



Rialtas na hÉireann
Government of Ireland

Public Consultation on the National Clean Air Strategy

Summary of Responses

August 2022

1 Introduction

A public consultation on the draft National Clean Air Strategy took place from 7 March to 3 May 2022. This document provides an overview of the main points made across all responses to the consultation.

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 Strategy will complement the [National Air Pollution Control Programme \(NAPCP\)](#) which is a technical document which identifies the pathway to compliance for each pollutant based on a comprehensive cross-Government programme of policies and measures that will tackle all sources of air pollution, including those from the transport, agriculture and residential sectors. An updated NAPCP was submitted to the EU Commission in February 2021, and since then, the [2022 Informative Inventory Report \(IIR\) and national air pollutant emission projections](#) have been released.

The Strategy also builds upon the ambition of Ireland's Climate Action Plan which includes a range of actions required to realise the synergies between coherent air and climate policy. These include the electrification of the road transport fleet, taking action on ammonia, improving the energy efficiency of our homes and reducing our reliance on solid fuels.

The intention is that the Clean Air Strategy will be regularly reviewed in line with updates to the NAPCP, the annual air pollutant emissions and projections (known as the Informative Inventory Report (IIR)) produced by the EPA, stakeholder engagement and national policy developments.

The draft Clean Air Strategy set 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.

2 Consultation Process

Interested parties were invited to send their submissions by email or post to the Air Quality division of the Department of the Environment, Climate and Communications. An online questionnaire facility was also provided to cater for shorter responses, of up to approximately 500 words.

Respondents sending submissions by other means were also asked to consider the same questions, which were:

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?
3. How can pollutant emissions data be better used to inform actions at local and national levels?
4. What do you feel are the most important current and emerging air quality issues in Ireland that require further research?
5. How can we better increase awareness of the health impacts of air pollution?
6. What issues might a national clean air awareness campaign encompass and how could its impact be measured?
7. What particular metrics or benchmarks do you think should be considered in tracking the progress of a Clean Air Strategy?
8. Are there any other comments you have in relation to the draft national Clean Air Strategy?

The number of responses received across the eight weeks of the consultation period was as follows:

Week No.	1	2	3	4	5	6	7	8	Total
Email	1	0	3	1	0	4	16	81	106
Online questionnaire	2	1	0	1	0	1	0	0	5

This made a total of 111 submissions to the consultation before the stated closing date. Four others were received after the closing date.

While all five responses to the online questionnaire necessarily considered the key questions outlined above, only a small minority (less than 20) of those received by email did similarly. Others ranged from short submissions on single or localised issues, to detailed considerations of the issue of tackling air pollution, with reference to detailed reports and both scientific and medical research.

3 Overview of Responses to Key Questions

A summary of responses to the eight main questions listed above will be provided first, followed by an overview of points raised in other submissions received.

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

The five strategic priorities outlined in the draft strategy are:

1. To ensure continuous improvements in air quality across the country;
2. To guarantee the integration of clean air considerations into policy development across Government;
3. To increase the evidence base that will help us to continue to evolve our understanding of the sources of air pollution in order to address them more effectively;
4. To enhance regulation and improve the effectiveness of our enforcement systems;
5. To promote and increase awareness of the importance of clean air.

There was broad agreement and acceptance of the five priorities as stated. Others took the opportunity to also welcome the commitment to replace the Air Pollution Act 1987 with a new Clean Air Act, and to development new enforcement models in areas such as the sale, distribution and burning of solid fuels.

Some submissions were critical of the priorities as stated and the order in which they were presented. It should be noted that although numbered, they are not ranked in order of priority. There were comments that the draft Strategy is not ambitious enough and one commenter felt that it should state at the outset that “the Clean Air Strategy recognises that every person in the country has the right to breathe clean air”.

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

A number of submissions said that adoption of the revised WHO standards on air quality should also be a strategic priority. Others criticised the absence of the word “health” from all five strategic priorities, and suggested it either be included in an existing one (e.g. “To

ensure continuous improvements in air quality across the country, *to deliver better health outcomes for all*), or else added as a sixth priority in its own right (e.g., “To improve population health through improved air quality, and reduce health inequalities”).

A submission from a coal company suggested that another priority should be greater resources for tackling smuggling of bituminous (“smoky”) coal from Northern Ireland, as it avoids Carbon Tax and will be prohibited everywhere in the State once new regulations on solid fuels take effect. An associated suggestion in another submission was that it should be a priority to establish a formal cross-border approach with Northern Ireland on all air quality matters.

Other suggestions for additional strategic priorities included:

1. A commitment to further substantial investment in active travel infrastructure, and the development of an Active Travel Act.
2. A statement in support of a societal shift towards a more sustainable food system.
3. A commitment to tackle fuel poverty.
4. A formal linkage between the climate action and clean air agendas.

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

It was suggested that greater use could be made of the air quality data collected through the Ambient Air Quality Monitoring Programme (AAMP), with widespread regular reporting in local areas of latest trends, and recommendations on how to improve air quality through everyday activities.

It was further suggested that the EPA could have a greater role in ensuring Local Authorities investigate and enforce air quality matters.

One submission included detailed consideration of how the AAMP could be developed further to provide localised air quality information throughout Ireland that considers both spatial and temporal variation of air pollution.

Some maintained that the AAMP is nowhere near extensive enough, saying there should be monitoring stations at every school and on all busy roads in order to gather all data necessary to inform actions.

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

Some submissions pointed out that emerging evidence suggests air pollution is implicated in a wider range of health effects than previously recognised. They suggested that data from medical studies could be cross-referenced with data from air quality monitoring stations in order to better establish a measure of these links.

One said that other air pollutants, not addressed in the draft Strategy, are also emerging as threats to ambient air quality and public health, and that research and monitoring is needed in this area. Another submission gave microplastics as an example of this, saying “recent research has discovered microplastic pollution lodged deep in the lungs of living people for the first time, due to breathing in polluted air”.

There were calls for further research on the extent and effects of indoor air pollution, particularly in domestic settings. This would include research into the effects of household products containing volatile organic compounds (VOCs), such as cleaning products, aerosols and soaps.

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

The most common response was a call for a comprehensive public awareness programme, encompassing TV, radio, social media, and the printed press.

Other suggestions included improved access for the general public to air quality data and forecasts. While it was recognised that current and historic air quality data is available through the EPA website www.airquality.ie, it was suggested that the site could be made more intuitive and “user friendly”. It was also pointed out that many people, particularly those in vulnerable groups, either do not have online access or are not suitably proficient online, and so there should be more focus on disseminating air quality data through traditional media.

Several submissions said that awareness campaigns should be localised and personalised wherever possible – i.e. rather than informing about the atmosphere in general, they should provide people with specific information on the effects of localised air pollution on

themselves, their families, and their communities, and on steps they can take to bring about improvements.

It was also suggested that an independent advisory committee on the health impacts of air pollution could be established, to provide the necessary scientific evidence to inform public awareness campaigns.

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

The most common answers here were that an awareness campaign should contain two key messages: the impact of poor air quality on health, and steps that everybody can take to help reduce air pollution and deliver cleaner air.

Another repeating theme was that efforts should be made to make people more aware of indoor air pollution, particularly in their own homes.

There were a number of calls for the Department of Health and/or the Health Service Executive to take a more active role in communicating to the public about the health effects of everyday choices they make, which lead to poor air quality. A comparison was drawn to messages issued by the health authorities regarding the effects of passive smoking.

There was little comment on how the impact of a public awareness campaign could be measured. One submission pointed out that increased awareness does not necessarily lead to behavioural change. Another said that even if improved air quality was experienced after an awareness campaign, it may not necessarily be because of that campaign – e.g. a drop in solid fuel emissions might be due to warmer weather rather than people changing habits, or a drop in transport emissions might be due to people making fewer journeys because of rising fuel prices, rather than them switching to public or active transport.

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

There were widespread calls for adoption of the updated WHO standards on air quality, where some respondents want the new targets achieved immediately and others are seeking a commitment to achieve them by 2025, 2027, or 2030. In any event, the most common answer to the question itself here was that the best metric in tracking the progress

of the Clean Air Strategy would be a measure of Ireland's progress in achieving the new standards.

Others suggested strong enforcement standards, with regular measures of the number of enforcement actions taken against offenders.

One submission listed several statistical benchmarks which could be viewed as indicative measures of the success or otherwise of measures outlined in the Clean Air Strategy. These included:

1. The percentage of children walking or cycling to school
2. The percentage of new and second-hand car and van sales accounted for by full EVs
3. Percentage growth each year of EV charging infrastructure
4. Uptake of retrofitting grants
5. BER rating assessment results
6. Change in sales of fossil fuels and solid fuels
7. The number of hospital visits or admissions during poor air quality events

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

Answers to this question included the following points:

- Lists of specific actions to be taken, and the timeframes involved, should be included in the relevant chapters of the Strategy document.
- The Strategy makes no mention of indoor air pollution, and the effects on health it can have.
- The Strategy should provide for more consideration of air quality issues in the environmental assessment stage of the planning process.
- More detail should be given as to how the proposed working groups and fora that are mentioned in the draft Strategy will operate and interact (i.e. Cross-Government Air

Quality Implementation Group, Clean Air Research Forum, Clean Air Communication Strategy Group, etc.)

4 Overview of Other Responses

As previously stated, other responses ranged from short submissions on single or localised issues, to detailed considerations of the issue of tackling air pollution, with reference to detailed reports and both scientific and medical research.

Single or localised issues included people living in the vicinity of Dublin Airport calling for the scrapping of plans for an additional runway; a person unhappy with smoke from her neighbour's chimney; and a resident of a rural village which stands on a busy road calling for a bypass of that village to be built, to reduce transport emissions there.

There were some examples of a number of individuals sending the same submission material, in a petition-like manner. The first was how 22 people sent the following:

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.

A second example of a petition-like response was how submissions from eight other individuals consisted only of the following image:



Meanwhile, three people sent the same material calling for a reduction of the maximum of speed limit to 80 km/h on all roads, including motorways, saying this would drastically reduce emissions from road transport.

The majority of others, while acknowledging the need to tackle pollution and deliver cleaner air, were essentially basic “wish lists” of measures which could be taken, without any

consideration of the policy measures, financial implications, societal changes, etc., that would be involved.

Examples include “invest more in public and active transport”, “give 100% grants for retrofitting to all who need it”, “support farmers in moving away from dairy and beef practices”, and “ban all solid fuels immediately”.

A smaller number of submissions were more detailed, and these ranged in tone from highly supportive to extremely critical. For example, the submission from a major environmental group accused the draft Clean Air Strategy of being “not fit for purpose”, and “critically flawed in its scale of ambition, its urgency, and its scope”. It advised the Department to revise the Strategy in the following terms:

- Recognise the right to breathe clean air
- Legislate for World Health Organisation standards
- Increased specificity on implementation
- Legislate for Low Emission Zones
- Accelerate active travel modal shift
- Cancel the expansion of Dublin Airport
- Reduce ammonia emissions
- Fund a Just Transition for farmers
- Learn from other jurisdictions, particularly the United Kingdom and The Netherlands
- Develop a coherent plan for transitioning away from turf
- Avoid lock-in to natural gas infrastructure

On the other hand, another submission said that in general, air quality in Ireland is already very good when compared to the rest of Europe and is already improving through measures that are already in place. While considering that continued improvement of air quality in Ireland should be pursued, context should be given to the overall impact of any additional measures, current air quality, and other government policy pressures.

5 Next Steps

All submissions received are currently being reviewed in detail by the Air Quality team. Given the volume and range of responses we will not be in a position to provide detailed responses to each submission however where possible we will incorporate changes into the final text of the Strategy.

We expect to publish the Clean Air Strategy later in 2022.