smaller PM particles can have more effect on the lungs.
4. A health study needs to be carried out on the population living in the environs of Dublin Airport. There is no research as to the effects of emissions from Dublin Airport on the local population.
5. Aircraft effects should also take into account non CO2 and NO2 emissions.
6. EU Action Plan 'Towards Zero emissions from Air, Soil and Water' needs to be enshrined in Irish legislation. There is a need to reduce environmental effects by 30% from 2017 levels. This is not being adopted by the Aircraft Noise Competent Authority who have decided to use 2019 as their baseline year and not 2017.
7. Aircraft Noise Competent Authority not taking Climate Action and Clean Air policy into their decision making even though it's part of their remit.
- 8.

Yours Sincerely

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

Email 44

02/05/2022

In addition to the comments below, I'd like to add that Ireland has excluded Aviation and Shipping emissions in its first 2 Carbon Budgets, thus subsidising these sectors. This is not equitable and there is already no tax on aviation fuel. All sectors should be treated equally based on their emissions.

Thanks

■

From: ■

Sent: Monday 2 May 2022 15:03

To: airquality@decc.gov.ie

Subject: Clean Air Strategy

I'd like to make some comments on the Clean Air Strategy.

1. Aviation is not considered, and the only reference is to future co-ordinated actions at EU and International level. This is not acceptable, and Ireland needs to show leadership to address emissions from aviation.
2. There is a lack of proper PM monitoring especially at low levels such as 2.5. In the whole of Fingal there is just one PM2.5 monitor at Dublin Airport. There should be multiple monitors in Fingal as emissions from aircraft can travel long distances.
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6. EU Action Plan 'Towards Zero emissions from Air, Soil and Water' needs to be enshrined in Irish legislation. There is a need to reduce environmental effects by 30% from 2017 levels. This is not being adopted by the Aircraft Noise Competent Authority who have decided to use 2019 as their baseline year and not 2017.

7. Aircraft Noise Competent Authority not taking Climate Action and Clean Air policy into their decision making even though it's part of their remit.

8.

Yours Sincerely

[Redacted signature block]

Email 45

02/05/2022

I would like to make a submission on the draft National Air Quality Strategy.

Firstly, I believe strongly that the current draft is not nearly strong enough, or sufficiently focused on action as opposed to aspiration. It is literally vital for many people, but also for our environment generally, that we have strong legislation to bring our emissions into line with the WHO Air Quality limits by 2025.

Our towns and cities especially need regulations which will reduce the emissions. Currently we have schools, hospitals, as well as people's homes and workplaces in areas of dense polluting emissions. To achieve this, we need both an active travel campaign, and a well-functioning, cheap and safe low-emission public transport system which will allow people to rely on public transport rather than cars.

More investment for cycling and walking is essential - which will have the additional benefit of improving public health and reducing health costs. The new runway plans for Dublin Airport should be scrapped and instead investment put into land and sea travel.

Farmers get a lot of flack about emissions, but very little real integrated guidance and assistance in making the necessary changes. Support farmers with clear regulations, guidance and subsidies to make the changes needed to reduce especially ammonia emissions, and to improve the biodiversity of their farms.

Solid fuels must be banned, but those depending on them need to be supported to make the necessary changes, within an achievable timeframe.

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Email 46

02/05/2022

Submission to Government Consultation on Draft Clean Air Strategy

I would like to make the following points:

The Clean Air Strategy should explicitly recognise that everyone in the country has the right to breathe clean air. As well as the negative impact on the health of so many of the population, the major sources of air pollution - transport, home heating and intensive agriculture - are also Ireland's main sources of carbon emissions.

Ireland needs a clear road map, backed by legislation for the major contributors to air pollution - transport, home heating and intensive agriculture - to bring Ireland to WHO clean air standards by 2025 at the latest.

The draft strategy needs to include specific timelines, detailed targets and clear implementation plans. I particularly want to see clear legislation to reduce the air pollution impact of transport by creating low emission zones in our towns and cities; by rapid development of active travel options, infrastructure and supports; rapid development of more public transport options, and by priority investment now in alternatives to air travel, such as trains and ferries.

A similarly ambitious plan, with support, is needed to cut ammonia emissions from intensive farming. A clear and timely action plan is also needed to support people to transition from solid fuels to renewable energy for home heating.

The Clean Air Strategy needs to be ambitious enough to protect the health of our children and adults, and it needs to be backed by specific timetables and legislation.

Thank you

██████████
██████████
██████████

Sent from my iPhone

Email 47

02/05/2022

To whom it may concern;

I support An Taisce's Key Recommendations for the Clean Air with a few other suggestions below;

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms. As a farmer and someone trained in Holistic Planned Grazing I do not support a blanket recommendation to reduce the national herd by a particular percentage. Intensive all year round shed reared cattle should be phased out as slurry spreading is a key part of the ammonia problem. Ireland needs to encourage outdoor grass reared livestock with housing restricted to the worst of the winter. Deep litter bedding of livestock as practiced by organic farmers needs to be incentivised.

Farmers should have the quantity of animals (livestock units) their land can support without additional inputs from outside the farm. The emphasis for farmers should be on the profit their farm generates not the number of livestock units it supports. The current mindset in farming seems to be more animals more profit and this is often not the case, in fact the opposite is frequently the reality, especially since the cost of bagged feed has increased dramatically in the last year.

Plant more Trees - the right tree in the right place.

A change to the planning guidelines and ultimately the planning law should make it obligatory to have landscaping/tree planting plans incorporated in the planning applications and enforced! Trees are not just decorative but functional in reducing air pollution, if the right tree is planted in the right place. Education is the key here as it seems that most people do not understand which trees are good for urban and which trees are more suitable for rural environments.

<https://www.bbc.com/future/article/20200504-which-trees-reduce-air-pollution-best> Create Low

Emission Zones in our cities A Low Emission Zone is an area of a city in where access for heavily

polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

There needs to be a critical mass of vehicles converting to hydrogen fuel cells to make it a viable alternative. This is particularly important for the transport industry as truckers are huge consumers of diesel. Financial and policy supports are needed to help the transport industry make this transition. It is great that Bus Eireann have a few hydrogen fuel cell buses but this needs to become more widespread more quickly.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

Subsidise and Improve Public Transport

We need to make public transport a better alternative to the private car through subsidising and improving the network.

Invest in Alternatives to Air Travel

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. Those impacted the most should be prioritised in the National Retrofitting Scheme and any backlogs addressed. The results of the recent census should greatly assist in identifying the numbers and areas where this prioritisation is required.

Should you require any additional information on the points mentioned above please do not hesitate to contact me.

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Email 49

03/05/2022

I am writing this email in response to the Clean Air Strategy, which I believe falls short in what it is ultimately trying to achieve.

The below points are some suggestions of ways to amend the existing strategy:

Subsidise and Improve Public Transport

We need to make public transport a better alternative to the private car through subsidising and improving the network.

Invest in Alternatives to Air Travel

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

■■■■ ■■■■

Hello

Please find my submission to the National Air Quality Strategy .

My main issue and request as a citizen is improved accessible public engagement, participation, outreach and discussion - to inform the public and also work alongside the public as there are a lot of changes needed to implement clean air that we all expect. It is a topics are connects everyone. Plain English and good explanations are critical. Imagine if the public education on particulate matter and air quality was along the same lines as the public information for Covid.

The points below are taken from An Taisce and I appreciate their guidance and they align with my views. I would appreciate that the input from the Environment Pillar and the PPN be central to the strategy.

1. Recognise the Right to Breathe Clean Air - The Clean Air Strategy should explicitly recognise that every person in the country has a right to breathe clean air.
 2. Legislate for World Health Organisation standards - Ireland's air pollution levels are dramatically higher than the safe levels that the WHO has identified. The government should commit to introducing legislation setting out a legislative path to getting Ireland to WHO standards by 2025 at the latest. The legislation should be completed this year.
 3. Detailed Action - The Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner. This should include specific timelines, detailed targets, and clear implementation plans for each major sectoral area.
 4. Transport –
- * Legislate for Low Emission Zones in our cities : Low Emission Zones are crucial in reducing the air pollution impact of transport. Our city-centres should be designated as Low Emission Zones. This means that heavily polluting vehicles would be restricted from access to the Zone, and congestion charges would be applied. They have been successfully implemented in many European cities, including Paris, Amsterdam, Brussels, London and more. In London, air pollution reduced by 44% in 3 years, largely due to the use of Low Emission Zones.

* Active Travel Revolution: We should be moving much faster to encourage people to use active travel instead of private cars. This involves acceleration of cycling infrastructure projects, pedestrianisation of roads, and the introduction of grant schemes for electric bikes and scooters to make them more accessible for as many people as possible. Speed limits 30kph default all built up areas.

* Invest in Alternatives to Air Travel : We are in a climate crisis. Despite this, the Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government and investment should be put into alternative modes of transport and integrated infrastructure like ferries and trains.

5. Agriculture

* Reduce Ammonia Emissions: Agriculture is the main source of ammonia emissions in Ireland. Ammonia is very dangerous for human health, and a major problem for climate. Ireland is far above the legal limits for ammonia pollution, and has been the subject of complaints by the European Commission. According to the EPA, the cause of our spiralling ammonia emissions is primarily the increase in cattle numbers.

* Fund the Just Transition for Farmers : Principles of Just Transition should be at the heart of reforms for agriculture, supported by appropriate funding. A fund should be created to support farming communities in their transition from intensive agricultural output to more sustainable modes of production and activity. Crucially, our national agricultural policy means that most farmers have little choice but to increase the intensity of their output. The Government needs to address this, and incentivise farmers to reduce intensity and increase diversity on their lands.

* Learn from Other Countries : In 2020, the United Kingdom published its air quality plan, which includes plans to cut ammonia emissions from agriculture by 16% by 2030. At the end of 2021, the Dutch government published a €25 billion plan to reduce livestock numbers by up to 33%, including compensation schemes for farmers, and supporting the transition from intensive to extensive farming methods. This scale of ambition is absent in Ireland.

6. Home Heating :

Email 53

03/05/022

Good afternoon,

I am sharing An Taisce's Key Recommendations and ask that you take them into consideration.

I feel particularly strongly about the need for concrete Public Transport actions - I take the Dublin bus even though it doubles my commuting time but there have been far too many occasions when the bus fails to show up, making it an unreliable form of transport for many (this has happened on numerous routes). Having clean and reliable transport options is very necessary for this strategy.

Kind regards,

████████████████████

████████

An Taisce's Key Recommendations are:

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

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We need to make public transport a better alternative to the private car through subsidising and improving the network.

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Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

(1) EPA, Air Quality in Ireland 2019

Email 54

03/05/2022

A Chara,

I am emailing to ask for a better, more ambitious Clean Air Strategy through the following recommendations:

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

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Investment should go to integrated infrastructure like ferries and trains instead. Support Farmers to Reduce Ammonia Emissions Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

I look forward to seeing more ambition for climate action and climate justice on these matters.

Best wishes,

██████████

To whom it may concern...

Residential Sector

I respond to your consultation only in regard to the residential sector and in particular the use of wood burning stoves within that sector. While the improvements proposed for this sector will likely improve general air pollution levels, I can't see that they give new protection to neighbours of heavy use burners living with smoke emissions in the immediate vicinity of their homes. Given how popular wood stoves have become in the last decade and how dangerous to the health of users and their neighbours we now know them to be, I'm very disappointed.

Our personal experience

I have three young children (2, 5, 7) and every year since we moved into our bungalow in 2016 our neighbours burn wood in their wood burner stove for circa six months of the year from 8 in the morning until after 9 at night, every single day. They installed the stove the same year that we moved in and choose to use it as their sole heat source for their whole house despite having the options of electricity and gas available.

We are directly North East of their H shaped flue which is on the roof of their single storey extension. Ireland's prevailing wind and the fact that the flue is lower than their roof causes the smoke from their fire to blow downwards towards our house and garden. The smoke is at ground level. Even though the flue is completely ineffective at clearing the smoke away from our home and garden it is legal under current building regulations. If they burned this wood in their garden it would be illegal. We cannot open our windows or doors at all during the day as this lets the smoke in and there is no opportunity to air the house out again. The smoke gets in anyway as we go in and out during the day, despite our best efforts. Our children cannot play in our back garden as it is very smoky all day long and not safe to breathe in. We run 2 air purifiers and a de-humidifier all day to try to make the air safer to breathe in our own home and counteract the fact that we cannot open windows after showers, cooking, tumble-drying etc.

We are very scared about the effect of all of us breathing the PM2.5 and PM10 from their smoke on both our long and short-term health. It's a horrible situation to be in. We have offered to pay for any electric or gas alternative to using their stove including removing their existing stove. We have also offered to pay for half the cost of fitting an ecoDesign stove and higher flue. Given their high usage we

are very concerned that we will still be exposed to a lot of smoke over our lifetime from this solution so we are unwilling to pay for it in full.

We feel our children's health is being held to ransom. We have even offered to pay their electricity bill if they would try using an electric heater. Despite all of our efforts it is not looking likely that they will go with any of these solutions as they are happy that the stove heats their house cheaply and the smoke "isn't causing them any problems".

Since they are burning wood, rather than coal, we have no recourse. The Clean Air Strategy needs to protect us and others in this impossible position. It should be possible to measure the particulate matter coming from stove flues and if levels are exceeded regularly action should be taken to protect their neighbours.

Current Protections for Neighbours

In our circumstance I believe we would have a case under the Air Pollution Act, 1987 which states that "the occupier of any premises shall not cause or permit an emission from such premises in such a quantity, or in such a manner, as to be a nuisance". However, the local County Council is the relevant enforcement agency for this and the appetite or perhaps the resources to prevent this problem does not seem to be there where the substance being burned is not a banned fuel under the Solid Fuel regulations. This needs to be addressed under the Clean Air

Strategy. People's existing behaviour will need to change and in some scenarios this will need to be instigated by encouragement from the local authority. It appears that we would be well protected in the UK. They seem to have provided for this situation since 1990.

See info here:

<https://www.staffordbc.gov.uk/nuisance-wood-burning-stoves-and-open-fires>

Surely 12 years later Ireland could manage similar protections for people?

Wood Type

This year our neighbours claim to be burning wood with a moisture content of less than 20%. It's true that it is different smelling smoke than previous years but when it is coming directly at your property and garden all day that doesn't really matter. We can't open our windows to let smoke in or let our children play in the garden in it even though it's probably less smoky than previous years. There is no

level of PM2.5 that is safe for them to breathe, the WHO is clear on this. The proposed changes won't really improve anything for anyone in our situation or similar. They will probably help general air pollution levels though. Burning wood with a low moisture content is proven to be only marginally less damaging to health than burning other solid fuels. I feel people will be confused into believing that it is safe to breathe wood smoke if it is allowed under this strategy.

Daytime Residential Burn Ban

Something radical needs to be done now to protect the health of people living close to these emissions. The health issues they cause short and long term are completely avoidable in 2022 and expensive to our health system to treat and manage. There has been much media coverage recently about the damage to health caused by wood smoke but no new protections for people living next to them. The WHO is clear, there is no safe level of PM 2.5 or PM10 for people, particularly young children to be breathing. This Clean Air Strategy does nothing to help us and the many, many others in similar positions. Ireland should be a trail blazer here in the same way that we were with the smoking ban. We should introduce complete daytime burn bans in residential areas. It is the only way to immediately protect our children's health from the pm2.5 and other toxins emitted. This would be controversial, but everyone would feel the benefits and the most vulnerable, our children, who are only out playing during the daytime would be given the protection they deserve. Windows are usually closed during night time in winter too. The avoidance of fuel poverty has been cited as one reason not to do this but treating people's health issues caused by these stoves is very expensive. It would only need to be enforced in situations where the smoke is actively imposing on the health of near neighbours.

There could also be a burn amnesty to cover the rare occasions when there is no electricity/gas supply or for OAPs.

My neighbours are young and completely agree that it is too smoky to let kids play in. They have told us before that they would not let their own children play in the smoke. That is our experience too, whenever their children or themselves want to use their garden, they stop the smoke. We don't have that ability.

There needs to be a public awareness campaign educating people of their dangers.

Given that Environmental Protection Agencies in many countries have now proven wood burning stoves to be more dangerous to people's health than passive smoking the packaging for their fuel should be forced to highlight these health risks in a similar way to the packaging on cigarette packets.

The stoves themselves should also be forced to be sold with clear warnings of the health risks that they pose to their owners but also particularly to their neighbours.

At the moment, few people who install wood stoves are likely to understand their potential to damage the health of their family and neighbours. They are marketed legally as being an Eco-friendly renewable heat source.

Covid-19 & working from home

I believe that the smoke emissions from wood burning stoves is going to be more of an issue for people since Covid-19. A lot more people than previously will continue to work from home and therefore generate more emissions during the day time hours than previously if using a stove as their heat source of choice. Others working from home will be exposed to more smoke during daytime hours in this scenario. Both groups are more aware of the importance of ventilation and the need to open windows. The air outside their windows should be safe to breathe and people should have a clear course of recourse if it is not.

Building Regulations

The Clean Air strategy needs to have provision for stove flues to be a minimum height from the ground in residential areas so that their emissions don't interfere with the air quality at ground level in the way our neighbours' one does. Wood burning stoves seem to be the trend for heating new single-story extensions over the last decade and the current building regulations only require them to be a set height higher than their own roof not the ground. Neighbours should not need to be concerned at how nearby houses are heated. The flues should be high enough to be effective at clearing the smoke away from their homes. Where this is not happening people should have a clear course of recourse and the owners of the flue should be forced to address the issue even if the

flue complies with building regulations.

The cowl type and shape allowed for new flues should also be reviewed to provide the most protection to neighbours. The proximity to neighbours of flues allowed should also be reviewed. The proximity allowed should be increased when there are neighbours directly down wind of the prevailing wind direction from the flue exhaust too.

EcoDesign Stoves

Many of the benefits of EcoDesign stoves rely on their correct usage. However, there is no requirement to educate people on how to use and maintain their stoves to minimise their emissions. Also, many of the improvements of Eco design stoves are for the protection of the homeowner using them rather than reducing their emissions to the outside of the home. I worry that their usage could actually increase in line with the improved safety for the stove owner to the detriment of neighbours forced to breathe their emissions. This should be addressed under the Clean

Air Strategy

End-Of-Life stoves

There is currently no way to end of life existing stoves and no regulation over the safety of their emissions. We could be waiting another 10 years or more before our neighbours upgrade their stove to an EcoDesign one. Given their heavy usage their current stove is likely near end-of-life already but without new legislation there is nothing to encourage or force them to upgrade it.

Public awareness of this public consultation

Although this problem has been central to the life of my family for the last five years and I have searched online of ways to help alleviate the problem and knew that the Clean Air Strategy was under development it has taken me until now to come across this consultation and I missed the “Public Consultation on the development of new Solid Fuel Regulations for Ireland“ entirely which I would have been very interested in commenting on. I question where and how comprehensively these consultations have been advertised to the general public as the number of independent responses seems very low.

I welcome this Clean Air Strategy and I feel it will really improve general air quality in Ireland and save many many lives. However, I do hope my concerns are considered and addressed before its final implementation. In its current form, direct neighbours of heavy solid fuel burners just aren't protected and I worry that it's our health that is under the most threat from PM2.5 and PM10 residential emissions.

Best regards,

██████████ and █████ █████
██████████, ██████████

Email 56

03/05/2022

If the government is serious about a clean air strategy then it must tackle road transport. It can do it at a minimum cost to the taxpayer and probably less cost than any other strategy.

By a single piece of legislation road transport could reduce its particulate emissions, NOx emissions and greenhouse gas emissions substantially. It could also bring other side benefits such as safer roads, reduced imports of fossil fuels and more money in the pockets of most families. The single piece of legislation is of course reducing the top speed limit to 80km/hr. This is the top optimum speed for fuel consumption. The research has been done, the support** is there all that is needed is the willingness of the government. It is also very dangerous to be promoting cycling as a way of reducing harmful emissions before the speed limit is brought down. " Above 60 km/h there is an exponential increase in risk of involvement in a casualty crash with increasing travelling speed such that the risk approximately doubles with each 5 km/h increase in travelling speed."

Kind regards

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web: ████████████████████

Phone: ████████████████████

email: ████████████████████

Email 57

03/05/2022

Hi there,

I would like to recommend that the government adopt An Taisce's recommendations for improving the Clean Air Strategy. These are:

Legislate for WHO Air Quality limits by 2025

The WHO Air Quality Guidelines are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.

Create Low Emission Zones in our cities

A Low Emission Zone is an area of a city in where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.

Start an Active Travel Revolution

We need more investment for safe cycling and walking infrastructure. Cycling and walking should be the priority in towns and cities, for better air quality, lowering carbon emissions and our physical and mental health. We need to make sure cycling is accessible to as many people as possible through more subsidised bike schemes and affordable rental schemes.

Subsidise and Improve Public Transport

We need to make public transport a better alternative to the private car through subsidising and improving the network.

Invest in Alternatives to Air Travel

The Government is ploughing ahead with its plan to build another runway in Dublin Airport, and increase its flight numbers dramatically. This would have serious consequences for air pollution and for carbon emissions. The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.

Support Farmers to Reduce Ammonia Emissions

Subsidy and grant schemes should be introduced that facilitate farmers to reduce the intensity of their ammonia emissions, and to diversify their farms.

Expedite Retrofitting for Most Impacted by Solid Fuel Regulation

The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

Recognise the Right to Breathe Clean Air

The Clean Air Strategy should explicitly recognise that every person in the country has a right to breathe clean air.

Legislate for World Health Organisation Standards

Ireland's air pollution levels are dramatically higher than the safe levels that the WHO has identified. The government should commit to introducing legislation setting out a legislative path to getting Ireland to WHO standards by 2025 at the latest. The legislation should be completed this year.

Be More Specific around Targets, Implementation Plans & Timelines

The Draft Strategy includes some very ambitious rhetoric, but it is light on detail. The Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner. This should include specific timelines, detailed targets, and clear implementation plans for each major sectoral area.

Thank you,



Dear Minister Ryan (and other members of the Government),

With regard to the Clean Air Strategy please note the following as my response to the consultation:

1. The Right to Breathe Clean Air - should be the central guiding principle for the National Clean Air Strategy
2. Clean vs. Cleaner: In accordance with the WHO, the aim of the Strategy should be revised to deliver "clean air" rather than "cleaner air".
3. The Strategy should be placed on statutory footing to ensure a whole-government approach and enhanced policy coherence.
4. WHO Air Quality Standards 2021: The Strategy should set out a path for Ireland to adopt WHO standards for air quality by the end of the 2022 at the latest.
5. Improved Specificity: The Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner.
6. Monitoring and Accountability: The Strategy should be revised to include clear monitoring and accountability mechanisms that are measurable, actionable and time-bound.
7. Research Inequality: The Strategy should map out a research plan to examine how air pollution impacts certain vulnerable and marginalised groups, such as members of the Traveller community, low-income households, people with disabilities, people with respiratory conditions, those who experience energy poverty, and children.
8. Address Inequality: The Strategy should identify measures to (1) engage with impacted communities on air quality issues and (2) adopt appropriate supports for impacted communities to ensure that actions to address air pollution across Ireland are both inclusive and fair.
9. Disseminate Data: The Strategy should require public bodies and local authorities to provide real-time localised air quality information as part of a national awareness campaign.

10. Adopt a new Clean Air Act that would provide greater powers to local authorities to deal with air pollution issues, as well as enhanced access to justice provisions for individuals and organisations.

Thank you.



Hello,

I would like to make the following submission:

- * There needs to be much more monitoring of air pollution levels. There are very few monitoring stations in Irish towns and cities. In Dublin, for example, many of the stations are located far from busy roads making it impossible to take useful readings.
- * In 2019, air pollution was linked to over 1,300 avoidable premature deaths in Ireland.
- * The main sources of air pollution are also Ireland's main sources of carbon emissions: transport, home heating and intensive agriculture.
- * Ireland needs to legislate for World Health Organisations Air Quality limits by 2025 - these limits are a set of evidence-based recommended limits for specific air pollutants developed to help countries achieve air quality that protects our public health.
- * Create Low Emission Zones (LEZ) in our cities, these are areas where access for heavily polluting vehicles is restricted. Only low or zero-emission vehicles are given access, and highly polluting vehicles may be required to pay congestion charges.
- * We need even more investment for safe cycling and walking infrastructure. This increases air quality, lowers carbon emissions and improves our physical and mental health.
- * We need to make public transport a better alternative to the private car through subsidising and improving the network.
- * Call on the government to cancel the plans to build another runway at Dublin airport. Investment should go to integrated infrastructure like ferries and trains instead e.g. national train service and sail/rail to UK & Europe.
- * Support needs to be given to farmers to reduce ammonia emissions & diversify their farms e.g. subsidies, grants
- * Expedite Retrofitting for Most Impacted by Solid Fuel Regulation
- * The elimination of solid fuel burning in Ireland is a crucial target, but it must be achieved by providing realistic and timely alternatives not by depriving people on low incomes of access to home

heating. This impacted most should be prioritised in the National Retrofitting Scheme and any backlogs addressed.

* The draft plan is not detailed enough, we need more specific plans and targets

* Stop our over reliance on natural gas - there is nothing natural about it. It is a fossil fuel - our priority has to be renewable energy production from here on out.

Thanks and regards,

■■■■ ■■■■

Good morning, and thank you for the opportunity to respond on this matter.

I am writing to you from Stoneybatter in Dublin, an area with a lot of motor pollution and where I have many neighbours with asthma and other conditions in which air pollution has been implicated. I am aware of the growing scientific data on the impact of clean - or dirty - air on quality of life and life expectancy, and this issue is a significant priority for me, as are the Climate and Biodiversity Crises.

I write in support of An Taisce's recommendations to:

- * Legislate for WHO Air Quality limits by 2025
- * Create Low Emission Zones in our cities as a matter of urgency
- * Transform Ireland's transport habits, by making active and sustainable transport options practical, accessible and appealing for as many people as possible - again, as a matter of urgency.
- * Invest in Alternatives to Air Travel (I write this as someone whose aging parents live in Liverpool.) The North Runway project should be cancelled by the Government. Investment should go to integrated infrastructure like ferries and trains instead.
- * Support Farmers to Reduce Ammonia Emissions
- * Expedite Retrofitting. I am myself involved in Stoneybatter's Sustainable Energy Community, Cosybatter, and I am extremely keen that people are able to live and work in healthy, environmentally-friendly buildings. I believe better financial supports are needed (for example the challenges faced by those living in G rated buildings is close to my heart), along with more incentives, encouragement and communication. I am also conscious that we need a labour force capable of delivering these improvements, which is a challenge in itself.
- * I would also like to see an increase in the amount of monitoring locations, particularly in urban areas.
- * I am keen to see an actual enforced crackdown on engine idling - I live near to three schools, and this is an issue in my immediate environment.
- * And I also feel - to pick up on some references above - that much more could be done

to inform the wider public about the damage done by poor air quality.

With thanks again for the opportunity to engage on this, and very best of wishes with your work,

[REDACTED]

[REDACTED]

[REDACTED]

Email 61

03/05/2022

Dear Sir or Madam,

If the government is serious about a clean air strategy then it must tackle road transport. It can do it at a minimum cost to the taxpayer.

By a single piece of legislation road transport could reduce its particulate emissions, NOx emissions and greenhouse gas emissions substantially. It could also bring other side benefits such as safer roads, reduced imports of fossil fuels and more money in the pockets of most families.

The single piece of legislation is of course reducing the top speed limit to 80km/hr. This is the top optimum speed for fuel consumption. The research has been done, it is an egalitarian option that does not differ between rich or poor road user, all that is needed is the willingness of the government.

While it is wonderful that the Irish Government is promoting cycling it would be beneficial to the promotion of cycling, and for cyclists, that the speed limit be lowered..

Best wishes

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Eircode: ■■ ■■■■

Please see jpeg attached

Dear Minister Ryan and the Government

- ✓ **Right to Breathe Clean Air:** the right to breathe clean air should be the central guiding principle for the National Clean Air Strategy.
- ✓ **Clean > Cleaner:** In accordance with the World Health Organisation, the aim of the Strategy should be revised to **deliver “clean” air rather than “cleaner” air.**
- ✓ **A Whole of Government Approach:** the Strategy should be placed on statutory footing to ensure a whole-of-government approach and enhanced policy coherence.
- ✓ **World Health Organisation (WHO) Air Quality Standards 2021:** the Strategy should set out a path for Ireland to adopt WHO standards for air quality by the end of 2022 at the latest.
- ✓ **Improved Specificity:** the Strategy should be revised to specify how the priority areas, and the overall objective of the Strategy, are to be implemented and delivered in a timely manner.
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- ✓ **Address Inequality:** the Strategy should identify measures to (1) engage with impacted communities on air quality issues and (2) adopt appropriate supports for impacted communities to ensure that action to address air pollution across Ireland is both inclusive and fair.
- ✓ **Disseminate Data:** the Strategy should require public bodies and local authorities to provide real-time localised air quality information as part of a national awareness campaign.
- ✓ **Adopt a New Clean Air Act:** provide greater powers to local authorities to deal with air pollution issues, as well as enhanced access to justice provisions for individuals and organisations.

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Sent from my iPhone

Dear Minister Ryan and the Government

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- ✓ **Adopt a New Clean Air Act:** provide greater powers to local authorities to deal with air pollution issues, as well as enhanced access to justice provisions for individuals and organisations.

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

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

Bearing in mind the latest IPCC report, which has been explicitly endorsed by government, and bearing in mind widespread acceptance of both the environmental and public health harm directly caused by air pollution, the draft clean air strategy is nowhere close to being ambitious or explicit enough to ensure meaningful changes to air quality in the State. The 5 strategic pillars, though laudable in sentiment, are insufficiently explicit in terms of proposed actions to address the primary causes of air pollution. The international community has accepted that we are long past the point of the climate crisis where 'raising awareness' can have the desired impact within the timescale necessary to avert a catastrophic climate event. Hence the strategic pillars should be focused on restricting harmful activities, backed with a workable and effective enforcement regime - neither of which are in place today.

With that in mind, the strategic pillars should include:

1. A complete ban, backed by penal sanction, on the burning of any solid fuel for the purposes of residential heating in urbanised areas, save where a household can demonstrate that a solid fuel appliance is the sole source of residential heating. Such homes should be required to register and be subject to inspection. Installation of new or replacement of existing solid fuel appliances should require planning permission taking into consideration the harmful environmental impact. The Environmental Protection Agency and local government should be allocated resources and given powers necessary to enforce the burn-ban by remote monitoring. This is neither a particularly harsh nor particularly novel measure – many jurisdictions already operate some degree of 'burn ban'.
2. As an allied just transition measure, there should be a relaxation of threshold requirements for households to qualify for fuel poverty supports. Households where a solid fuel appliance is the only source of residential heating and households at risk of fuel poverty should be prioritised for retrofit supports to move away from solid fuels as soon as possible.
3. There are a range of 'low-hanging fruit' measures which can be taken easily while the State transitions away from its dependence on private fossil fuel powered transport. The strategy should address implementation of these, including;
 - 'car free' days in major towns and cities,
 - The introduction of pollution charges for driving a combustion powered vehicle into town and city centres,
 - Emphasis on 'modal shift' in towns and cities away from private vehicles, towards active mobility. This requires a radical redistribution of the public space currently dominated by space allocated to private individual cars,
 - Investment in accessible comprehensive EV charging infrastructure,
 - Allocation of resources to adequately enforce existing anti-social road behaviours.
4. State supports for agriculture, including the marketing support of State bodies such as Bord Bia, should be redirected away from support of comparatively damaging activities including excessive production of beef and dairy products and the spreading of ammonia, towards support for less intensive agricultural activities and moving to sustainable, plant-dependent diets.

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

The relative dearth of accurate and timely data on air pollution is a major source of difficulty. The State's air quality monitoring infrastructure is limited and poorly managed. This is masking the urgency of the problem and giving a false sense of security *viz* compliance with WHO advised limits. Investment should be prioritised into a comprehensive network of real-time air quality sensors monitoring particulate, NO₂ etc. Sensors should be placed at appropriate locations where sources of such pollutants are likely to arise, e.g. on major roadways, in residential areas etc.

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

Poor air quality has been known to damage both the environment and public health for decades. We have also known for decades what the primary activities contributing to air pollution are. It is not an issue which requires further research in order to necessitate the taking of decisive action.

An emerging area of consideration which merits further study is the impact of poor air quality and related State inaction as a contravention of human rights standards. Recent legal proceedings, including the tragic case of Ella Adoo-Kissi-Debrah in the UK, has demonstrated that State failure to take action on the causes of air pollution engages and can constitute a material breach of human rights norms, including Article 2 of the European Convention of Human Rights. It is also arguably a breach of Irish constitutional protections, including the right to bodily integrity under Article 40.3. It is likely that continued State inaction on the causes of air pollution will result in an increasing volume of litigation against the State for its failure.

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

The health impacts of air pollution are already well known and have been the subject of research for decades. We already know, for example, that that toxic gases and particulate matter released through the burning of solid fuels is a direct cause of chronic respiratory diseases including asthma, COPD and lung disease, particularly in children and other vulnerable groups. We already know that exposure to air pollution directly contributes to the premature death of hundreds of people every year. For comparison, between 28th February and 11th December 2020, Covid-19 caused 1,862 deaths in Ireland – but we kill almost as many people every year by lighting fires in our homes for the ‘ambiance’. We already know that these toxins can be carcinogenic. We also know that air pollution can cause deeper harm to health beyond the respiratory system, including causing autoimmune diseases and dementia. There is also significant evidence that in-utero exposure to air pollution has a damaging effect on children even before birth.

Aside from acknowledging these scientific facts and making them more widely known, the most significant contribution the State can make to increasing public understanding of the health impacts of air pollution is by taking actions against the deliberate propaganda and misinformation on the topic perpetuated by actors in the solid fuels and heating industries, for example the Stove Industry Alliance and fuel retailers. Such bodies perpetuate known falsehoods, for example about the ‘environmentally friendly’ credentials of ‘eco design’ stoves, or that burning wood is a ‘green’ or ‘renewable’ fuel source – all of which are demonstrably incorrect.

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

We are long past the point where a clean air awareness campaign can possibly have any meaningful impact in time to avert a climate catastrophe. Rather the focus of the clean air strategy should be on allocating resources to take direct action against the primary causes of air pollution, which we already know to be residential burning of solid fuels, transport and agriculture.

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

The only metric that matters is a material reduction in the level of pollutants emitted. Per question 3, the State’s current level of monitoring these pollutants is poor. Investment should be prioritised into a comprehensive network of real-time monitoring stations located near the likely sources of pollution to provide reliable data on emissions. Benchmarks should be devised that do not rely, as the standard WHO measures do, on annualised or averaged levels of pollution. This is particularly necessary in Ireland, where a major cause of pollution is residential burning, which of its nature is largely seasonal. It is not sufficient to claim compliance with WHO standards, where such standards are based on annualised/ averaged emissions, but be in breach of those levels for 6 months of the year.

Submission for Public Consultation

on

Clean Air Strategy

During the COVID19 Pandemic, every citizen became acutely conscious of the effects on our health of the very air that we breathe. Avoiding possible contaminants in the air we take into our lungs became a priority for all. The importance of breathing clean air is not confined to the COVID 19 issue. Rather, that pandemic has raised awareness of the importance of clean air and how this 'commodity', which we previously may have taken for granted, underpins every aspect of our lives. **Clean air is a right** that every citizen should expect the Government to champion on their behalf. **The Strategy should explicitly state this** in order to concentrate the minds of policy makers and those who can influence the achievement of this goal.

The concept of clean air should not be confined to discussions about the avoidance of polluted air as a result of industrialisation. There are myriad aspects to this issue:

Transport

Cycling and walking, in and around our cities and towns, are of paramount importance. Clearly, each of these methods of transport results in few (no) emissions. Each improves physical and mental well-being and so reduce the Health Budget. Nevertheless, the infrastructure needs to be improved so that cyclists and pedestrians are safe and feel confident about their safety when making this choice. Cycle lanes of sufficient width, with a physical barrier segregating cyclists from other road users are a must. Likewise, pedestrian paths of adequate width to accommodate wheelchair users or baby buggies are essential. Squeezing both cyclists and pedestrians onto a shared small space is not an adequate method of encouraging people to undertake cycling or walking.

Subsidies to encourage the purchase of bicycles are essential. The Cycle-to-Work Scheme is a successful scheme and should be retained/ extended. An alternative is an extensive bike rental scheme. Not every town or city dweller has the space to store a bike. Rental per journey is a viable option provided there are sufficient rental bikes in the scheme. This should not be confined to cities, but would also be very useful in towns.

Cities in other countries, such as Utrecht, Amsterdam, Stockholm have successfully catered for adequate cycling infrastructure. Everybody, of all ages, cycles in these cities. There are adequate lanes, safe storage and links with bus and train stations. Each mode of transport is considered as part of a whole, not in isolation. **Studying what other countries have successfully done**, would be of huge benefit. As we are starting out on improving our transport systems with clean air in mind, we can learn from the successes and failures of other countries in this regard. This is not a waste of public money. In fact, if undertaken properly it saves public monies and avoids expensive mistakes.

While the LUAS in Dublin is a great system, there are some problems with car parking at stations. If it is not possible to park a car and continue the journey on the LUAS, then the whole journey has to be undertaken in the car,. This is a missed opportunity and results in needless emissions, thus not catering for the Clean Air Strategy.


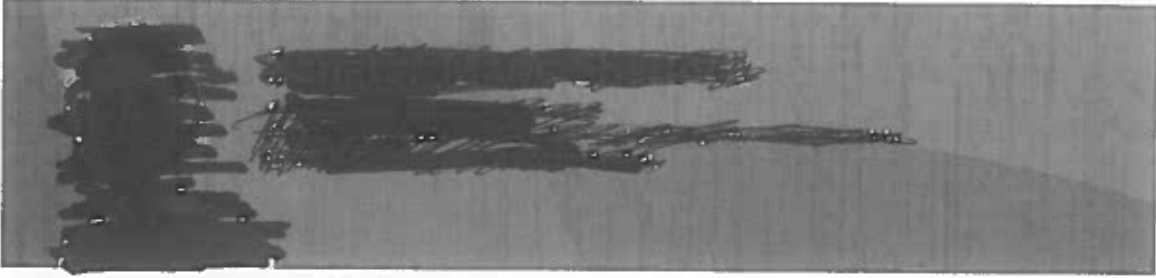
We need to create **Low Emission Zones** in our cities. Polluting vehicles need to be kept out of these areas or charged with a congestion charge to discourage them. Access should be confined to low or zero emissions vehicles.

Retrofitting homes is a crucial element of attempting to reach clean air targets. The BER ratings on rental properties on real estate websites are appalling. By increasing the BER ratings, fuel consumption and air quality will improve exponentially. Of course, this is expensive. Those on lower incomes should have first access to grants and subsidies to encourage a move away from polluting fuels.

Farmers need particular assistance to reduce ammonia emissions and to diversify their farms. It is unrealistic to expect them to unilaterally change their farming methods without significant help from Government.

The **World Health Organisation** has identified what 'clean air' is. Ireland has fallen below the WHO targets. The Clean Air Strategy should take on board the recommendations of WHO and legislation should be in force by 2025 to ensure that Ireland reaches the targets by that date. Specific timelines, detailed targets, and clear implementation plans for each major sectoral area need to be included in the Strategy.





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

Submitted via email: airquality@decc.gov.ie

3rd May 2022

Submission on the Clean Air Strategy for Ireland

To the Members of the Air Quality Division,

I welcome the opportunity to share my thoughts on this vitally important issue.

At the outset, let me say that the adoption of an effective Clean Air Strategy is essential to the future wellbeing of people in all parts of the country.

I believe we must make sure to recognise the serious impact poor air quality has on certain communities, such as those of Dublin's North Inner City and the communities located inside the canals in Dublin. High traffic volumes into the city are a major contributor to the prevalence of poor air quality of the area, making it even more important to promote active travel and sustainable, affordable home heating solutions for these communities and others like them.

Furthermore, the Government's strategy must set a clear target and path to adoption of the World Health Organisation's air quality standards that were revised in 2021. The scientific evidence is unambiguous that lives can be saved and illness prevented or mitigated if there are reductions in harmful particulates in the air that we live and breathe in.

My observations are set out below. I hope they will be useful in finalising the Clean Air Strategy.

1. Expanding Existing Strategic Priorities

Recommendation: *A target of genuinely clean air for all must be explicitly set down. The strategy must clearly prioritise areas which currently have lower air quality, and to improve public awareness of how their actions and the actions of the State can contribute towards improving our air quality. In effect, strategic priorities number 1 to 5 in the existing documents must be expanded to include the above.*

The five keys strategic priorities outlined in the document are welcome, however I would suggest that the scope of Priority 1 and 5 could be usefully expanded.

For Priority 1 ("ensure continuous improvements in air quality across the country") I would suggest that the goals should not only be continuous improvement, but the ultimate delivery of genuinely clean air for all. Furthermore, while improvements should of course be made all across the country, some reference is necessary on the need to prioritise areas where air quality is currently poor.

I would propose new wording for Priority 1 to read: "To ensure continuous improvements in air quality across the country, with a particular emphasis on areas where air quality is currently poor, and with the ultimate goal of delivering genuinely clean air for all."

For Priority 5, I strongly welcome the emphasis placed on improving public awareness of the importance of clean air. However, I believe it is also important to raise awareness of the State's plans in this area, and of the potential role of communities and individuals in helping to achieve these goals, and where necessary holding the State to account should targets not be met.

I would suggest modifying the current text of Priority 5 to read: "To promote and increase awareness of the importance of clean air, of existing and future air quality targets set by Government, and of the role that individuals and communities can play in ensuring these targets are met."

2. Ensuring Better Availability of Emissions Data

Recommendation: *Include an additional strategic priority which sets out the need for more air quality monitoring, including by installing new monitors in densely populated, high-traffic areas communities such as Dublin's Northside.*

While Strategic Priority 3 does call for a wider evidence base on sources of air pollution, I believe that the strategic priorities of the Clean Air Strategy must be more specific. We must include that a key goal of this strategy should be to increase the active monitoring of high-traffic areas for air quality.

In practical terms, this should include significant expansion of the number of active air monitoring stations across the country, and within the Northside of Dublin in particular. At the moment, the Air Quality Index for Health (AQIH) informs much of our understanding of air quality in Ireland. And yet, the Environmental Protection Agency's current list of monitoring stations includes none between the River Liffey and the River Tolka east of the Phoenix Park.

It is not acceptable that such densely populated areas, which act as a gateway to the city through three major arteries in Drumcondra, Phibsborough and Stoneybatter, are not currently monitored on a sustained basis.

From the Clean Air Together citizen science project, we know that in at least one location on the Phibsborough Road, Nitrogen Dioxide levels were three times the levels recommended by the WHO. However, these results are not part of a wider systemic monitoring of air quality levels in the city - it is vital that they should be into the future.

An additional strategic priority should therefore be added, setting out the clear aim of securing sufficient air quality monitoring stations to give a fully detailed and accurate picture of air quality in all parts of the country, especially in densely populated, high-traffic areas such as North Dublin City.

3. Promoting a Strong Policy Response for Better Air Quality

Recommendation: That the Clean Air Strategy does all it can to promote an urgent and comprehensive policy response to the challenge of poor air quality: including through promotion of active transport, reduction of private car journeys within urban areas, consideration of Low Emission Zones, meaningful support for retrofitting and sustainable home heating solutions, targeted support for lower-income communities and those most at risk from lower air quality, and greater dissemination and promotion of air quality research and monitoring data.

It is my strong belief that, by ensuring a more comprehensive view of air quality data, as set out in part two of this submission above, we will ensure a greater urgency in taking the necessary tangible policy actions.

The poor level of air quality in parts of our country is, along with housing, one of the greatest challenges that must be headed off in the immediate future.

It will be an essential mark of this Strategy's success, or otherwise, that we significantly increase the opportunities for active travel and ensure a major decrease in total car journeys within urban areas. Ultimately, the improvement of air quality can only be guaranteed through serious, large-scale actions to incentivise cycling, public transport use and sustainable, affordable home heating solutions in households within Dublin City.

Initiatives such as Low Emission Zones should be considered, as should serious expansion of existing retrofitting programmes, especially for lower-income households. At the heart of any action must be supports for the least advantaged who are, on average, the most exposed and the least able to take on the cost of mitigating actions.

The implementation of this Strategy should set out ways in which those communities most at risk of poor air quality can be meaningfully engaged with to ensure policy actions which are effective, fair and receive meaningful buy-in from those most impacted upon.

More publication of real-time localised air quality information by public bodies would also be key in increasing public awareness and activity on improving air quality, as would promotion of research to examine the real, specific impacts of poor air quality on health, wellbeing and community life.

Thank you for taking the time to review this submission. I wish you the best in finalising this important Strategy.

Best wishes,





[REDACTED], MEP for Dublin

[REDACTED]
[REDACTED]
[REDACTED].ie

Irish Welcome - *Cuirim Fáilte Roimh Ghaeilge*

Designated Public Official under the Regulation of Lobbying Act 2015
Oifigeach Poiblí Ainmnithe faoin Acht um Brústocaireacht a Rialáil 2015

2 May 2022

Air Quality Division by email: airquality@decc.gov.ie
Department of the Environment, Climate and Communications
Newtown Road
Wexford
Y35 AP90

Re. Clean Air Strategy Public Consultation

Madam/Sir,

Thanks for the opportunity to contribute to this consultation. I trust that you can consider the following issues and include them in your work.

Five Strategic Priorities

The priorities are good, but the fifth and final point could include informing the public of the types of air pollution, and utilising their knowledge of the issues. The fifth bullet point might therefore read *“To increase awareness of the importance of clean air, and to educate the public and utilise their knowledge in decision-making”* instead of the current wording: *“To promote and increase awareness of the importance of clean air”*.

Additional strategic priorities

Increasing the amount of monitoring locations would be appropriate, particularly in urban areas, with a focus on areas of deprivation that seem inadequately covered currently. Poor air quality occurs more frequently in areas of deprivation. The Strategy should investigate this and make recommendations for Government action where appropriate.

Such actions may include financial incentives such as grants or loans to change heating systems to less polluting fuels or appliances. It could also include public information campaigns. In addition, it may be useful to address the issue of indoor air quality. As homes become less draughty, the public need information on the importance of ventilation and minimum air changes per hour.

Better use of data

Providing a better dashboard or interface for the data that is informed by best practice from abroad would be advisable as a first step. This would facilitate better interaction with statutory authorities and agencies. It may be appropriate to host an annual symposium on air quality similar to the Road Safety Authority’s annual road safety lecture. If this proceeds, it would be appropriate to invite civil society actors to participate. Such actions could help drive actions on an annual basis.

It may also be appropriate to increase the amount of real-time air monitoring. Although this can be expensive, it is a useful way of gathering data that can assist in responding quickly to periods of poor air quality.

Current and emerging air quality issues

A constant theme over the last thirty years has been growing concern about the impact of smaller particles on human health. It may be advisable to focus on these concerns in the Plan's actions. It would also be useful to disaggregate the pollution from various sources including home heating, agriculture and transportation. A breakdown of the pollutant components would assist in formulating policies to address them. It may be useful to focus also on ammonia and ground level ozone.

Health impacts of air pollution

Presenting academic research in an accessible format would assist in increasing public awareness. There may be scope to present Irish health research to the media in a way that is accessible to a lay audience.

National clean air awareness campaign

It may be appropriate to link mortality data to county and city/town level. Such techniques have been used by the Road safety Authority, and may be useful in communicating the dangers of air pollution at a community or county level.

Metrics or Benchmarks

Presenting annual data disaggregated by source (as well as by pollutant type) could assist in increasing public awareness and actions.

Additional Comments

The City of London Clear Air Strategy has a clear vision to ensure that: "The Square Mile has air that is healthy to breathe." It also aims to reduce nitrogen dioxide to meet health-based Limit Values and WHO Guidelines in over 90% of the Square Mile by 2025 and support the Mayor of London to meet WHO Guidelines for PM10 and PM2.5 by 2030. Such clear and crisp metrics and messages would assist in communicating the strategy to the public. It also is well laid-out and is backed-up by clear graphics, maps and design. A similar approach should underpin the Irish Strategy.

It seems likely that the European Union will adopt World Health Organisation standards that set higher standards for air quality. The Irish Strategy should incorporate these into the Strategy, as they are evidence-based and proven to safeguard human health.

It may be worth listing within the strategy the policy changes that are required to make a difference at national level. This could include showing the importance of modal shifts that favour active travel (walking and cycling) or a move towards retrofitting homes that would lower the use of fossil fuels. It may be particularly useful to itemise short-term measures that can make a significant improvement in air quality such as not smoking in cars, or a thirty-second idling limit for vehicles parked in urban areas. It could also propose ultra-low emission zones for road transport in densely populated parts of cities where there are high levels of motorised traffic and emissions, such as Dublin's Liffey Quays, Amiens Street and Pearse Street.

I look forward to your consideration of all submissions received, and I wish you well in your work.

Warmest regards,



, MEP for Dublin



Clean Air Strategy for Ireland submission 2022



Today

The current Air Pollution Act is not sufficiently robust to respond effectively to the progress made since 1987 in monitoring air quality and understanding the impact air pollution has on our health and Earth's climate.

The main function of the 1987 Act is to provide a national Framework to allow compliance with EU Directives on matters such as limit values for a variety of airborne gases, vapours and particles.

The Act does not put the health and well-being of citizens as its *raison d'être*. And therefore, in my opinion, it should be scrapped in its current form and be replaced by legislation providing the public with exactly that.

There are a number of aspects of the current legislation that were inappropriate from conception and are also now outdated due to scientific/ medical progress.

Tomorrow

I would propose the introduction of a Clean Air Act for Ireland. The title alone would provide a positive aspiration as opposed to the negative message given by the words "Air Pollution".

Putting the health and well-being of us all front and centre in the new Act would allow a number of positive innovations.

Firstly, the new WHO Limits and recommendations on air pollutant concentrations should become the benchmark for the EPA to police alongside Local Councils.

Do not stop at the benchmark though. The overall ambition should be to make continuous improvements to all aspects of monitoring, modelling and eliminating air pollutants.

Particular attention should, of course, be paid to the three key chemical "issues" outlined in the public consultation document. But one important air pollutant that is important to our health and now increasingly understood to be of great climate consequence is missing. Ozone.

I see no reason why it should be omitted from your list of three. The EEA premature death statistics do give it proper mention (along with PM and NO_x). Furthermore, its increasing presence in the troposphere warms the planet and impacts our oceans.

Ammonia processing in the atmosphere is relatively well understood. But the heart of the matter is not only for Ireland's farmers to improve husbandry but also to eliminate the use of nitrogenous fertilisers.

They lead to the triple-N whammy of ammonia particulates from the processing of released nitrates. Nitrates/NO_x not only react with the ammonia to make secondary particles but also

can produce tropospheric ozone and nitrous oxide, which is a potent greenhouse gas and leads to stratospheric ozone depletion.

To do all of the above proposals would require an expansion of the EPA to further increase its monitoring, modelling, research, communication and educational activities.

Although great progress in monitoring real-time air pollution data has been made in Ireland since 2017, the AAMP needs to be much more ambitious. The network will have to extend over many more locations. It will require the setting up of one or two super-sites where ultra fine particles can be monitored alongside the full suite of air pollutants.

It will need to initiate and support hyperlocal measurements made by individual citizens and interested communities. Those are the measurements that will drive air quality policymaking in the future. And also the instigation of air pollution forecasts.

AAMP must link in much better with the media and public by providing real-time information as well as measurement. And not just newspapers and radio; display results at bus shelters, for example.

Secondly, the function of the Local Councils in enforcing regulations associated with, in particular, solid fuel burning must be clarified and more importantly be made sensible. They should also be allowed to set up both Clean Air and Low Emission Zones where they feel necessary because of road transport problems.

Encouragement of pedestrian zones would help alleviate hot-spot pollution. As would the development of local clean air strategies in all villages, towns and cities.

Currently the national activities resulting from the Air Pollution Act come strictly under the remit of the Department of the Environment. The Department of Health takes no responsibility. That should change.

We know much more now about the influence of air pollution on premature death and hospitalisations from conditions such as stroke, heart failure, cancer, asthma, diabetes, miscarriage, dementia etc. Hence active support and input from the Department of Health is a modern necessity to ensure that a Clean Air Act will work.

It should operate in tandem with the Department of the Environment to clarify/inform the public on issues such as the lethal effects that solid fuel burning have on family and neighbours, especially the most vulnerable in society. After all The Department of Health does have experience in changing public perceptions on the outcomes of smoking tobacco both as a primary poison and as second-hand smoke.

Educational campaigns mimicking cigarette packet warnings should be put on bags of coal, wood and peat saying: "Burning Solid Fuel Kills. It can cause heart failure, stroke, diabetes, dementia, miscarriage and lead to asthma attacks. Adverse health effects can also result from the direct effects of burning solid fuel on climate change".

Although the tabled Clean Air strategy document is well-researched and outlines many of the challenges to be faced in keeping our air clean it appears to provide little guidance or initiative in solving the really tough problems.

One of them is to strictly control some agricultural practices with legislation and enforcement. The party is over regarding national herd sizes, chemical fertilisers/pesticide use and also commercial turf mining. The time for road-maps is over. Reduce, prohibit and replace actions will speak louder than words.

The second is in educating the public and politicians about the health dangers associated with burning wood, coal and peat/turf. Currently it is like hitting your head against a brick wall to convince: I know from experience. Initiatives like the car-idling outside schools Bill should be supported; not ignored. How many people know that dry wood releases about as much toxic PM2.5 particles as smoky coal? Yet the DECC mantra is directed only toward the evils of wet wood!

The third is to promote the linkage between Northern Ireland and Ireland on all matters pertaining to air quality. The AAMP and Northern Ireland Air measurements should be combined into a common database. The trafficking of coal over the border should be stopped by agreement in this new cooperative environment.

The final challenge is one I alluded to above. The DECC and Department of Health must take joint responsibility for air pollution matters especially with regard to the financing of the EPA. Both inputs are required.

The outbreak of COVID throughout the world demonstrates that it is no longer sufficient for the EPA to focus on outdoor air pollution. It must pay more attention (beyond Radon measurements) to indoor spaces both domestic and workplace. It should follow the lead of the US EPA and instigate a "Clean Air in Buildings Challenge". The aim is to help building owners to both improve Indoor Air Quality and to protect Public Health.

Currently the EU have no quantitative limits for chemical and biological pollutants in offices, schools, public transport, hospitals and homes. Ireland should contribute to any EC initiatives and Directives in this regard. It will require the EPA to support the monitoring of indoor pollutant in many locations, at many levels and relating the measurements to health outcomes.

To achieve this goal means that they should bring together teams of air scientists, biologists, epidemiologists, health experts and building/ventilation engineers to devise strategies to be ready for the next round of EC funding on indoor air quality. There was a woeful lack of Irish participation in the last round because such interrelationships do not thrive in the research funding regime that the EPA currently operates under.

Reliable, legislative recommendations will require a much deeper understanding of indoor air quality regards the behaviour of biological aerosols such as spores, bacteria and viruses. In particular, the potentially synergic effects that result from the interactions between chemical pollutants with biologicals in aerosol form must be studied. Currently little is known.

The day after tomorrow

The ambitions of my Clean Air Strategy for Ireland over the next 10 years as described above are underpinned by the introduction of a Clean Air Act. Once that is in place new and expanded functions for the EPA must be assigned.

The EPA came into life as a result of the 1987 Air Pollution Act. I believe the new Act should bring an EPREA into existence, where R stands for Research and E means Education.

This body should not only perform its current normal duties of monitoring and licensing etc but also be charged with setting up Centres of Excellence. Air should be one. (Land and Water might be two others).

Talent should be cherry-picked to populate the Centres and sufficient finance should be made available to perform internationally competitive research on transport, fuel alternatives and agricultural emissions. There is also a crucial need for them to better educate the public, politicians and the media about the influence of good air quality on our health and climate.

The End

Current understanding of air quality and why it matters is poor over the connective triangle between public, politicians and the media. The recent debate on the mining and burning of peat provides a good example of the problems to be faced if Ireland's Air is to become cleaner and can reach the new WHO limiting values. There must be a clear movement away from the One Man and his Bog mentality to Mother Nature knows Best.

We must recognise the crucial link between outdoor and indoor air quality and the new EPA should not partition them.

There can be no better approach to improving our health and planet Earth's health than by the DECC performing this Clean Air scoping exercise.

But let the words turn into reality quickly.


19 April 2022

[REDACTED]
University College Dublin

Belfield

Dublin 4

Thank you for the opportunity to express my views in relation to the clean air strategy. As an academic working on childhood inequality and child policy I am particularly concerned about the impact of poor air quality on children. According to the WHO report [Air pollution and child health: Prescribing clean air](#) air pollution responsible and air pollution affects 93% of the world's children under 15 (1.8 billion children) to the point that "health and development at serious risk". For almost 1 in 10 deaths in children under five years of age. Children are more impacted by air pollution as "they breathe more rapidly than adults and so absorb more pollutants" .

In order to protect our children now and in the future we need action on the following issues:

- 1) Legislation for clean air standards
- 2) Enhanced Investment in public transport and in walking and cycling infrastructure
- 3) Invest in green spaces
- 4) Further pedestrianization of urban spaces
- 5) Ban on burning turf, coal and wood accompanied by enhanced support for retrofitting – full costs covered for low income households and
- 6) Investment in renewable energy
- 7) Establish a Citizen's Assembly and high-level task force on energy sovereignty
- 8) Urgent action on reducing agricultural emissions

With warm regards,

[REDACTED]