

Dublin City Council
Submission on
Cleaning Our Air
Public Consultation to inform the development of
A National Clean Air Strategy

Introduction

Dublin City Council welcomes this initiative by the Department of Communications, Climate Action and Environment to develop a National Clean Air Strategy.

The Strategy is intended to provide the strategic policy framework necessary to identify and promote the integrated measures across government policy that are required to reduce air pollution and promote cleaner air while delivering on wider national objectives.

Given a number of recent developments, including (i) the improved scientific understanding of the health and environment damage caused by air pollution, (ii) the revised World Health Organisation estimates of air pollution's public health impacts, and (iii) the recently finalised EU Clean Air Package legislation, it is timely to issue this consultation paper to inform the development of a national clean air strategy in order to address the challenges and impacts of air pollution.

The consultation document issued on 1 March 2017 provides a background to the national, EU and international approaches to improving air quality. It seeks to set out the main sectoral issues in relation to air quality which are of relevance, and for which further actions could be considered in a national clean air strategy. The main issues are identified, based on the overall importance of the emission sources, the consequential public exposure to air pollution, and the resulting health and environment impacts.

The consultation document is set out as follows:

Chapter 2 provides a background to air pollution, health and environment impacts;

Chapter 3 sets out relevant policy and legislation at national, EU and international levels;

Chapter 4 outlines the sectoral issues and challenges addressing emissions from residential (4.2), transport (4.3), agriculture (4.4), energy (4.5) and industry (4.6);

Chapter 5 details the air quality monitoring, modelling and forecasting arrangements in Ireland;

Chapter 6 summarises the current state of air quality research in Ireland;

Chapter 7 addresses the issues of communication and awareness in relation to air quality;

Chapter 8 sets out the timeline for development of the National Clean Air Strategy.

Format of this submission

The consultation document has been tailored to facilitate a structured response, with a number of questions set out at the end of each chapter. Respondents are encouraged to choose how they respond, and may choose to respond to particular questions relevant to them, or to respond on the issues of concern without addressing the questions.

The former format has been adopted as far as possible for the purposes of presenting this Dublin City Council submission.

Chapter 2 - background to air pollution, health and environment impacts (See Page 12)

Consultation questions – A Vision

1. Do you have a view on what the main elements of a vision for clear air in Ireland should be?

Dublin City Council agrees with the Department that the implications of poor air quality on human health are indisputable and the growing body of research clearly demonstrates the health, social and economic imperatives to take action. Therefore protecting human health must be at the core of the national clean air strategy.

Dublin City Council is cognisant of the Environmental Protection Agency projections released on 13 April 2017, showing Ireland will not meet its 2020 EU greenhouse gas emission reduction targets with the current range of policy measures. The latest figures demonstrate the need for new and innovative measures to meet the challenges that Ireland faces in making the transition to a low carbon economy.

Currently the “Vision for Clean Air in Ireland” would seem to concentrate on compliance with the various EU directives and limit levels. The emphasis must be placed on ‘protection’ rather than compliance - - that is to protect those many regions in Ireland that have clean air and preserve them as ‘Clean Air’ zones.

Adopting a ‘Protection’ approach would require real commitment to the meaning of ‘Sustainable Development’ and a cultural change in governmental departments “silo” approach towards actions \policy \ programmes that have potential negative air quality impacts.

Dublin City Council therefore asserts that the National Clean Air Strategy cannot simply be an iteration of existing policies but must be innovative, cross-sectoral and disruptive.

- ***Should consideration be given to going beyond statutory compliance with EU standards as set out in EU legislation, and moving towards WHO guideline values in line with the EU 7th Environment Action Programme?***

A graduated move towards WHO guidelines is desirable and has been initiated in other jurisdictions. As current air quality levels do not meet WHO guidelines, fundamental policy and legislative changes would be required across a range of areas.

The sole aim of 'statutory compliance' should not be the driver behind this policy. 'Prevention' should be the most significant 'driver' and procedures should be developed to quantify the significant impacts of, and targets for any 'preventative measures' undertaken

- ***Are there areas where the national monitoring and research network could be enhanced or augmented so that it can better inform clean air and climate policy?***

Plans by the Environmental Protection Agency to effectively double the number of air monitoring stations in the national air monitoring network are commendable, but this needs to be matched with enhanced means of making the data accessible and available in real time to the public and policy makers.

Recent studies funded by the EPA indicate that air quality in some regional towns around Ireland is poorer than in larger urban centres. This merits further research to form a fuller picture of air quality in across Ireland.

2. ***Are there any other issues you wish to raise in relation to a vision for clean air in Ireland?***

The uncertainties surrounding the implications of "Brexit" also have implications for transboundary air quality and also controlling the marketing, sale and distribution of solid bituminous fuels across the border. Brexit may make a "whole island" approach to improving air quality far more complex than it currently is, but a "whole island" approach is to be desired.

Chapter 3 - relevant policy and legislation at national, EU and international levels;

(See Page: 21)

Consultation Questions – Clean Air Policy & Legislation;

1. Are there aspects of the Air Pollution Act 1987 that need to be updated so that it remains fit for purpose for the 21st Century?

The introduction of The Air Pollution Act 1987 represented a step change in addressing air quality in Ireland. That said it has in many respects been overtaken by provisions of subsequent legislation including the Environmental Protection Agency Act 1992 and the Protection of the Environment Act 2003. To further compound this situation, the Air Quality Standards Regulations 2011 have parallel and sometimes contradictory provisions in relation to air quality management. Some of the provisions of the 1987 Act have also been demonstrated on application to be impractical.

Dublin City Council recommends that rather than tinker around the edges with the existing Act, a new Clean Air Act should be developed.

2. Do the provisions of the Air Pollution Act, 1987, specifically sections 24 and 26, provide effective tools for local authorities to address the negative impacts of air pollution?

Sections 24 to 29 deal with the powers and remedies available to deal with persons causing air pollution. Their effectiveness is greatly undermined by the generality of the good defences provided in such situations. In practice this has made obtaining convictions in court very difficult. These provisions put local authorities in a very invidious situation where it is clear that air pollution or emissions are occurring but the courts are bound by the vagueness of the legislation, and the high burden of proof required for a conviction (i.e. beyond all reasonable doubt)

3. Do the provisions in relation to local authority licensing of industrial emissions in Part IV of the Act continue to be fit for purpose?

This would appear to be a typographical error in the consultation document as Part IV of the Act relates to Special Control Areas.

Part IV of the Act was demonstrated to be wholly unworkable at the time of the efforts to introduce the ban on bituminous coal in Dublin in the late 1980s. It was as a result of this impasse that the then Minister of State saw fit to introduce regulations in 1990 banning the marketing, sale and distribution of bituminous coal under other provisions in the Act.

Part III of the Act deals with Licensing of Industrial Plant. These provisions were effectively superseded by the establishment of the Environmental Protection Agency and the introduction of licensing systems under their remit.

This has led to various anomalies as there are activities which are not regulated either under Part III of this Act or by the EPA - e.g. crematoria. Another anomaly is that as the scheduled activities in the Air Pollution Act 1987 do not line up with the

activities regulated by the EPA, in the event that an industrial operation lowers production levels it may fall below the threshold required for an EPA licence but does not subsequently fit into a category of activity regulated by a local authority.

4. Are the fines and penalties for breaches of licences in relation to air pollution sufficient to act as effective deterrents?

Fines and penalties provided for under section 12(1) are likely to be a deterrent if they were actually imposed by the courts. In practice this is not the case.

5. Should a regional approach be considered for some aspects of Local Authority enforcement of the Air Pollution Act, as is the case for other environment legislation, for example waste management?

- If so, what enforcement activities would best suit a regional approach?

The enforcement of regulations dealing with the marketing, sale and distribution of bituminous coal is a clear case in point where such arrangements are urgently required. These regulations require ongoing enforcement and the efforts of all local authorities would be much more efficient and targeted if a regional approach was adopted. The advent of online sales and mobile bulk storage of bituminous coal is a significant factor for the adaptation of environmental enforcement services that would be best served by a regional approach.

Similarly the negative impact on traffic in one area could be avoided, should another local authority introduce Low Emission Zones or congestion charging in their area.

6. Are there any other issues you wish to raise in relation to clean air policy and legislation?

One issue on which the Air Pollution Act 1987 is silent is in respect of air pollution from mobile and vehicular sources. Given that these are the primary sources of air pollution in our towns and cities, this needs to be addressed.

In practice this could include for the provision for measures to be taken by relevant authorities to reduce/mitigate traffic emissions such as introduction of Low Emission Zones, Congestion Charging, banning of certain types of fuel use\vehicles etc. and tackling of individual gross polluting vehicles.

Given this and the wide range of anomalies and inconsistencies in the Air Pollution Act 1987 that have become apparent over time, Dublin City Council would reiterate that a new Clean Air Act would be the best way forward.

Chapter 4 - sectoral issues and challenges addressing emissions from residential (4.2), transport (4.3), agriculture (4.4), energy (4.5) and industry (4.6);

Consultation Questions – Residential Sector:
(See Page: 33)

1. *Are there particular incentives that could be introduced to promote a quicker transition to clean, low carbon heating in the residential sector?*

A number of incentives could be considered:

- Introduction of dual electric night time \daytime meters. Currently domestic users must rent two meters. This places an extra avoidable cost on the use of night time rate electricity.
- Domestic users should only be required to pay a once off fee for their electric meters.
- The national electricity grid should allow domestic users use Solar PV as an input into the national grid.
- Expanded grants system for changing fuel types / boiler installation.
- Fiscal measures could be introduced to make bituminous coal less attractive than low smoke fuel and by extension other cleaner fuels more attractive than fossil fuels.

2. *Should complementary measures that could be introduced to support the national ban on bituminous ‘smoky’ coal by 2018? If yes, please elaborate?*

Currently, there is a legal prohibition on the marketing, sale, distribution and burning of bituminous coal in specified areas. There is not however any prohibition on the purchase of bituminous coal and this gap in the enforcement has proved to be problematic.

3. *Should gas be better promoted for home heating where it is available to houses on the gas grid? If so, how?*

Dublin City Council has no specific observations on this question.

4. *Are there adequate supplies of cleaner alternative fuels to supply the market and support the transition from ‘smoky’ coal for residential heating by 2018?*

Fuel suppliers have been preparing for this transition for a considerable period of time and in terms of air quality, climate change policy and the move towards a low carbon economy, it is an imperative to make this transition.

5. ***In relation to manufactured 'low smoke' solid fuels, should the;***
- (i) ***smoke emission rate of 10 g/hour be revised to be in line with the original standard introduced in 1990, and the current standards in Northern Ireland which have already been adopted for 2018 for biomass blended fuels in Ireland?***
 - (ii) ***smoke emission rate criteria apply to all manufactured solid fuels, rather than those just those containing coal?***

Dublin City Council supports the revision of the smoke emission rate and the elimination of this anomaly in the current legal standards. It also supports the introduction of smoke emission rate criteria applicable to all manufactured solid fuels.

6. ***How can better quality wood and biomass quality standards be promoted?***
Should consideration be given to setting mandatory fuel quality standards?

There is a relative lack of familiarity with wood and biomass fuels in Ireland compared to other fuels. This relates to a range of issues including public awareness about relative calorific output, value for money and relative output of pollutants associated with timber product fuels. There is also the matter of consumer protection as sub-standard fuels can damage or impair heating appliances. Mandatory standards that emphasise the interests of the consumer should be considered.

7. ***Should consideration be given to bringing forward the date from 2022 for the introduction of Ecodesign standards for residential stoves?***

Are there other ways to increase the uptake of E Code sign standards for stoves ahead of the 2022 mandatory deadline?

Should Ecodesign standards be required now where biomass combustion is chosen as a renewable energy source to meet Building Regulations requirements?

Action in this area such as guidance / legislation is urgently required. The proliferation of wood burning stoves in new residential extensions can be somewhat problematic, as highlighted within the consultation document as there are no mandatory emissions standards at present and no national accreditation required to install solid fuel appliances. As mentioned in the document the corresponding flues from these stoves can impact negatively on adjoining properties if the stove is installed in a ground floor extension and the chimney or flue is adjacent to upper floors of the neighbouring properties.

8. Are there specific targeted retrofit schemes which could be introduced to promote cleaner fuel and cleaner air and address energy poverty, improve energy efficiency?

The pilot retrofit schemes being operated by various local authorities should be scaled up to full implementation in conjunction with home insulations schemes.

9. Should consideration be given to requiring all installers of solid fuel appliances to meet a national accreditation or standard (similar to requirements for gas installation etc.)?

While the move away from solid fuel use must be accentuated, the installation of solid fuel appliance by a qualified accredited individual should be mandatory.

10. Are there any other issues you wish to raise in relation to air pollution from the residential sector?

- Enhanced insulation standards should be required from all 'new builds'.
- The number of solid fuel appliances (i.e. fireplace / stove) in a dwelling should be limited to one.

Consultation questions – Transport

(See Page 41)

1. Could a congestion charge promote a shift to public transport in certain urban areas and deliver a range of interlinked benefits including improving air quality, climate policy and sustainable transport by encouraging greater public transport use or use other low impact modes like cycling or walking?

Congestion charging or Low Emission Zones will have limited benefit if there are no corresponding viable alternatives, such as an increased support in the provision of an affordable and efficient public transport system.

These initiatives all involve the drive towards reduction or relocation of source emitters. As already mentioned above in relation to a "clear vision for air", the policy should be driven by protection and prevention, through an avoid\reduce ethos.

The predictions from the Auto Oil II project carried out by the EU in the early 2000s indicated that into the future technology alone through the use of emission control technology will not suffice to overcome air pollution emissions due to the growth in number of vehicles on the road. Therefore concerted effort should be made to encourage the up take through fiscal measures of hybrid\electric vehicles especially in the public transport fleet.

2. Should consideration be given to the introduction of Low Emission Zones in urban areas?

Without other complementary measures, this will only result in the displacement of source emitters if alternative adequate and cleaner public transport facilities are not provided; - see also above

3. Should consideration be given to incorporating air quality considerations into vehicle taxation?

If so should these considerations be addressed to VRT, motor tax or fuel taxes or a combination of all three?

Vehicle taxation should be considered with an emphasis on encouraging the uptake of hybrid\electric vehicles. It would also be beneficial if such taxes could be ring fenced for funding environmental protection measures. Otherwise it may just be perceived as one more form of general taxation.

A fuel tax has the benefit of being linked to consumption i.e. “the more you use - the more you pay”. This could be used to encourage conservation\reduction in fuel\distance travelled and promote cleaner fuels.

4. How can the issue of DPF(Diesel Particulate Filter)removal best be tackled?

- ***Should consideration be given to creating a specific offence for removal of a DPFs and/or advertisement of its removal?
Could the NCT be expanded to include DPF examination?***

A new Clean Air Act could make provision to allow for vehicle emission inspections anytime \anywhere including during NCT.

While diesel engines are more energy efficient than petrol engines and have lower CO2 emissions, they do have an adverse effect on local air quality as a result of their higher particulate and NOX emissions. This is particularly significant in built-up city centre locations, where the fumes can be concentrated from traffic congestion and lower air circulation.

Dublin City Council would recommend a gradual shift to electric vehicles as these are best suited to city centre environments, as they have zero tailpipe emissions.

- 5. In the wake of the VW emissions scandal, how can 'in use' vehicle emissions be better regulated?**
- **Could the NCT emissions testing have a role in periodic assessment of air pollution emissions, to inform better regulation of 'in use' vehicle emissions?**
 - **Is there data contained in vehicle On Board Diagnostics (OBD) systems that could be useful in this regard?**
 - **Should a programme of national emission testing be conducted in Ireland, as has been done in other countries, to assess real driving emissions from vehicles on the roads?**

All of these suggestions are worthy of deliberation but the feasibility of tackling them on a standalone basis rather than an EU-wide basis merits further consideration.

- 6. How can a greater consideration of emissions be incorporated into the procurement of new public transport vehicles in line with the EU Clean Vehicles Directive?**

There are examples of good practice in other jurisdictions that merit examination which require/encourage public transport providers and service fleets to procure 'cleaner' vehicles, ideally electric or hybrid vehicles

- 7. Are there steps that could be taken to reduce emissions from ports given the anticipated increase in shipping including, for example, cruise traffic?**
- **Should consideration be given to introducing an Emission Control Area under MARPOL in the seas between Ireland and the UK?**
 - **Are there specific steps or incentives that can be taken to promote the uptake of shore side electricity to reduce air pollution from shipping operations whilst in port?**
 - **Should consideration be given to prohibiting the discharging to seas in Ireland of contaminated 'wash' water from ships air abatement systems?**

- 8. Are there additional air pollution sources or impacts from aviation or rail that should be considered?**

Dublin City Council has no specific observations on this question.

Consultation questions - Agriculture Sector
(See Page 49)

Dublin City Council has no specific observations on this Chapter

Consultation Question - Energy Sector
(See Page 52)

- 1. What are the best means of regulating the air pollutant emissions from relevant biomass plant that will be supported by the Renewable Heating Initiative (RHI) scheme in Ireland?**
- 2. Is guidance needed at a local level to ensure that biomass installations related to the RHI scheme or otherwise do not cause air quality issues particularly in relation to those which are exempted from planning legislation?**

While the use of biomass makes a positive contribution towards meeting Ireland's renewable energy (heat) target and reducing greenhouse emissions, it does however, have a negative impact on local air quality in an urban environment through increased emissions of smoke, including possibly SOX, NOX, particulates and VOCs.

Dublin City Council would recommend that, before biomass is considered, opportunities should be explored for the re-use of heat that is currently a wasted by-product of industrial activities such as electricity generation, data centres and, soon, the waste heat from the waste-to-energy plant. This waste heat could be re-used through the development of a District Heating network, with near-zero additional emissions. Currently this heat is simply discharged into Dublin Bay and the amount of waste heat is very large - estimated as enough to heat approximately 40% of all Dublin buildings

- 3. How could transparency regarding large emissions sources regulated under the IED be improved? Should data from continuous emissions monitoring systems be made more readily available online?**
- 4. Are there any other issues you wish to raise in relation to energy policy and clean air?**

Energy use and clean air are intrinsically linked - which is not always recognised in the development of government policy. We've had the policy that all 'government policy' should be environmentally proofed. But has it really happened and have concerns raised really been listened to by so-called non-environmentally related Government Departments – i.e. Dept. of Finance.

Consultation questions - Industry and Other Sectors
(See Page 56)

- 1. *Is there a need for review and strengthening of local authority and EPA powers in relation to dealing with nuisance, and in particular odour nuisance?***

There is a need for a fundamental review of the powers available to deal with nuisance, particularly the issue of “good defences ” needs to be examined.

There is also a need to back up legal provisions with comprehensive guidance on what constitutes “best practicable means”.

A case in point is construction and demolition activities, where it would be useful to something similar to ‘The Control of Dust and Emissions During Construction and Demolition – Supplementary Planning Guidance’ a document produced by the Mayor of London in July 2014.

- 2. *How can the enforcement of the prohibition on illegal waste burning be improved?***

The enforcement of these provisions are resource intensive.

- a. *Is there sufficient awareness of the impact it causes?***

A public awareness campaign on the impacts of uncontrolled burning waste in general and specifically the health effects on those exposed to such emissions should be considered

- b. *Is the existing legislation sufficient to allow enforcement officers to take action?***

The Waste Management (Prohibition of Waste Disposal by burning) regulations 2009 provides a good basis for enforcement .

- 3. *A ‘gap’ exists between proposed new pieces of legislation, namely the MCP and the Eco Design Directive(EDD). How can the gap that exists between the EDD and Medium Combustion Plants Directive (MCPD) best be dealt with for appliances/plant that come into this range in Ireland (for example through a future Renewable Heat Incentive (RHI) scheme)?***

Dublin City Council has no specific observations on this question.

- 4. *Are there other emerging issues related to industrial or other sources that require action?***

Dublin City Council has no specific observations on this question.

Chapter 5 - the air quality monitoring, modelling and forecasting arrangements in Ireland;

Consultation Questions –understanding the Air Quality challenge (See Page 63)

1. ***How can pollutant emissions data be better used in informing actions from local to national levels?***

Something similar to an Environmental Statistics Bureau needs to be formed where all Irish environmental data is 'harvested' stored, analysed and released to the public.

2. ***How can data from the various observation activities carried out in Ireland be better used or developed to enhance responses to air quality and climate challenges?***

Making air quality data available to the public in an easily understandable, real-time manner must be a priority action in the Clean Air Strategy.

3. ***Beyond the scope of the CAFÉ Directive monitoring requirements (see section 5.3), are there other air quality monitoring activities that Ireland should be undertaking?***

Localised meteorological monitoring stations should be co-located with air quality monitoring sites.

More medium term monitoring for poor air quality at 'hot spots' should be encouraged outside of the CAFÉ Directive requirements.

4. ***How could an ammonia monitoring network for Ireland best be developed? Are there synergies to be gained by alignment with monitoring in other environmental areas e.g. under the Water Framework Directive/Nitrates Directive?***

Dublin City Council has no specific observations on this question.

5. ***How can the monitoring capacity that exists in universities be best harnessed to inform knowledge of air pollution sources?***

Dublin City Council, as one of the partners in the Environmental Sustainability and Health Institute (ESHI), has a track record in working with universities on air quality research. This experience would suggest that the key to maximising the monitoring capacity of universities is to collaborate with them on research topics that have a practical and immediate application.

6. ***Programmes such as Copernicus and MACC are providing real-time high resolution data on a range of air quality parameters through its satellite and remote sensing activities. How can Ireland make better use of this data and how should it be used?***

Dublin City Council has no specific observations on this question.

7. How could Unmanned Aerial Vehicles such as drones be used to improve air quality management in Ireland?

Dublin City Council has no specific observations on this question.

8. *Are there examples of other types of technology that could be used for air quality purposes?*

Dublin City Council continues to keep utilisation of low cost sensors under active review and has facilitated requests by developers for the co-location of such sensors at Dublin City Council air quality monitoring sites for calibration purposes.

In practice, there are still challenges to be overcome around the technology.

9. *Are there other issues you wish to raise in relation the monitoring, modelling and forecasting of air quality?*

Dublin City Council is actively collaborating with the Environmental Protection Agency on the expansion of the national air quality monitoring network. In the context of the EPA expansion programme it is recommended that the resources required for expanding the national network should come from central funding.

Chapter 6 - the current state of air quality research in Ireland;

Consultation questions – Research

(See Page 65)

1. What are the important current and emerging air quality issues in Ireland that require research?

Attitudinal studies in relation to individual behaviours that increase air pollution and the action required to encourage life style changes in order to substantially reduce CO₂ and air polluting emissions.

2. Are there air quality areas and topics that have not been previously investigated that require additional research? If so please provide some examples of topics?

- Study of the variation in air quality at different height within an urban setting.
- Creation of new emission factors for biomass fuels
- Research into the potential impact on air quality by incentivising petrol use over diesel use.
- Research into the local air quality impact of incentivising large private fleets such as 'Taxis' to use electric\hybrid vehicles.

3. How can the national research capacity that exists in Universities on air quality issues be best used to achieve the clean air vision?

EPA Research Programme funding has been crucial in developing a dynamic air quality research community in Ireland. Explicitly linking future research calls to meeting Clean Air Strategy goals would help to focus the work of these research teams.

4. Do you have any other issues you wish to raise in relation air quality research?

While valuable air quality research work has been carried out in Ireland, there is a gap in terms of mainstreaming and sustaining the outputs from this research. Examples of this would include recent EPA funded projects on air quality prediction models and emission inventories, where the activity ceases once the research project is completed.

Chapter 7 -the issues of communication and awareness in relation to air quality;

**Consultation Questions – Communication and Awareness
(See Page 67)**

- 1. How can the general public best be made more aware of the health impacts of air pollution?**
- 2. Is enough information readily available to the general public about air quality where they live and work?**
- 3. National awareness campaigns have been undertaken on issues like Waste (Race against waste) climate change (change.ie) and energy efficiency (the Power of One campaign). What issues might a national clean air awareness campaign encompass and how could its impact be measured?**
 - Are there particular issues that would benefit from an awareness raising campaign, for example, what choices can the individual make that reduce air pollution in a person's area?**
 - Should a clean air theme be developed for the Green Schools programme?**

There is no “one size fits all” solution to this issue and there is a need to tailor specific messages and means of communicating that message to specific demographic groups.

The work that has already been done by such groups as the Asthma Society of Ireland, whereby specific health messages have been developed for specific target audiences is a solid starting point to begin.

Similarly the incorporation of clean air actions in the Tidy Towns competition in recent years is a welcome innovation that taps into the individual and community sense of pride of place.

Chapter 8- timeline for development of the National Clean Air Strategy

Consultation questions – Governance and Clean Air Strategy (See Page 69)

1. *Are there particular metrics or benchmarks should be considered in tracking the progress of a Clean Air Strategy?*

The expansion of the national air quality monitoring network should be used as an opportunity to benchmark the baseline air quality in Ireland. Then the network should be utilised to track progress towards achieving WHO air quality guideline standards rather than compliance with EU limit values.

2. *Are there any other issues you wish to raise in relation to development of a national clean air strategy?*

As stated earlier, a protection approach to ensure those areas that currently have good air quality needs to be adopted. It must also be recognised that poor air quality in smaller population centres and local sources of pollution must be addressed.

Incentivising and empowering individuals and communities to make “cleaner air” choices must be developed, using a mix of legal and fiscal instruments.

An all-island approach to protecting air quality must be adopted.

In conclusion Dublin City Council notes the commitment to have active engagement with stakeholders during 2017 in the lead up to producing the Clean Air Strategy. This engagement is required not only in the production, but ultimately in the delivery of this strategy. The Department must give careful consideration as to how this engagement can be developed in a sustainable manner to deliver on this important national strategy.