

Draft National Air Pollution Control Programme Consultation
Air Quality Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford, Y35 AP90
By email to: airquality@decc.gov.ie

IrBEA – Irish Bioenergy Association
DCU Alpha Business Unit ICA104
Old Finglas Road, Glasnevin
Dublin 11, D11KXN4
noelgavigan@irbea.org

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Submission on Draft National Air Pollution Control Programme

Dear Sir / Madam,

On behalf of the Irish Bioenergy Association please find below our response to your consultation on the National Air Pollution Control Programme.

We note the comprehensive assessment of relevant cross policy documents such as the NECP, NREAP, RDP, NAF, CAS, Food Wise 2025 etc..etc.. and appreciate that within and between these policies compromises will need to be considered to ensure the best possible path forward.

Principally our focus in our response is with recognition to the measures required to adapt or economy to best meet the challenge of the climate emergency - to that end we may be proposing certain compromises that will ensure Ireland is able to decarbonize its economy while having a minimal impact on localized air quality and the environment.

Yours Sincerely,

Noel Gavigan

Importance of Wood Fuels in meeting climate targets

The Irish Bioenergy Association has for the past 20 years been involved in the regulation and promotion of low carbon fuels for the heating sector such as firewood wood pellets and woodchip. These fuels are vital for Ireland's transition to a low carbon economy, while recognizing that they must be incorporated in a manner that does not negatively impact air quality.

Our industry across Europe over the past 30 years has invested heavily in research into proper combustion techniques that will ensure minimal and negligible emissions of particulates and other harmful substances. While Ireland has been slow to adapt to using wood fuels, we are now in a position as a late adopter to capitalize on using the most advanced technology for combustion.

Our response here relates solely to the use of renewable solid fuels.

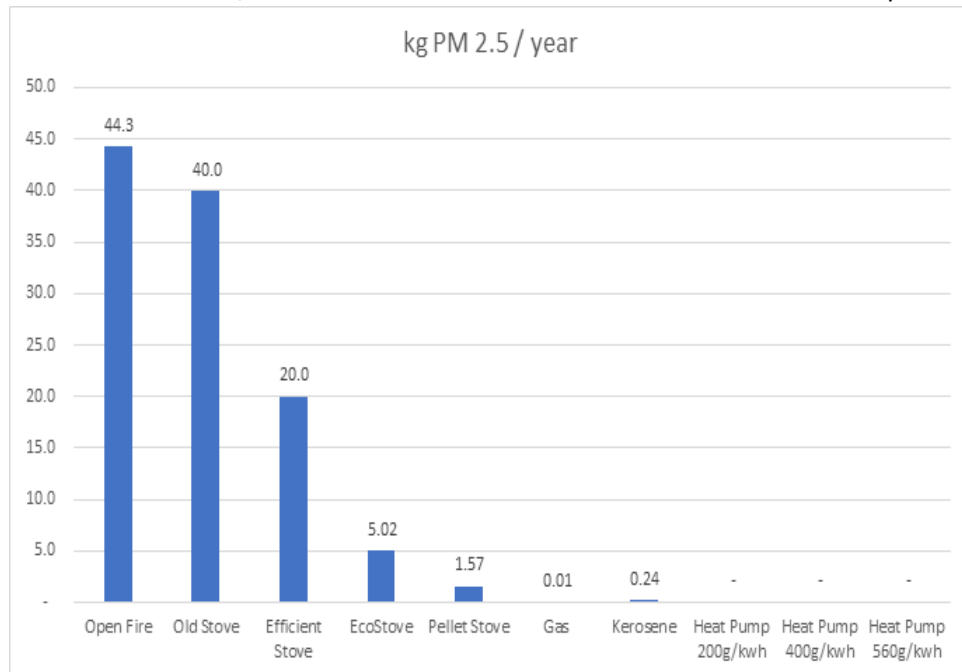
While the draft NAPCP Recognizes proposals to adapt large numbers of heat pumps for Ireland's housing, we would note that heat pumps will only be able to partially decarbonize our economy. The 10 year targets to retrofit 400,000 existing houses will require major retrofits of 40,000 houses per year every year for the next decade. Given that Ireland is currently struggling to build 20,000 houses per year it must be noted that the additional labor required to retrofit these houses does not currently exist in Ireland. It is recognized that decarbonization of heat will need to include woodfuel systems in domestic houses, particularly in larger and older houses and those in rural areas.

Less than half of Irelands heating requirements are at temperatures suitable for heat pumps. Any heat used above 60°C can only be decarbonized using wood fuels, therefore their inclusion in any policy going forward needs to be recognized. Our industry is working with the EPA and SEAI to ensure that installed industrial and commercial boilers do not have a negative impact on air quality.

The use of properly designed appliances for wood fuels has a dramatic effect on emissions of particulates as detailed in Figure 1 below. In addition, the reduction of CO2 emissions (Figure 2) from using wood fuels over fossil fuels or heat pumps must be taken into account in any future policy measures.

Figure 1: Annual Particulate Emissions from heating a standard home

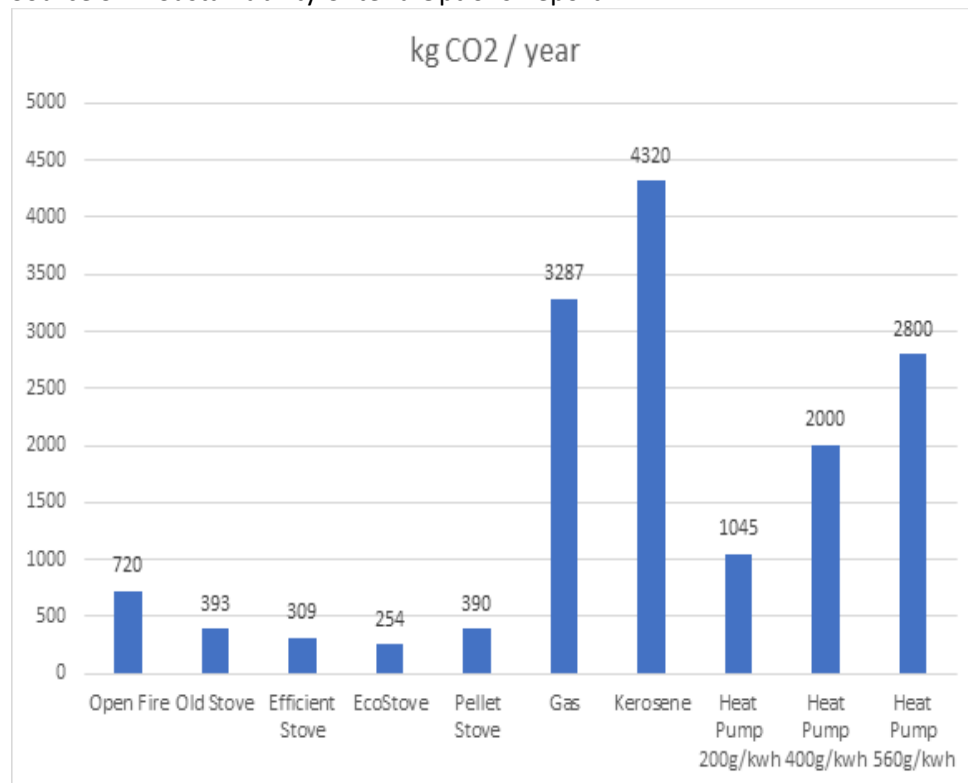
Data Source: EMEP/EEA Guide Book small Combustion Emission Factors updated July 2017



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Figure 2: Annual CO2 emissions from heating a standard home

Source SEAI Sustainability Criteria Options Report



Solid Fuels impact

We note in the draft NAPCP the recognition that solid fuels have traditionally been a large source of particulate matter. In the report it is noted that from 1990 to 2018 air quality control measures have resulted in reduction of particulate matter from residential heating by 73%, it is further noted that in the same period of time that all other sources have reduced their emissions by approximately 30%. To date firewood is not regulated and the market contains large quantities of wet firewood. We have called for regulation of firewood to ensure that only dry firewood which will burn clean is allowed on the market. We envisage significant reductions of emissions if firewood is regulated similar to how coal was regulated.

We look forward to the proposed full consultation on regulation of solid fuels in the near future in which we will respond comprehensively.

Our Proposals to add to Draft NAPCP

The draft NAPCP includes additional measures in appendix, we note that the measures listed do not include some measures which have a significant impact in reducing particulate matter and other harmful emissions to air from solid fuel combustion. We propose that additional measures will include the following:

1. Regulation of wood fuels in Ireland to meet European standards.
2. Regulation of firewood ensuring that no firewood may be placed for sale where the moisture content is above 20%.
3. Regulations ensuring that only EcoDesign appliances may be offered for sale in Ireland.

Further to including the above measures we also propose that the NAPCP includes assessment of the above measures and includes assessment of the positive impact they will have on air emissions as part of its overall projection.

Other Comments

Specifically, we note section 4.2.2.3 lists wood as a major source of harmful emissions. We propose that this be altered to describe wet or unseasoned wood as being the major source of harmful emissions. We ask that the document recognize the positive aspects of properly dried wood fuel on air emissions.

We note that fossil gas fuel is described in the document as a clean fuel. While in terms of localized air emissions fossil gas may be considered “clean”, we propose that the document recognizes that fossil gas is not clean in the global context neither in terms of its point of extraction nor in terms of its overall impact on the climate. We object to the document proposing that fossil gas be considered as an ongoing or future solution to air emissions.