



The Clean Air Plan for Wales

Healthy Air, Healthy Wales

CIEH response to consultation

March 2020

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Any enquiries about this response should be directed to:

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Key Points:

CIEH welcomes the Clean Air Plan for Wales which demonstrates the Welsh Governments commitment to improving air quality. While the Plan includes a comprehensive range of actions to improve air quality they are not consistently SMART and further information is required on how actions will be funded.

Proposals for a Clean Air Act for Wales, enshrining World Health Organisation (WHO) Air Quality Guidelines are supported.

Section Title	Questions
<p>The Clean Air Plan for Wales - Thematic Approach and Commitments</p>	<p>1. Does the thematic approach in the Clean Air Plan bring together the key air quality issues in a way that is clear and helpful way?</p> <p>CIEH welcomes the thematic approach adopted in the Plan although the theme <i>Improving air quality to support sustainable places</i> is confusing as it relates largely to transport.</p> <p>There is significant overlap across the themes and to deliver improvements there will need to be collaboration across organisations and policy areas.</p>
<p>Air pollution and health</p>	<p>2. Do you agree enhancing monitoring and assessment capabilities will help to understand and inform action to reduce the impacts of air pollution on health and well-being in Wales? Please provide evidence in support of your views where possible.</p> <p>CIEH supports the Welsh Government's commitment to enhanced monitoring and assessment which will inform action to reduce the impacts of air pollution on health and well-being.</p> <p>Whilst we agree sensitive receptors and locations e.g. schools, hospitals, care homes should be prioritised, it is not clear how these will be identified and once they are identified how they will be prioritised. Further, it is not clear how the proposed new national air pollution monitoring network will be funded.</p> <p>3. Do the commitments and actions for health and well-being address the most important factors for improving air quality and realising health benefits?</p> <p>Given the known health impacts, we welcome the Welsh Government's ambition for levels of PM_{2.5} to be below WHO guidelines and to put this ambition into law. Proposals to develop and consult on new targets for particulate matter in Wales and proposals to investigate the extent to which local authorities could support monitoring and action on PM_{2.5} are also welcomed.</p>

	<p>Any additional monitoring required by local authorities will need to be subject to the availability of additional funding.</p>
<p>Local Air Quality Management (LAQM)</p>	<p>4. Are you satisfied the proposals for Local Air Quality Management will result in robust, effective air quality management arrangements?</p> <p>The commitment to ensuring EU environmental standards are met and, where possible exceeded and local authorities' monitoring strategies are proactive and robust are welcomed.</p> <p>The public health impacts of poor air quality are not just confined to Air Quality Management Areas. This must be recognised in proposals to strengthen the Local Air Quality Management regime.</p> <p>Local authority powers to deal with vehicle emissions and idling should be reviewed and if necessary updated.</p>
<p>Area-specific policies and the designation of air quality improvement areas/zones.</p>	<p>5. Are you satisfied with the proposed approach for Clean Air Zones/Low Emission Zones in Wales?</p> <p>CIEH responded to consultation on a proposed Clean Air Zone Framework for Wales in 2018 and supports the proposals. Clean Air Zones may be successful in urban centres well served by alternative modes of transport and/or routes. However, they will not be enough on their own to improve air quality overall. Wider wholesale changes are required to reduce emissions at source.</p> <p>There are too many private cars on the roads and too much reliance on them. Public transport needs to be improved to provide a viable alternative option, especially in rural areas.</p>

Domestic Combustion

6. Do you agree with the proposals for tackling air pollution from domestic combustion?

Domestic burning of solid fuels is thought to be the largest single contributing source of PM_{2.5}.

Proposals to eradicate all emissions from domestic sources are probably unrealistic given that some people rely on solid fuels as the primary means of heating their homes. The impact on fuel poverty could be significant. A ban on domestic burning would be unmanageable and not enforceable. The fashion for wood burners as a secondary heating source is contributing to the rise in particulate emissions in urban areas. We would support a phased approach to reducing domestic emissions e.g. prohibiting the sale of the most polluting solid fuels e.g. wet wood and traditional house coal and regulating to ensure appliances are regularly maintained by qualified professionals. A public information campaign and discounted cleaner fuels would also be welcomed.

Proposals to look at measures to reduce emissions from outdoor burning are of interest. Local authorities use the statutory nuisance provisions in the Environmental Protection Act 1990 to deal with garden bonfires, although the effectiveness of these powers to deal with one off or occasional intermittent events is limited and investigations and prosecutions are resource intensive.

We have been advised by our members working in local authorities that reductions in the frequency of refuse collections and tighter controls at waste transfer stations have led to increases in flytipping and the burning of domestic waste in residential gardens. Research to back up these claims may provide evidence of the need for alternative sanctions e.g. fixed penalty fines.

	<p>7. Which aspects of Smoke Control would you like Welsh Government to consider or strengthen?</p> <p>We support the proposal to amend primary legislation to move from updating lists of exempted appliances and authorised fuels in Statutory Instruments to publishing the lists online .</p> <p>Proposals to raise awareness through education on the use of appliances and appropriate fuels are supported.</p> <p>We are not convinced of the need for restrictions on the use of barbecues, chimneas, pizza ovens, firepits unless it is supported by evidence.</p>
<p>Integration of area specific policies</p>	<p>8. Are you satisfied with proposals to deliver a more integrated air quality management approach? If no, please provide evidence to support other alternatives.</p> <p>Yes but more information about how this would work in practice would be welcomed.</p>
<p>Indoor Air Pollution</p>	<p>9. Are there aspects of indoor air pollution which you would like Welsh Government to address? You may wish to consider what the Welsh Government's top priorities should be for regulating chemicals in articles and products which may contribute to poor indoor air quality.</p> <p>CIEH recognises that indoor air quality could have a significant impact on health and well-being. Many people spend a significant amount of time in their homes but little is known about the impact of indoor air pollutants on their health. We support proposals to develop and respond to new evidence.</p>
<p>A Clean Air Act for Wales</p>	<p>10. Do you support the proposals for a Clean Air Act for Wales?</p> <p>CIEH supports proposals for a Clean Air Act for Wales that enshrines in law WHO Air Quality Guidelines.</p>

	<p>11. Are there additional issues a Clean Air Act should address?</p> <p>Legislation should require local authorities to assess the resources required to implement the requirements of the Act and set out their plans to address any identified shortfalls.</p> <p>12. What other legislative or regulatory actions in relation to air quality should we consider to improve people’s lives and community well-being in a sustainable way?</p> <p>Identification of alert thresholds for key pollutants and a requirement to alert people during peaks.</p> <p>Remove exemptions to emission standards for off road vehicles and generators.</p>
<p>Public awareness about airborne pollution</p>	<p>13. Citizen science projects to date have focused on work with young people. Are there other age groups or communities would you like to see us work with?</p> <p>An understanding of airborne pollution is important for all age groups. Tackling poor air quality requires public support. That will only be achieved if the public clearly understands the nature of the problem, how they are contributing to it, how it affects them and what they can do about it.</p> <p>14. Which age groups do you think would benefit most from greater understanding of air quality, pollutants, evidence and interpretation, and developing personal awareness and responsibility?</p> <p>15. Are there other approaches or opportunities to develop greater understanding of air quality issues that you think we should explore?</p> <p>16. Do the proposed communications work streams provide a suitable focus for air quality communications and behaviour change work?</p>

	<p>17. Are there features you would like as part of the Air Quality in Wales website?</p> <p>18. Are there specific communications and behaviour change campaigns you would support?</p> <p>19. Are there age groups or communities who could contribute to developing citizen science projects?</p> <p>20. Which age groups would benefit most from developing personal awareness, understanding and responsibility in terms of air quality and pollutants?</p> <p>21. Are there additional approaches or opportunities to develop greater understanding of air quality issues that should be explored?</p>
<p>Improving air quality to protect the health and well-being of current and future generations - commitments and actions</p>	<p>22. Do the proposed commitments and actions address the issues described in the health and well-being section of the Plan?</p> <p>Yes</p> <p>23. Do you agree the actions will help to reduce the impact of air pollution on health and well-being in Wales?</p> <p>Yes</p> <p>24. What additional commitments or actions would you propose?</p>
<p>Improving air quality to support our natural environment, ecosystems and biodiversity</p>	<p>25. What sorts of nature based solutions could be promoted to help to reduce human exposure to air pollution?</p> <p>26. How can we speed up the recovery of our biodiversity and ecosystems alongside emission reduction?</p> <p>27. What activities can we emphasise in our environmental growth plan to help tackle air</p>

	<p>pollution and its impact on ecosystems in Wales?</p> <p>28. Do the proposed commitments and actions address the issues described in natural environment, ecosystems and biodiversity section of the Plan?</p> <p>29. Do you agree the actions will help to reduce the impact of air pollution on natural environment, ecosystems and biodiversity in Wales?</p> <p>30. What additional commitments or actions would you propose?</p>
<p>Industrial Air Pollution</p>	<p>31. On which sectors, processes or areas should we focus our action to reduce public exposure to industrial emissions to air pollution?</p> <p>We agree that there should be a focus on the most polluting industry sectors influencing public exposure and recognise that Neath Port Talbot and the Swansea Valley have particular problems. However, we recognise the need to address industrial emissions across the whole of Wales in a range of sectors.</p> <p>32. Are there any specific legislative changes you think we should consider in order to tackle industrial emissions to air?</p> <p>CIEH supports the proposal to maintain the existing Environmental Permitting regulatory regime. Fees and charges have been static in Wales for the last 4 years and we have been advised that in many cases no longer cover the cost of providing the service. Fees and charges should be revised to reflect the costs of providing the service.</p> <p>CIEH supports ongoing development and application of Best Available Techniques (BAT) for pollution control which is central to that regime. Additionally, consideration should be given to new regulatory controls on combustion plants in the 500kW to 1MW thermal input range.</p> <p>33. Are there any specific actions or measures with which we can encourage investment by industry to reduce air pollution?</p> <p>34. Are there any specific actions or measures with which we can encourage investment by industry to reduce air pollution?</p>

	<p>35. Do you think generators used for research and development should be treated differently in terms of emission controls?</p> <p>No, emission controls for generators used for research and development purposes should be reviewed.</p>
<p>Improving air quality to support a prosperous Wales - commitments and actions</p>	<p>36. Do the proposed commitments and actions address the issues described in the Prosperous Wales section of the Plan?</p> <p>We agree that economic progress and environmental protection do not need to be mutually exclusive and that this should be recognised in the Plan, but this theme reflects an ad hoc collection of commitments and actions.</p> <p>Taking the commitment to change waste collection vehicles to run on electricity/hydrogen as an example, it is not clear why this appears in this theme as opposed to another. Whilst we are supportive in principle, it is important to recognise that in some areas suitable vehicles are not available and more development and investment is required.</p>
<p>The National Infrastructure Commission for Wales</p>	<p>37. Should air quality issues be referenced in the remit of NICW?</p> <p>Yes, the NCIW together with regional and local development planning must consider air quality.</p>
<p>Transport</p>	<p>38. Are there other air quality matters relating to transport which Welsh Government should consider or review?</p> <p>Imposition of conditions on rail franchises from 2020 to replace a proportion of diesel trains with electric, hybrid technology or hydrogen.</p>
<p>Improving air quality to support sustainable places – commitments and actions</p>	<p>39. Do the proposed commitments and actions address the issues described in the Plan?</p>

	<p>The general direction is supported, but more detail is required</p> <p>40. Do you agree the actions will help to reduce the impact of air pollution to support sustainable places in Wales?</p> <p>41. What additional commitments or actions would you propose?</p>
Welsh language	<p>42. We would like to know your views on the effects the <i>Clean Air Plan</i> will have on the Welsh language, specifically on:</p> <ul style="list-style-type: none"> a. opportunities for people to use Welsh; and b. treating the Welsh language no less favourably than the English language. <p>43. What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?</p> <p>44. Please also explain how you believe the proposed Plan could be formulated or changed so as to have:</p> <ul style="list-style-type: none"> a. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language b. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.
General question	<p>45. We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please use this space to report them.</p>

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Submit your comments by **10 March 2020**, in any of the following ways:

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