

Consultation Response Form: Fine particulate matter air quality targets

Redacted information - regulation 13 - personal data.

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Submit to: airqualitypolicy@gov.wales

New Proposals for Consultation Questions

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

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Question 1b: Please explain your answer.

The proposal has undergone thorough assessment, with recommendations formulated and the approach peer-reviewed by relevant specialist consultees, including Ricardo Energy and Environment, the National Atmospheric Emissions Inventory (NAEI), the Clean Air Advisory Panel, and the Committee on the Medical Effects of Air Pollution (COMEAP). This review focused on the development and implementation of the proposed air quality monitoring strategy aimed at achieving future reductions in ambient PM_{2.5} concentrations.

PM_{2.5} fine particulate matter is widely recognised as having a significant impact on public health, contributing to reduced life expectancy and increased morbidity from both new and existing illnesses within affected populations. In particular, disadvantaged socio-economic areas in Wales have been identified as experiencing higher levels of respiratory disease, leading to ill health and lower life expectancy within these communities.

In preparing the assessment, Ricardo Energy and Environment utilised NAEI data to predict future background PM_{2.5} emissions, enabling an evaluation of the proposed target levels and compliance dates. This provides a clear basis for establishing the targets, as illustrated in Figure 7 of the consultation document.

A cost-benefit analysis has also been conducted, with outcomes summarised in Table 2 of the consultation document. The analysis demonstrates that all scenarios assessed—medium, high, and speculative—show significant potential public health benefits, including avoided deaths, improved quality of life, reduced NHS costs, and increased economic productivity due to better overall health. The associated implementation costs for each scenario are considered proportionate, being substantially outweighed by the financial and societal benefits identified.

These observations indicate that the consultation document has undergone robust scrutiny regarding both practical implementation and potential outcomes. On this basis, this authority strongly supports the proposed actions to implement the Air Quality Monitoring and Compliance Targets (AMCT), recognising the significant benefits for public health and wellbeing across Wales.

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

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Question 2b: Please explain your answer.

For the same reasons given at 1b for the AMCT above

Question 3a: To what extent do you agree with the proposed arrangements for assessing PM_{2.5} levels and achievement of the targets?

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Question 3b: Please explain your answer.

The consultation document confirms that the proposed arrangements for assessing PM_{2.5} have been endorsed by independent expert advice. The experts provided recommendations on appropriate monitoring techniques and the relevant standards to be applied within the monitoring protocols. Specific methodologies are recommended in alignment with the Air Quality Monitoring and Compliance Targets (AMCT) and Pollutant Emission Reduction Targets (PERT), ensuring a consistent and scientifically robust approach to monitoring and assessment.

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?

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Question 4b: Please explain your answer.

We strongly support the provision to subtract natural contributions from PM_{2.5} exceedances because these sources, such as sea salt, volcanic material, and suspended soils and dusts, are beyond the control of policy or regulation. Allowing subtraction ensures compliance assessments fairly reflect controllable pollution sources and avoids penalising stakeholders for factors outside their influence.

We also welcome the emphasis on robust, evidence-based methods for determining natural contributions, as well as the strong governance framework of monitoring, reporting, and periodic review, which ensures transparency, accountability, and continued protection of public health.

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

We support the proposals outlined in the consultation document. The approach to monitoring and reducing PM_{2.5} concentrations is scientifically robust, evidence-based, and aligned with independent expert recommendations. The inclusion of clearly defined methodologies, standards, and targets through the AMCT and PERT frameworks provides confidence that the proposed measures are both practical and effective.

We particularly welcome the recognition of the public health impacts of fine particulate matter, including the disproportionate effects on disadvantaged communities, and the emphasis on achieving meaningful reductions to improve health outcomes, life expectancy, and overall quality of life.

The cost-benefit analysis demonstrates the substantial societal and economic advantages of implementing the proposed measures, reinforcing the value of early and proactive action.

We also emphasise the importance of ensuring that local authorities are adequately resourced to carry out the monitoring, reporting, and compliance activities required to meet the targets, as sufficient funding, staffing, and technical support will be critical to the success of this programme.

Overall, we are fully supportive of the proposals and encourage their timely implementation, with ongoing monitoring, transparent reporting, and continued review to ensure that both the targets and health benefits are realised across Wales.

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.

Please provide a part post code: *[information redacted]*

