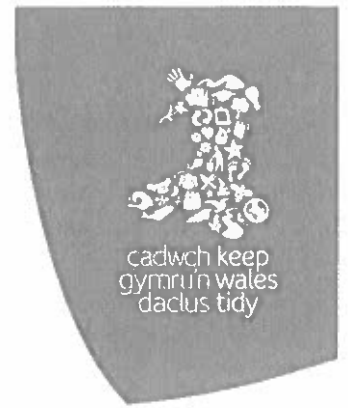


**Keep Wales Tidy: Response to consultation on fine particulate
matter air quality targets**

February 2026



NAME: Angharad James

ORGANISATION: KEEP WALES TIDY, (Registered Charity no. 1082058),
sbarc|spark, Maindy Rd, Cardiff CF24 4HQ

CONTACT: leq@keepwalestidy.cymru

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 consultation document explains clearly why this level of ambition is reasonable given the extent of external air pollution entering Wales that is not within Welsh Governments control. However, it is important that Welsh Government continues to engage with the UK and International Governments to reduce this source of air pollution and its impacts on people living in 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.

The consultation document explains clearly why this level of ambition is reasonable.

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.

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.

This is a reasonable way to assess what are deemed the 'more harmful' sources of PM2.5 pollution during exceedances. However, it's important that PM2.5 from natural sources is monitored in and of itself and not just for removal during exceedance purposes. Hotter and dryer summer conditions associated with climate change may increase soil erosion and lead to increases in PM2.5 from suspended soils and dusts. Monitoring these levels and their impacts on the population may be valuable in the long term and contribute towards land management and agricultural policy in future.

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

Multidisciplinary and holistic measures

It is critical that all sources of air pollution are considered in the "measures to address PM2.5 air pollution" and not just the most common ones. Although this consultation seeks to prevent new illnesses associated with poor air quality, it should also look further at pollution events' impacts on those already living with these illnesses. One-off, infrequent, localised or short term events still have the potential to cause extreme respiratory stress including, but not limited to, school drop-off and pick-up times where idling cars are still a common feature, wildfires (natural, accidental or otherwise – especially as they become more frequent due to climate change), fires at waste sites (currently increasing in frequency due to battery fires), burning of agricultural waste, mass use of ammonia fertilizers and firework displays as well as Wales' wider industrial strategy.

Therefore, to form an effective air quality policy for everyone, the measures to address PM2.5 must be multidisciplinary and consider issues and solutions holistically. For example, "no idling zone" campaigns outside schools could be an interim solution, but legislation to allow enforcement of these may be needed in the future. Similarly, battery fires in bin lorries and at waste sites are becoming more common due to single use (perceived or actual) and low-quality technology, but mandatory separation requirements for WEEE (as in the Business Recycling Regulations) and awareness campaigns for consumers could help reduce this.

On the other hand, there is already legislation preventing the burning of agricultural plastic, but lack of enforcement, no requirement for reporting, regulation loopholes and collapse of recycling schemes mean the legislation is ineffective. Therefore, addressing barriers to issues in other disciplines (e.g. waste and agriculture) will indirectly improve air quality, especially for those who are already vulnerable, by reducing the occurrence of one-off, infrequent, localised or short-term events. This more integrated approach also reflects the principles of the Wellbeing of Future Generations Act.

Fairness and disadvantaged communities

Nonetheless, it should be ensured that all air quality improvement measures should not disproportionately affect disadvantaged people and communities. For example, although ULEZ's aren't mentioned specifically, it is assumed that this would be one of the proposed methods used to encourage the transition to ULEVs. It is essential that this doesn't overburden those who cannot afford newer and more efficient vehicles as these are also likely to be the people who would struggle

to afford any charges or shifts to different modes of transport. It is also important to note that a potential shift toward new ULEVs is somewhat contradictory with Welsh Governments ambition to become a circular, less wasteful nation considering that older vehicles are longer-lasting, easier and cheaper to repair than newer cars. However, we highlight the overwhelming benefits that an affordable multi-modal public transport system could bring to Wales – reducing traffic, alleviating environmental pollution and improving air quality. Currently, this is too focused on urban areas and is not reaching rural areas where reliance on personal vehicles likely contributes higher proportionally to air pollution than in urban areas.

Additionally, future policies to improve air quality should strongly consider wider cultural and societal impacts. For example, restrictions on wood burning could amplify fuel poverty or penalise those who are on lower incomes like those who have purchased 'off-grid' homes due to their lower energy costs. Therefore, taking action on fuel poverty, as well as facilitating and even subsidising energy modal shifts is part of the solution.

However, it is acknowledged that it is often the most disadvantaged communities that live and work in industrial areas and there is a balance to find between improving air quality in these places where it is needed most, and mitigating the risk of job losses due to air quality improvement measures (e.g. steels work in Port Talbot). In these instances, local investment for job creation and upskilling of workforces into cleaner industries is critical and a matter of environmental justice.

Awareness, understanding and behaviour change

Lastly, it is worth noting that all these measures will require a significant effort in increasing awareness and understanding. The last section below suggests some ways to go about this in relation to air quality and linked behaviors from a behavioral perspective.

The Canadian Government's Public Health Initiative 'Air Quality Health Index'¹ (AQHI) which aimed to protect the public's health from exposure to air pollution, was reviewed by a consortium of researchers from Canada and South Africa. The aim of this research was to identify and explain factors influencing AQHI adoption at the individual level and to establish intervention strategies.²

Some of the key findings from the research have been replicated in other, smaller studies of this kind. They include:

- Increasing AQHI knowledge is critical for AQHI adoption to occur.
- Perceived susceptibility, perceived severity, perceived benefits, perceived barriers, cues to action, and self-efficacy need to be considered with respect to AQHI adoption.
- Reasons for not checking and following health messages varied between lower and higher SES (socio-economic status) groups. Moreover, self-efficacy was apparent as a reason for not checking and following AQHI health messages.

¹ This is different to their 'Air Quality Index', which is a monitoring and information tool only.

² Radisic, R et al (2016), 'Factors influencing health behaviours in response to the air quality health index: a cross-sectional study in Hamilton, Canada', *Environmental Health Review*, 2016, 59(1): 17-29 Available at: <http://pubs.ciphi.ca/doi/full/10.5864/d2016-002> Accessed: 12/09/2017)

- Demographics (gender, age, education, and area of residence), knowledge/understanding, and individual perceptions (neighbourhood air effects on health) were significant predictors of AQHI awareness, checking, following health messages, and adoption.
- The findings suggest that intervention strategies must account for gender differences in awareness and following health messages. This study's findings are consistent with a US study on the Air Quality Index (AQI) and awareness which found that women were less likely to be aware than men.
- Although females were less aware of the AQHI than males, they were more likely than males to follow AQHI health messages. Researchers who examined sun protective behaviour also found that females were more likely to engage in the health protective behaviour than males.
- In addition, intervention strategies must focus on increasing knowledge/understanding of AQHI. Therefore, intervention strategies must clearly define the at-risk populations such that they are able to self-identify and understand that they are considered at risk
- Furthermore, interventions strategies must account for variations in environmental risk perceptions found in lower and higher SES areas of the city. This is consistent with other studies that found sensory cues prevail over AQI.

This learning (amongst other available data sets) could form a reasonable basis for designing a behavioural approach in relation to air pollution and subsequent behavioural interventions (in the context of health-related messages) for Wales.

For example, using the above data could mean:

- A program aimed at increased knowledge and understanding
- Messages and interventions tailored differently for different socio-economic areas
- Targeting of messages in women's magazines or messages aimed at the 'school run'
- Community 'champions' or activists to support the dissemination of information in particular demographics (the advice of 'lay' people in the health sector are often better received than professionals).

Much of the literature around air quality and behaviour change has been concerned with the study of transport use. A report for SEWEB (Scotland's Environment Web)³ presents an extensive review of behaviour change information in the context of air quality interventions (focusing on transport use). Key findings from this conclude:

- Rejection of proposals for congestion charging are linked to uncertainties over the impacts of the charge as well as a lack of information to those who will be affected
- Increasing road charges is likely to reduce car use and increase public transport use
- Preferential taxes for lower emission cars results in increased sales and a potential reduction in air pollution

³ Cowie H et al. (2015), '*Air Quality, Health, Wellbeing and Behaviour*', Available at: <http://www.environment.scotland.gov.uk/media/126007/iom-seweb-aq-health-behaviour-review.pdf> (Accessed: 12/09/2017)

- In some locations, the use of travel plans with individualised information and the request to make a behavioural plan is found to increase public transport use
- The presence of crossing areas increases the likelihood of primary school age boys walking to school and feelings of safety and security increased the likelihood of girls walking to school
- The need to provide information that is relevant and targeted regarding environmental knowledge may have an impact on behaviour
- Aspects of urban design such as pedestrian and cycle paths that are well connected reduces dependency on private car use
- Those reporting less traffic noise reported actively travelling more frequently.

Taking this into account, behaviour change programs around air pollution could also include some of the following interventions regarding transport use:

- Consideration of urban infrastructure and networks with a special analysis of main school routes and identification of any lack of street crossings or consideration of street crossing supervisors ('lollipop' people) in certain areas
- Analysis of people's routes to work or school to identify barriers at a community level
- Business incentives for home working, remote work (e.g. Indycube model) or public transport use (this may need to be incentivised through government policy and concerted business engagement)
- Pilots of individualised travel plans in a problem area
- Environmental messaging may have an impact
- Charging traffic is likely to lead to reduced traffic use although infrastructure and communication remain key factors
- Financial levies are always better received when the revenues raised are not going to Government as it is then perceived as an additional tax. Perceptions of the single use carrier bag charge, for example, were more positive when people were told the money was going to charity.

A community-based approach could be designed in certain areas to address specific behaviours such as idling cars in traffic or outside schools. Over a two-week period, 50 volunteers from the behaviour change charity Global Action Programme, directly approached idling drivers in London to inform and spread the word about the dangers of air pollution and the effect of idling on pollution levels. Drivers were asked to switch off their engines and rewarded with a thank-you air freshener to hang in their vehicle to remind them of no idling behaviour. Although it was impossible to review the campaign in terms of longitudinal behaviour change or reduction in emissions, it embodied some of the key principles of a simple message, delivered face to face, a quick reward and long-term prompt.

A series of actions could also be developed into a 'pledge' which could be taken up by individuals or even town councils and businesses.

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: CF24

