

CONSULTATION
Response Document



Consultation on the Clean Air Strategy for Ireland
(Department of Environment, Climate and Communications)
April 2022

Introduction to CIEEM The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and

environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation. CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 314 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by our Ireland Policy Group. We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Please find below the responses to the suggested questions:

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

CIEEM does agree with the five strategic priorities.

Under the third Key Action “Increased evidence base” CIEEM would like to see included: support for the National Ecosystem Monitoring Network. This will ensure essential monitoring of air quality and its effects across sensitive Irish ecosystems and comply with the National Emissions Ceilings Directive.

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

CIEEM would like the plan to acknowledge the existing issue of standards of air quality environmental/ecological assessments. Often these assessments can be carried out inadequately and the initial reviewer may not have the expertise to adequately gauge this. CIEEM would like to see a commitment to increasing the level of review of these assessments and introduce a system where they could be randomly selected for detailed external review.

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

CIEEM recognises the vision of this document to increase collaboration to ensure its implementation, with actions such as the establishment of the Clean Air Strategic Implementation Group.

- We would like to reiterate the need for an integrated approach being needed to deal with nitrogen deposition across Irish habitats (Largely as a result of ammonia emissions, but also NOx). Different bodies are involved with different levels of assessment under different circumstances, including EPA, NPWS and local councils. An integrated approach should be developed for uniform application across all sources and ideally should have applications reviewed by a single body or at least with an added external review of assessments.
- CIEEM would also like to highlight that although the EPA has developed guidance to assess impacts from intensive pig and poultry farms this is only used on those who are licensed under the Industrial Emissions Directive. These large scale enterprises are only a small proportion of total farms and those that are slightly under this threshold, are not captured despite the fact that their impact could still be significant. An integrated approach needs to be developed to assess and regulate impacts from **all** sources of nitrogen.
- CIEEM would like consideration to be given to the development of tools to support decision making relevant to impacts from nitrogen deposition. The Netherlands have developed the AERIUS tool for this specific purpose. This is currently being adapted for the UK and which we think should be considered for use in Ireland.

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

CIEEM would highlight the need for urgent action on the issue of nitrogen deposition across the Natura 2000 network. Recent work has highlighted that a number of sensitive sites already exceed their site specific thresholds for impacts, and nitrogen deposition is contributing to their inability to meet conservation objectives. Research highlights that reducing emissions is not always sufficient to reduce concentrations, deposition and impacts. Therefore CIEEM would recommend that a more targeted approach be developed and applied. CIEEM would like to see site specific nitrogen management plans developed for the Natura 2000 network.

Other recommendations include:

- Development of a long term targeted national ammonia monitoring network. This is essential to protect habitats and reduce ammonia emissions into the future.
- Research into the links between nitrogen deposition and climate change. It has been shown that dry deposition of ammonia increases N₂O emissions and deposition of total nitrogen affects the ability of peatlands to act as carbon sinks. However these effects have yet to be quantified for Ireland, especially where large portions of midlands bogs are in areas with known high ammonia emissions.

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

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

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

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

- Delivery of Clean Air Strategy will rely on the knowledge, skills and resources of statutory agencies and local planning authorities alike to address these issues. However, such organisations may not have the resources to successfully implement

new policies and measures, particularly within a consistent manner. For example, many local authorities do not employ an ecologist who would be able to advise on biodiversity matters, whilst planning officers are in need of more training and other support in assessing the air pollution impacts of, for example, agricultural and other rural developments. Air quality is increasingly recognised as an impact pathway that requires assessment by ecologists and air quality specialists in conjunction. We would like to see commitment to employ and train appropriate Local Authority staff to ensure this strategy is successfully implemented.

- We would recommend a section in the transport section be included that addresses the issue of increased ammonia emission from traffic and its effect on biodiversity. Reduction in NO_x, by the addition of AdBlue in diesel cars, are achieved only through its conversion to ammonia. Ammonia is shown to have a greater effect on biodiversity. Although the effects are yet to be quantified in Ireland there is likely to be increased impacts along roadsides. Direct exposure to ammonia increases pH, but when it's deposited it breaks down and hydrogen ions cause acidification. It can also impact species through direct toxicity.
- We would recommend the inclusion of a bibliography in the text. This should be included for review of sources.