

Fine particulate matter air quality targets

Q1. Question 1a: To what extent do you agree with the level of ambition proposed for the Annual Mean Concentration Target (AMCT)?

Agree

Q2. Question 1b: Please explain your answer

The Stove Industry Association (SIA) welcomes the opportunity to respond to the Welsh Government consultation on proposed fine particulate matter (PM2.5) air quality targets.

The SIA recognises the importance of improving air quality and supports proportionate, evidence-based measures that reduce public exposure to PM2.5 while maintaining safe, resilient and affordable heating for households, particularly in rural and off-grid communities.

We support the use of a twin-track framework (Annual Mean Concentration Target and Population Exposure Reduction Target) and emphasise the importance of implementation approaches that reflect the evidence base, including the significant contribution of transboundary and natural sources and the need for targeted domestic interventions rather than blanket restrictions.

The SIA agrees with the proposed Annual Mean Concentration Target of 10 µg/m³ by 31 December 2035 provided it is implemented through proportionate and evidence-led measures.

The consultation evidence indicates that a substantial proportion of PM2.5 concentrations in Wales originates outside Welsh control, with modelling suggesting approximately 22% attributable to emissions within Wales and 78% from transboundary or natural sources.

The delivery strategy should therefore prioritise interventions that are demonstrably effective within Welsh competence while recognising limits to domestic influence.

The consultation also identifies domestic combustion as a contributor to population-weighted exposure within Wales. Accordingly, measures targeting the highest-emitting fuels, legacy appliances and poor operating practices are likely to deliver meaningful reductions.

The consultation's illustrative measures — such as restricting domestic coal use, regulating wet wood, improving appliance certification and encouraging upgrades from open fires — represent proportionate examples of this type of targeted approach.

The SIA therefore supports the ambition of the target, subject to implementation focusing on effective interventions rather than undifferentiated restrictions that could undermine household heating resilience without delivering commensurate air quality benefits.

Q3. Question 2a: To what extent do you agree with the level of ambition proposed for the Population Exposure Reduction Target (PERT)?

Agree

Q4. Question 2b: Please explain your answer.

The SIA supports the proposed 25% reduction in population exposure by 31 December 2035 relative to the 2017-2019 baseline.

A population exposure metric is appropriate because it ensures improvements occur across communities rather than focusing only on a small number of monitoring hotspots. This aligns with the rationale for

Q4. Question 2b: Please explain your answer.

adopting a twin-track target framework combining concentration and exposure metrics.

We also support the proposal that exposure assessment should be based primarily on representative background monitoring locations rather than near-source sites, as this better reflects real population exposure.

However, achieving this target will require a balanced approach that recognises both domestic and external influences on PM2.5 levels. As the consultation notes significant transboundary contributions, delivery of the exposure reduction target will depend on Welsh measures alongside wider UK and international actions.

Q5. Question 3a: To what extent do you agree with the proposed arrangements for assessing PM2.5 levels and achievement of the targets?

Agree

Q6. Question 3b: Please explain your answer.

The SIA supports the proposed monitoring-based compliance framework.

We welcome the use of recognised reference measurement standards (including BS EN 12341:2023 or demonstrably equivalent methods) as this provides consistency and confidence where policy decisions may influence household heating choices.

We also support:

- Separate assessment approaches for AMCT and PERT
- Multi-year averaging for exposure measurement
- Expansion of the monitoring network

The consultation notes the current network of 11 monitoring stations and the intention to increase coverage to meet minimum monitoring criteria from 2033. Expanding spatial coverage will improve representativeness and strengthen policy evaluation.

Given rural/off-grid housing patterns in Wales, SIA encourages Welsh Government to ensure that any additional monitoring and siting strategy captures a balanced spread of dwelling location types (urban, suburban and rural small towns) so that "heat in buildings" interventions are evaluated against representative exposure contexts, consistent with CAAP's emphasis on spatial representativeness and monitoring sufficiency.

The SIA would also encourage further research into source apportionment in poor air quality area to investigate exactly what is the cause of emissions. For example anecdotally many instances of stove use being blamed for poor air quality have been bonfires on allotments or other sources of combustion. For effective action the causation should be accurately defined.

Q7. Question 4a: To what extent do you agree with the provision in the draft regulations to allow the subtraction of the 'natural contribution' to particulate matter where exceedances of a target are due in whole or in part to these natural contributions?

Agree

Q8. Question 4b : Please explain your answer.

The SIA agrees in principle with allowing subtraction of natural contributions where exceedances are demonstrably caused wholly or partly by natural sources.

The consultation acknowledges both the significant natural and transboundary component of PM2.5 and the complexity of distinguishing natural and anthropogenic sources. A subtraction provision is therefore appropriate provided it is applied transparently and only where robustly justified.

We recommend Welsh Government:

1. Publishes the methodology used when applying subtraction
2. Clearly reports uncertainty and assumptions
3. Reviews the approach periodically as scientific methods evolve

This will maintain confidence that the targets remain meaningful public health indicators while accounting for sources outside policy control.

Q9. Question 5: We have asked some specific questions. If you have any other relevant thoughts or comments on our proposals, please provide them here.

Proportionate approach to domestic combustion: The consultation identifies domestic combustion as a contributor to population-weighted exposure within Wales. The SIA supports action where evidence shows clear reductions can be achieved, particularly through targeting higher-emitting fuels and legacy appliances. Differentiated measures are more effective than blanket restrictions that do not distinguish between appliance performance, fuel quality or user behaviour.

Focus on effective interventions: Illustrative measures outlined in the consultation — including restrictions on coal, wet wood regulation, appliance standards and behaviour change communication — represent examples of targeted approaches likely to reduce emissions while maintaining consumer choice and heating resilience. In addition, mandatory annual chimney sweeping could be considered. Consideration of future regulation on outdoor burning should be taken into consideration and the SIA supports correct enforcement.

Household affordability and resilience: The supporting appraisal recognises households may bear transition costs. Policy delivery should therefore align with fuel poverty and energy resilience objectives, especially in rural and off-grid communities where secondary heating plays an important safety and resilience role during severe weather or outages.

Monitoring transparency: We welcome expansion of the monitoring network and encourage publication of a clear implementation plan covering site selection, representativeness and reporting, ensuring both hotspot concentrations and population exposure are robustly assessed.

Submit your response

Q10. Please provide the first part of your home postcode e.g. CF10

ST5

Q11. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name Erica Malkin

Organisation (if applicable) Stove Industry Alliance Ltd (t/a Stove Industry Association)

Q12. If you want to receive a receipt of your response, please provide an email address.

Email address

[information redacted]

Q13. Responses to the consultation may be published. Your response will be anonymous.

However, if you would like your name to be published alongside your response, please tick the box.

I agree to my name being published alongside my response to this consultation.

Redacted information - regulation 13 - personal data.