

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

We support measures to secure compliance with the WHO Guideline Value (5µg/m³) as soon as possible. Breathing polluted air over the long-term has a major impact on health, wellbeing and inequalities in Wales, leading to morbidity and mortality from respiratory and cardiovascular conditions (Brunt et al., 2017; Grey et al., 2018; Welsh Government, 2020). Air pollution affects everyone and can particularly affect some individuals who are more vulnerable to harm - including children, the elderly, and those with pre-existing health conditions. However, average air pollution concentrations have been found to be higher in the areas of Wales with the highest levels of income related deprivation, and this contributes to inequalities in health outcomes (Brunt et al., 2017). Compliance with the WHO Guideline Value (5µg/m³) will reduce the health harms associated with exposure, and lead to population health gain. The work undertaken to inform and support the consultation indicates that no scenario tested will result in an earlier compliance with the WHO Interim 4 concentration (10µg/m³), or compliance with the WHO Guideline Value, as such, we conclude that the level of ambition is pragmatically appropriate. However, an accelerated time scale towards compliance would be welcomed to reduce PM2.5 exposure and its associated health burdens.

<https://doi.org/10.1093/pubmed/fdw084>

<https://phw.nhs.wales/services-and-teams/knowledge-directorate/research-and-evaluation/publications/making-a-difference-reducing-health-risks-associated-with-road-traffic-pollution-in-wales/>

<https://gov.wales/clean-air-plan-wales-healthy-air-healthy-wales>

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.

We support the level of ambition proposed for the Population Exposure Reduction Target (PERT). To increase the level of ambition, an interim target of 20% by 2030 could ensure that a reduction in PM2.5 levels happens as early as possible. A higher reduction at an accelerated pace would be welcomed given that there is no safe threshold for PM2.5 exposure with disproportionate effects on our most vulnerable communities.

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.

We agree with the Clean Air Advisory Panel recommendation that PM2.5 compliance assessment should be based on fixed monitoring, using standard methods deployed at appropriate site locations at a sufficient number of sites.

We would recommend local consultation be undertaken with Local Authorities in areas where monitors are proposed and consider additional consultation with members of the public living in the vicinity of the proposed monitors, with sensitivity, to encourage engagement with the measures and the purposes of the targets. The proposals should detail not only assessment, but the interim reporting timescales prior to 2036, so that progress can be monitored by those interested and used to engage local communities.

We are particularly contented that the biggest reduction in PM2.5 will occur in the 35 most populous regions of Wales which includes areas with both the highest and lowest levels of deprivation, and areas with the highest proportion of children, and Black, Asian and Minority Ethnic residents. This reduction in PM2.5 in the most populous regions of Wales will contribute to improved health and more equitable outcomes recognising that there is a disproportionate burden of air pollution mortality in deprived regions.

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.

We agree with this provision, providing that any subtraction that has occurred is clearly presented alongside the original data for clarity, transparency and to enhance understanding. Any data where subtraction has occurred should be clearly presented as such, ideally with the original data and amount subtracted presented alongside for the purposes of clarity, transparency and to enhance understanding. The draft regulations include "wild-land fires" in the list of contributions from natural sources and it is recommended that this is excluded from the group. It will not be possible to remove the wild-land fire contribution from those attributed to directly or indirectly by human activities (South Wales Fire & Rescue Service, 2026).

<https://www.southwales-fire.gov.uk/newsroom/news/working-together-to-protect-our-countryside-and-our-country-3/>

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.

The proposals indicate where emission reductions will be required to meet the 2035 target, however there is little detail in how these emission reductions will be achieved. A larger population health benefit could be realised if non-emission exposure benefits (specifically those associated with active travel) were included. We appreciate the work undertaken to determine the ambition of measures ("medium", "high" and "speculative") but suggest these measures be linked directly to policy.

As we move towards compliance with the limit values in The Air Quality Standards (Wales) Regulations 2010, there will be less of a role placed on Local Authorities air quality management responsibilities. Local Authorities have been important in driving local air quality improvements, we recommend that their expertise and resource is utilised in delivering the annual mean concentration target (AMCT).

The proposal will not result in Wales realising the WHO guideline ($5 \mu\text{g}/\text{m}^3$). Any level above $5 \mu\text{g}/\text{m}^3$ still poses a risk to health; there is no safe threshold. A clear roadmap for moving beyond $10 \mu\text{g}/\text{m}^3$ toward the WHO guideline levels in the longer term should be published, working in partnership with others to reduce emissions generated beyond Wales.

The transition to electric vehicles and changes to industrial emissions will be responsible for the majority of the reductions of PM2.5. The drivers for some of these (e.g. the Zero-emission Vehicle (ZEV) Mandate) are outside of the control of the Welsh Government, as such the contribution they make to emission reduction may need to be viewed with more caution.

Submit your response

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

[information redacted]

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

Name

Organisation (if applicable) Swansea Bay Public Health Team

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

Email address

No Response

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.

No Response

Redacted information - regulation 13 - personal data.

