



Healthy Air Cymru Response:

Welsh Government Consultation Document:

Cleaner and healthier air: Consultation on draft regulations to implement fine particulate matter (PM_{2.5}) air quality targets.

About Healthy Air Cymru

Healthy Air Cymru (HAC) brings together organisations that share a common vision for a cleaner and greener Wales. We want our nation to be a better place, where people have the right to breathe clean air and do not have to suffer from the harmful effects of air pollution.

We raise awareness of the impact of poor air quality on our everyday lives. We aim to shape the conversation in Wales about how we tackle these problems and influence policy decisions; to make the case for practical local solutions to reduce air pollution

Question 1a

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

Strongly disagree

Question 1b

Healthy Air Cymru welcomes the Welsh Government's commitment to improving air quality but remains concerned that the proposed AMCT lacks ambition. The suggested target of 10 µg/m³ by 2035 is not aligned with the World Health Organization guideline of 5 µg/m³, and the scientific consensus is clear: no level of PM_{2.5} exposure is safe. Even

low concentrations contribute to serious respiratory, cardiovascular and neurological harm, and Wales continues to experience thousands of preventable pollution-related deaths each year.

This consultation represents a crucial opportunity for Wales to take a stronger and more ambitious approach. HAC members believe Wales should adopt a statutory target of 10 $\mu\text{g}/\text{m}^3$ by 2030, supported by meaningful policy interventions, and develop a clear strategy to meet the 2021 WHO Air Quality Guidelines.

Question 2a

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

Strongly disagree

Question 2b

Wales's current level of ambition of 25% falls behind that of other UK nations. England has committed to reducing population exposure by 30% by 2030 and is consulting on tougher measures such as wood-burning restrictions. Scotland has similarly advanced bold policies. Given Wales's strong public-health leadership record, the PERT should reflect comparable ambition.

Question 3a

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

Agree

Question 3b

We agree with the proposed arrangements for assessing PM2.5 levels and achievement of the targets.

Question 4a

To what extent do you agree with the provision to subtract 'natural contributions' where exceedances are partly or wholly due to natural sources?

Agree

Question 4b

Healthy Air Cymru agrees with the proposal to subtract “natural contributions”, as these contribution do not impact health when compared with the dominant, preventable anthropogenic sources of PM_{2.5} in Wales.

Our primary concern is the overall concentration of particulate matter that people are exposed to, and these concentrations come overwhelmingly from human activity, not natural events. Around 38% of PM_{2.5} in Wales comes from domestic burning, and a further significant proportion arises from secondary particulates formed from ammonia

Ammonia derived PM_{2.5} is not properly accounted for in existing modelling or monitoring arrangements. Given that the greatest health burden comes from these avoidable, humanmade emissions, the question of subtracting natural contributions does little to address the core challenge.

For Healthy Air Cymru, the priority must be reducing total concentrations of harmful pollutants.

Question 5

Healthy Air Cymru strongly encourages Welsh Government to adopt a far more ambitious and health-protective approach. The proposed PM_{2.5} limit of 10 µg/m³ by 2035 is not aligned with WHO guidance nor with the level of ambition seen in England or Scotland. Thousands of preventable pollution-related deaths occur annually in Wales, placing a significant burden on communities and the NHS.

The modelling underpinning the proposals appears overly pessimistic and does not consider the full range of policy tools available, such as Clean Air Zones, Low Emission Zones, or wider smoke-control measures. Furthermore, the omission of ammonia-derived secondary PM_{2.5} significantly understates the scale of action required.

Healthy Air Cymru urges Welsh Government to adopt targets that drive transformative change, not ones that simply confirm existing projections. We also encourage Ministers to move faster on setting additional pollutant targets than the bare minimum of one pollutant required by the Environment (Air Quality and Soundscapes) (Wales) Act 2024 and to address both NO₂ and ammonia ahead of the statutory deadline.

Healthy Air Cymru

- Asthma + Lung UK Cymru
- British Heart Foundation Cymru
- Cycling UK Cymru
- Chartered Institute of Environmental Health

- Friends of the Earth Cymru
- Children in Wales
- Living Streets Cymru
- Clean Air Programme (Wales)
- Ramblers Cymru
- Royal College of Paediatrics and Child Health Wales
- Royal College of Physicians Wales
- Royal College of Psychiatrists (Wales)
- Transport Action Network Cymru
- Walk Wheel Cycle Trust Cymru

For additional information please contact *[information redacted]*

Redacted information - regulation 13 - personal data.