

Fine particulate matter air quality targets

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 health and environmental benefits of lowering PM2.5 levels are clear and evidenced therefore setting a target for measuring concentrations of PM2.5's is largely supported.

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 logic behind setting a target that is aimed at tracking reduction in levels is sound and is largely supported in principle.

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.

Monitoring through a number of monitoring stations appears logical. The location of the 9 required additional monitoring stations will require consultation and careful consideration.

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.

It is difficult to argue against the subtraction of 'natural contribution', however ensuring the method of subtraction is robust will be challenging – especially in relation to gaining the public's trust for such a complex area. It should also be remembered that even with the subtraction, such a high proportion of contribution of PM_{2.5}'s that is outside Wales' control places great limits on the practical impact of Wales's own proposed PM_{2.5} targets.

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

From a Local Authority perspective, and one in North Wales that would likely be most impacted by PM2.5 targets, these proposed targets are largely welcomed. As a Local Authority we do, however, have some concerns relating our ability to impact these targets to any great degree. Will these targets place a burden on Local Authorities' that we have limited ability to impact?

There is also the broader question of the 'natural contribution' outside of Wales's control. The consultation document itself acknowledges that *"the majority of the concentration is therefore predicted to be outside of the control of measures taken in Wales"* and *"even if there were no manmade emissions in Wales at all it would be extremely challenging, if at all possible, to meet the annual mean WHO air quality guideline for PM2.5"*.

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