

Cynulliad Cenedlaethol Cymru  
Y Pwyllgor Newid Hinsawdd,  
Amgylchedd a Materion Gwledig  
Ansawdd Aer  
NHAMC (5) AA02  
Ymateb gan Bwrdd Iechyd Prifysgol  
Betsi Cadwaladr

National Assembly for Wales  
Climate Change, Environment and  
Rural Affairs Committee  
Air Quality  
CCERA(5) AQ02  
Evidence from Betsi Cadwaladr  
University Healthboard

---

What regulatory gaps or issues will need to be addressed after the UK leaves the EU?

How should these be addressed and what will be the main challenges?

Gaps in regulation occurring due to the UK leaving the EU should be identified proactively and, in collaboration with those bodies to whom the regulations most closely apply, efforts should be made to ensure that subsequent regulations advance the health of the population and promote environmental sustainability.

Are the Welsh Government's proposals for a Clean Air Act appropriate?

How could they be improved?

What can be learned from legislative approaches elsewhere?

The Clean Air Act could be enhanced by the provision of support for those individuals who would otherwise be put at increased risk by measures it legislates for. Such as (i) subsidising any increased cost in solid fuels for homes in which this is the sole means of heating and where it would otherwise place a detrimental burden on the occupants, and (ii) providing suitable alternative means of transport for those who would be unable to adapt to low emissions zones.

What are your views on the regulatory proposals in relation to the Local Air Quality Management regime?

What are the main challenges in relation the proposed approach?

Increased public engagement will be an asset to the future LAQM regime, with benefits encompassing (i) enhanced public understanding of air quality and the rationale for improving it, (ii) awareness of changes that can be implemented at both an individual and collective level to facilitate air quality improvement, and (iii) the more timely identification of potential air pollutant sources.

The proactive identification of potential sources is an important aspect of control. However, out with of local knowledge and the public reporting of areas of concern, there is a need, as noted in the text of the document, for technical support in the identification of areas of concern. The accessibility of this support

should be a key consideration. In association with this, dependent on the number of monitors available, consideration should be given to the need for different timeframes for the review of monitor siting. Such that if a monitor does not detect a deterioration in air quality at a chosen location, it could be considered for earlier reassignment. While at other sites, where longer term monitoring and/or a response to remediative action is required, reassignment could be delayed.

Furthermore, with the focus on “where members of the public are regularly present and where there is exposure to the pollutant in question over the timescale for which the air quality objective is defined”, consideration should be given for how this is quantified in areas that experience seasonal population fluctuations (e.g. holiday communities).

What are your views on the regulatory proposals relating to domestic combustion (including fireworks/bonfires), road vehicle idling and Clean Air Zones/Low Emission Zones?

Assistance should be provided to individuals who do not have the financial resources to comply with any new regulations (e.g. those homes where solid fuel burning is the sole source of heat). Not doing so could place individuals at increased risk of the effects of cold weather and the resultant health impacts of this.

The further assessment of the contribution of fireworks and bonfires to PM<sub>2.5</sub> emissions should feed into the consideration of whether the monitoring of PM<sub>2.5</sub> by local authorities should be mandatory. In the event of regulatory control of bonfires and fireworks consideration should be given to the public health and wider social impact of (i) firework use transferring away from domestic settings to avoid identification and control; and (ii) the need for suitable waste collection/clearance of material that would have otherwise been burnt. The establishment of Clean Air Zones/Low Emission Zones needs to take into account those individuals who have no other suitable means of transport, such as (i) those who live in rural areas not served by public transport and (ii) those who require vehicular transport close to their final destination due to limited mobility.

What are the main challenges in introducing a legislative framework for air quality as set out in the consultation document?

Providing a robust means for ensuring improved air quality for current and future generations while at the same time ensuring we support those individuals who may be put at risk by this transition.