**Submission**

*Public Consultation to inform the development of a National Clean Air Strategy*

**Prepared by**

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**Introduction**

For the purposes of this submission we will refer to the “Cleaning Our Air” discussion document published by the Department of Communications, Climate Action & Environment. Specifically sub-sections of Chapter 4 will be addressed.

While the air we breathe is of the utmost importance to this and every generation to come the steps we take to ensure air quality into the future must be effective and make sense in the context of a recovering economy. The state should lead by example in a practical and sensible fashion in order to ensure the air we breathe is clean. The practicalities of rural life have to be taken into consideration when drafting any government policy but in particular when drafting policy related to the environment in which we live.

The public should be incentivised toward using less polluting and more efficient sources of energy but those who cannot afford to transition or for whom it is not practical to do so should not be penalised further than they already have been.

This submission is produced with the key philosophy that jobs must be preserved. Where possible new jobs must be created but they must be sustainable. Rural dwellers cannot be penalised purely as a consequence of their geography when it comes to clean air policy.

**Sectoral Issues & Challenges**

**Ref . 4.2 – Residential Sector**

Carbon Tax Relief for Clean (low smoke), Low Carbon Solid Fuels which was initiated in Budget 2017 is a positive step in the right direction. Perhaps in order to incentivise the use of better quality products, consideration should be given to expanding this relief in forthcoming budgets.

A nationwide coal ban is a radical suggestion and the affects would be wide ranging. Such a move cannot be allowed to happen as it is a breach of the fundamental philosophy of freedom of choice. The general public who are in the lower socio-economic bracket for whom solid fuel is the most cost effective form of heating, need to be considered. Any move that would impact low income people and families must ensure that the issue of fuel poverty does not become a result of government policy.

Any decision by the state that would have a negative impact on private individuals or private businesses cannot be let happen with-out the consent of those affected.

The state must lead from the front and not drive from the back when it comes to transitioning away from dependency on solid fuels. Through a number of existing schemes, in particular those administered by the SEAI and local authorities; improvements to the existing housing stock regarding their energy efficiency etc. the state has played an important role in reducing residential fuel consumption. Schemes of this nature should be expanded as they are consumer lead and are effective as they work with people and communities to achieve results. It will be by expanding this scheme and other the state will reduce fuel consumption – in all forms. Retrofitting of homes, businesses and community buildings through state-aided grants will ultimately be the most practical solution to reducing air pollution caused by the residential sector.

Whilst the state wishes to incentivise people away from the use of peat and turf products; it is by far the most cost effective form of home heating for thousands of people across the country and hundreds are employed in the industry.

It is fundamental that individual freedoms are not negatively impacted by government policy. It should be the right of every individual in the state to cut their own turf, for their own use, in their own bogs. The government should lead from the front and as has already been noted in the discussion document – in that, the Bord na Mona Sustainability 2030 report, this report details BNM’s commitment to replace large scale peat production with alternative energy sources including biomass, wind and solar by 2030. Jobs in BNM must be protected.

A full analysis must be carried out with regard to the real environmental and economic benefits and/drawbacks of wind energy – aside from life-long noise pollution from conventional wind energy production and the series of other environmental drawbacks; there absolutely must be a full analysis done as to the environmental impact of the production, erection and afterlife demolition must be conducted. The overall footprint of wind energy from the beginning of production to the end of life cannot just be compared to fossil fuel energy sources but it must be compared to other alternative energy sources such as solar and biomass. The sustainability of wind energy as an electricity producer has been called into question internationally. Whilst the technology is developing, the impact of communities in densely populated countries such as Ireland too needs to be considered.

Our clean air needs to be achieved through working with communities and good planning with regard to energy policy can have a real impact on this with-out much additional cost.

Whilst the use of wood a residential heating source is low much of its use is concentrated and it would be reasonable to assume this would affect air quality in some areas more than in others. Incentives could be introduced at a local level to incentivise the use of higher quality fuels and perhaps a public information campaign can be conducted in wood burning regions to inform the public of the benefits of using higher quality wood fuel – highlighting the possible false economy created by purchasing cheap low quality fuel.

Ecodesign regulations would represent significant governmental over-reach. Whilst the intention behind the regulations might be good, it makes it more difficult for smaller operators to compete with their larger competitors. If the government wish to improve the design standards of fuel burning products the carrot as opposed to stick approach should be taken through the introduction of incentives and grants for consumers to purchase or upgrade their existing appliances.

**Ref. 4.3 – Transport Sector**

The particle matter emission caused as a result of road transport is indisputable. However, tackling this should not be done through punitive means. Particularly in rural regions, the use of road transport is an essential part of daily life. Rural dwellers should not be disadvantaged by any government policy in this regard.

While various measures noted in the discussion document are relatively benign such as the DPF matter raised; proposals to tax diesel in order to bring its price more in line with petrol in an effort to combat air pollution is a poor approach and one which cannot be allowed to take place.

The governments approach to combating air pollution with regard the road transport should be in essence focused on, as is alluded to in the discussion document, improving the public transport fleet. Incentives should also be introduced to improve the efficiency and affordability of non-fossil fuel powered vehicles. As is the issue with the production of wind energy sources, little or no consideration is generally given to the impact of producing electric cars and their components. Not to mention that electric vehicles need to be powered by electricity, this must too be produced with the environment in mind.

The government should strongly consider the option of hydrogen powered vehicles. Hydrogen highways have been developed in California and Italy and mainstream car companies have already produced hydrogen vehicles for sale on the market. While all options should be explored all options must be scrutinised to see how effective they really will be in combating air pollution.

As of 2016, there are 3 hydrogen cars publicly available in select markets; the Toyota Mirai, the Hyundai ix35 FCEV, and the Honda Clarity. Several other companies are working to develop hydrogen cars. As of 2014, 95% of hydrogen is made from natural gas. It can be produced using renewable sources, but that is an expensive process. Integrated wind-to-hydrogen (power to gas) plants, using electrolysis of water, are exploring technologies to deliver costs low enough, and quantities great enough, to compete with hydrogen production using natural gas. The drawbacks of hydrogen use are high carbon emissions intensity when produced from natural gas, capital cost burden, low energy content per unit volume, production and compression of hydrogen, and the large investment in infrastructure that would be required to fuel vehicles.

While the technology required in order to bring Hydrogen vehicles to the masses may still be decades away the reality remains that oil and gas are not indefinite sources of fuel for road transportation. In addition, clean air policy should be planning for more than the term of one or two governments. It is the generations to come for whom we should now be planning. The people will likely most noticeably benefit from clean air policy may not yet be born. The private sector has a natural incentive to win the sustainable energy race too and Ireland could act as a catalyst for scientific advancement and development should we so chose with-out spending millions of tax-payers money in order to achieve sustainable change.

The creation of LEZ could be affective at combating air pollution in larger cities but any such move should be done in a measured and weighted manner to ensure that stakeholders such as individuals travelling to hospital appointments or on essential business are not disproportionately affected. So too must the infrastructure be developed to accommodate such changes and reduce the populations dependency on private vehicle transport in urban centres. In the alternative, significant investment in “Park & Ride” infrastructure should be considered before or perhaps in concert with the consideration of LEZ’s. People do not want to be commuting by car into urban places but the alternative need to be attractive. By ensuring the public transport infrastructure is in place and efficient the government can further encourage the reduction of air pollution by the transport sector. Before any move on anything Park and Ride must be put in place and it must be free or cost cost neutral to consumers.

**Ref. 4.4 - Agriculture Sector**

Agriculture is the backbone of the Irish Economy, schemes such as TAMS and GLAS can have a great influence on improving agricultural practices. Using the carrot rather than the stick in way will yield more positive results for farmers, communities and government. There can be no suggestion of reducing the national heard through culling. The reality is that if government wish to improve the quality of the national herd such action must be practical and sensible. Genuine attempts to improve the efficiency of the national herd would be welcome but it must be done in conjunction with the farmers of the country.

The success or otherwise of schemes such as GLAS, TAMS and LESS will depend largely on reducing red-tape and making schemes more accessible to farmers. Policy should reflect that participants are given ample flexibility to ensure they can complete selected measures without fear of retribution from the department where the practicalities of daily farming life cause delays etc. Increasing the financial benefits and reducing the regulatory drawbacks of schemes of this nature could seriously assist government in reducing air pollution.

Should the government wish to pursue LESS and restrict or ban splash plate slurry spreading then the cost for farmers and contractors of upgrading their equipment must be funded entirely through government grants as to expect operators to upgrade perfectly good equipment in order to comply with new regulations is unreasonable.

Anaerobic digestion facilities could play a much larger role in farm waste management. The private sector with the right incentives could facilitate the capital investment required to establish additional facilities in areas where demand would be higher. Government policy could support the expansion of the existing stock of facilities and incentives to farmers to utilise such facilities could be extended under schemes such as GLAS.

The issue of agricultural burning let it be prescribed for the purposed of landscape management, or for the purposes of green waste burning is one which needs to be looked at in a practical sense. The illegal practice of burning non-green waste too can be simply tackled by local authorities increasing the number of collection/bring points and reducing the cost of access to same. Greater enforcement while far more expensive may yield limited results. Bans in this regard will not work.

**Ref. 4.5 Energy Sector**

Electricity generation is a significant contributor to air pollution. However, it doesn’t have to be. Wind energy has too many drawbacks to be effective in the long-term and biomass is heavily reliant on the import of biomass fuel, we don’t currently have enough wood to supply existing saw mills, while solar and wave are developing technologies which are becoming more efficient as a sustainable means of electricity generation. All alternatives should be explored and scrutinised to ensure vast sums of money are not invested in inefficient methods of electricity production.

Solar in particular is entering era with both the private and public sectors across the world embracing the potential the technology is realising. In the USA SolarCity Corporation was recently acquired in full by TESLA Inc., the pioneering company has lead the way in the development of solar energy networks in the USA. The DCCAE could perhaps collaborate with companies of this nature in developing the role of solar energy here in a sustainable fashion, learning from the mistakes they would have made and developing policy in a manner that will be successful. Solar policy should be developed such as ensure they do not negatively impact on communities.

Wave and Tidal technology too should be developed further, while wave technology as a means of electricity generation dates back as far an 1890, the technology is still in a state of commercial infancy. As an Island nation we should explore all the possibilities at our disposal and ensure that any investment we make is made prudently with due consideration having been given to every element of every possibility.

If government policy is going to pursue wind as an alternative energy source then it must be restricted to off-shore development. It is my view that it is uneconomically in any case. Biomass too which is heavily reliant on imports and as is alluded to in the discussion document; may not be as pollutant reducing as would be desirable, needs serious scrutiny. Any source that is found to be unsustainable with-out long-term government subsidisation cannot be progressed. In the race for reducing air pollution we cannot do so in haste simply to satisfy a green agenda at any cost. Yes, air quality if vitally important to us all but it would be more affective to wait until a long term sustainable solution if developed and agreed upon before making huge capital investment. Research and development therefore should be key in deciding how we as a nation should progress on agriculture, energy, transport and environment policy.

The option of purchasing our power more cost effectively from mainland Europe where countries have embraced nuclear should be considered and explored.

**Ref. 4.6 – Industry and other sectors**

The contribution to air pollution by industry should be managed by means of regulations on the elements of industry which most affect the communities in which they are located in a negative manner. In that, should the effects of industry be such that neighbouring persons or communities are impeded upon then appropriate regulation should be increased in order to ensure the operations do not negatively impact on those in their proximity. Regulatory power where possible and practical should be vested in local authorities.

With respect to the elimination of landfill and its replacement with reducing, reusing and recycling waste; it is a lofty ideal and one to which we as a nation should aspire. While at the same time consideration should be given to the financial implications of any such policies and all options should be explored.

**Conclusion**

Clean Air Policy is important. However, the state should not be rushing to invest ungodly sums of money in capital projects simply to satisfy a green agenda. Calculated steps need to be taken to ensure the path we chose on sustainable energy for every sector which is the route of the vast amount air pollution; is the right one and that the investment will yield the desired results.

Jobs are of paramount importance and government policy must always be pro-jobs, it cannot be allowed to result in jobs losses. The state should leads from the front and private individuals and bodies cannot be negatively affected by government policy. Punitive measures will not work and cannot be seen as the route forward to combat air pollution or and socio-economic issues.

Whilst we all want good air quality, it cannot be at any cost. We must be wise in how we move forward and ensure the actions we take are not taken purely to say we are doing something. The state only has limited resources which are provided by the tax payer; and they must be invested wisely.

People need to be able live in work in their areas in a realistic and practical manner. Rural Ireland cannot be allowed to suffer as result of government policy. Idealistic aspirations are great but jobs are the lifeblood of society and policy that negatively impacts same cannot be tolerated.