



01/04/2021

Subject: Consultation on the Development of a new Solid Fuel Regulation for Ireland: Call for supporting evidence

Dear Sir/Madam,

The Irish Thoracic Society (ITS) is the representative body of respiratory healthcare professionals in Ireland, which is dedicated to promoting and protecting lung health. Our work in the area of air quality includes submissions to national consultations on Clean Air Strategy and the bituminous 'smoky' coal ban, and participation in the LIFE EMERALD (Emissions Modelling and FoRecasting of Air in IreLand) project, that aims to improve air quality information and awareness. We are proud supporters of the European Respiratory Society/European Lung Foundation commitment to action on air quality and we are a founding member of the Irish Lung Health Alliance. Furthermore, we were closely involved in the national indoor smoking ban and continuous efforts to encourage smoking cessation in Ireland.

The subject of air quality and climate change is immensely topical at present. The COVID-19 pandemic has highlighted the vulnerability of lung health, the indisputable link between climate change and the risk of future zoonosis, and the urgent need for global collective change to address climate change and protect air quality. The improvements in air quality associated with the first lockdown in 2020 demonstrated that we are capable of collective change in the face of a public health emergency, when there is a clear message, effectively communicated and grounded in scientific evidence. Irelands climate action plan in 2019 declared a climate and biodiversity emergency and the recent UN global climate poll of 1.2 million people in 50 countries, highlighted the global perception that climate change and the protection of air quality is considered an international emergency¹.

Air quality is of special importance to our society due to the specific effects of air quality on lung health. Indoor and outdoor air quality has direct and indirect effects on lung health and has been linked to the development of chronic respiratory conditions such as chronic obstructive pulmonary disease, lung cancer and premature deaths. Air pollution exposure can lead to objective reductions in lung function, increased respiratory tract infections and the exacerbation of respiratory conditions such as asthma. Furthermore, children are particularly vulnerable to the harmful effects of air pollution, as they typically spend more time outdoors and their lungs are immature; therefore any impairment in childhood lung development due to ambient air pollution can have lifelong implications. Prevention of these complications has meaningful effects on clinical outcomes and associated healthcare related cost savings.

Residential emissions are an important and often underestimated source of air pollution and fine particle emissions, and it is estimated that pollution from residential burning causes approximately 60,000 premature deaths each year within the European Union.² Therefore we strongly support the governments intentions to introduce a national approach to solid fuel regulation, and suggest the following:




- This should not be limited to coal products, but should also include other combustible products for residential use, including wood and peat products.
- A robust regulatory framework is necessary to facilitate the implementation, monitoring and enforcement of these essential measures to protect air quality.
- As highlighted by the COVID-19 pandemic, the people of Ireland are prepared to make considerable personal sacrifices in the interest of public health, when communication is clear and the evidence is strong. Therefore, the implementation of this regulation will require a public awareness campaign to highlight the immediate and long-term health and environmental benefits of the proposed new regulations. Additional educational material and further opportunities to engage with mitigation projects in all sectors should be considered, including residential, transport, industry, agriculture and energy sectors.
- Sustainable energy infrastructure requires additional development prior to the introduction of any new regulations. Programs that provide financial support for the use of these green energy sources should also be expanded.
- Inclusion, fuel poverty and socio-economic factors must also be considered. Disadvantaged homes are more likely to depend on older, less efficient technology and therefore it is imperative that we consider measures to support this group, with financial aid and dedicated support schemes in order to support the anticipated upgrading of appliances and heating systems, that will be required by numerous households. Initiatives such as the Warmth and Wellbeing Scheme have been very effective in this regard and should be developed further.

The COVID19 pandemic has provided an opportunity to reimagine our future, prioritise and protect lung health and air quality. The government's intentions to implement a national ban on 'smoky' coal and tighter controls on solid fuels, reinforces their commitment to this global emergency and will serve as a model for other countries to follow.

Regards,




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References:

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2. Danish Ecological Council. 2016. POLLUTION FROM RESIDENTIAL BURNING, Danish experience in an international perspective. 1st edition; www.clean-heat.eu & www.ecocouncil.dk