

Cynulliad Cenedlaethol Cymru  
Y Pwyllgor Newid Hinsawdd,  
Amgylchedd a Materion Gwledig  
Ansawdd Aer  
NHAMC (5) AA09  
Ymateb gan Plantlife Cymru

National Assembly for Wales  
Climate Change, Environment and  
Rural Affairs Committee  
Air Quality  
CCERA(5) AQ09  
Evidence from Plantlife Cymru

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## Introduction to Plantlife

Plantlife is the British conservation charity that works nationally and internationally to save threatened wild flowers, plants and fungi, thanks to our 11,000 members and supporters. We own nearly 4,500 acres of nature reserve across England, Scotland and Wales where you can find over 80% of the UK's wild flowers.

Plantlife Cymru, as the operating arm of Plantlife in Wales, has been active in taking action and speaking out for wild plants, fungi, lichens and bryophytes for over 20 years. We have been instrumental in the recovery of Fen Orchids at Kenfig to the improved populations on Tree Lungwort in our Atlantic Woodlands. Increasingly our work involves people in creating a greater understanding of how plant life underpins all biodiversity in Wales.

One of Plantlife's main objectives is to reduce the impact of air pollution on wild plants and fungi through atmospheric nitrogen deposition. Air pollution is now one of the primary causes of wildlife loss and environmental degradation in Wales. Unprecedented concentrations of nitrogen have built up in the atmosphere, due to ammonia (NH<sub>3</sub>) and nitrogen oxide (NO<sub>x</sub>) emissions from intensive farming practices and fossil fuels.

Excess nitrogen in the atmosphere is deposited into nature, disrupting ecosystems and making it impossible for many species to survive; more than two-thirds of wild flowers, as well as many lichens and other fungi, cannot tolerate high nitrogen levels.

In Wales, 89% of sensitive wildlife habitat is suffering from excessive nitrogen levels, from Powys and Pembrokeshire to the peaks of Snowdonia. While NO<sub>x</sub> emissions have been cut significantly and are a continued focus of air quality strategies, ammonia has flown under the radar for too long. Despite its impacts on public health and wildlife, up to 95% of ammonia emissions – from farm animals and fertilisers – are unregulated in Wales.

Our 2018 report calling for urgent action on ammonia emissions and wildlife in Wales, along with further information about our work in this area, is available here: <http://www.plantlife.org.uk/uk/our-work/policy/nitrogen>.

We welcome the opportunity to submit comments to CCERA's Inquiry into Air Quality and we would be pleased to discuss the issues raised with the Committee in more detail as appropriate.

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?

- 1.1. EU Directives and other European policy and legislation have provided the drivers for monitoring, reporting and enforcement action on air pollution and its impacts on sensitive wildlife sites. For example, the EU Habitats Directive requires Member States to assess and report on the condition of Special Areas of Conservation (SACs), including levels of atmospheric nitrogen deposition. The protection afforded to SACs by the Habitats Directive has helped protect many of Wales's most important wildlife sites and has provided a framework for the Welsh Government, its agencies and local planning authorities to reject proposals for damaging development or to take enforcement action where necessary.
- 1.2. The Welsh Government must take the opportunity of its Clean Air Plan and a Clean Air Act to maintain **and strengthen** domestic legal requirements to reduce air pollution and to protect sensitive wildlife habitats from further damage. This should include mechanisms for monitoring, reporting, spatial planning and enforcement, along with a requirement to provide adequate funding for these to be delivered by national and local government.
- 1.3. Targets agreed under the EU National Emissions Ceiling Directive for reductions by 2030 go above and beyond the 2020 targets required by the UK's international commitments outside the EU. Ambitious statutory targets for 2030 and beyond must be set by the Welsh Government in the Clean Air Act, including for ammonia emissions.

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?

- 1.4. Plantlife supports many of the proposals for a Clean Air Act. However, the Act should also tackle the problem of ammonia emissions from agriculture, which are damaging to public health and the natural environment.

- 1.5. Of the trends in air pollutant emissions in the figure on page 12 of the consultation, ammonia stands out as the exception. Almost no progress has been made in reducing emissions since 1990 and recent years show a steady increase in emissions. The NECD target for 2020 will be missed across the UK and the 2030 target will also be missed without regulatory action.
- 1.6. In order to reduce ammonia emissions effectively, the Clean Air Act for Wales should introduce new targets and powers to require action by the agricultural sector and other sources. Voluntary measures by the farming industry have been ineffective and an integrated regulatory approach is required. Only the most intensive pig and poultry farms require an environmental permit, accounting for an estimated 5% of Welsh ammonia emissions. The remaining 95% of ammonia emissions are currently unregulated.
- 1.7. Medium and long term targets should be set for all major air pollutants, including ammonia. The WHO Guidelines standards for air quality do not include ammonia as it is not appropriate to measure ambient levels of this pollutant. However, targets should be set for annual emissions and for reduction of the damaging impacts of concentrated emissions on sensitive species and habitats.
- 1.8. New regulation to require action to reduce ammonia emissions should include:
  - a reduction in the threshold for EIA and environmental permits for intensive pig and poultry units;
  - a requirement for environmental permitting of beef and dairy herds;
  - requirements for more efficient management, storage and application of manure, slurry and other fertilisers;
  - a responsibility for planning authorities to look at the cumulative effects of new applications on local air quality.
- 1.9. Legislation and regulation of agricultural activities should be closely integrated with regulatory measures to cut water pollution and greenhouse gas emissions. All agricultural regulation should form part of a package of advice, support and incentives for farm businesses in

the new land management scheme to ensure a swift transition to sustainable farming across Wales.

- 1.10. Legislative approaches to ammonia emissions reduction have been implemented in several countries, including Denmark and the Netherlands. Plantlife supports the commitments in Defra's Clean Air Strategy 2019 relating to ammonia emissions from agriculture and other sources.

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?

- 1.11. As part of LAQM monitoring and assessment, it is important to measure all damaging pollutants and all impacts. The LAQM should not only focus on the public health risks from air pollution but also the risks to wild species, natural ecosystems and habitats which are vulnerable to damaging atmospheric nitrogen deposition, often from point sources of NO<sub>x</sub> and ammonia emissions.
- 1.12. Air quality is a rural and urban issue, affecting people and wildlife, and the proposed integrated approach to local air quality management must reflect that. There are significant rural 'hotspots' across Wales where, for example, a cluster of intensive livestock units is developed close to areas of sensitive wildlife habitat. The integrated approach must include a suite of actions to reduce agricultural ammonia emissions and the impact of nitrogen deposition (from ammonia and NO<sub>x</sub>) on the natural environment. For example, this will enable local planning authorities to plan strategically for better air quality and to assess local development plans and individual planning applications within an integrated and comprehensive framework.

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?

1.13. No comments

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

1.14. No comments