

Air quality: Draft Clean Air Strategy 2018 consultation

Confor: Promoting forestry and wood (www.confor.org.uk) is a not-for-profit membership organisation which represents 1500 sustainable forestry and woodusing businesses across the UK. Confor represents the whole forestry and wood supply chain and focuses on strategic issues vital to the success and sustainable future of the sector.

Confor is happy for this response to be published.

Confor is commenting on Chapter 6: Action to reduce emissions at home, and Chapter 7: Action to reduce emissions from farming.

Response to question

Question 13: What do you think of the package of actions put forward to reduce the impact of domestic combustion? Please provide evidence in support of your answer if possible.

The consultation document rightly states, "Not all forms of domestic burning are equally polluting. The appliance (e.g. stove or fireplace), how well it is used and maintained and what fuels are burnt in it, all make a big difference to how much pollution is produced. Significant air quality benefits can be realised through a new efficient appliance as compared with an old stove or open fire. There are simple steps that households can take to limit emissions both indoors and out. Using cleaner fuels, in a cleaner appliance which is installed by a competent person, knowing how to operate it efficiently, and ensuring that chimneys are regularly swept, will all make a big difference. Defra has developed simple guidance¹ for all local authorities to share with residents on these simple steps."

Confor supports the guidance Defra has produced for local authorities.

The consultation document states that Government:

- Will legislate to prohibit sale of the most polluting fuels.
- Will ensure that only the cleanest stoves are available for sale by 2022.

¹ https://uk-air.defra.gov.uk/assets/documents/reports/cat07/1712041200_171010_open_fires_wood_burning_stoves_FINAL.pdf

- Will give new powers to local authorities to take action in areas of high pollution, bringing legislation into the 21st century with more flexible, proportionate enforcement powers.
- Will work with industry to identify an appropriate test standard for new solid fuels entering the market.
- Will ensure that consumers understand what they can do to reduce their impact from burning.

Confor supports this suite of measures and notes that Government has already gathered evidence. “We received evidence from a wide range of respondents, some of whom called for a total ban on domestic burning, primarily due to personal experience of nuisance or health impacts. Others felt that there should be no restrictions at all or were concerned about the impact on those in fuel poverty. Some suggested that more should be done to help inform consumers; many are unaware of the impacts of burning waste or cheaper fuels, and some unscrupulous suppliers market wood as seasoned, when it is not. Many chimney sweeps highlighted the point that how a stove is used can have a significant impact on emissions. Most wood fuel businesses which responded indicated that they would be able to adjust to any proposed regulations on fuel standards. However, most coal businesses felt less able to adjust and were concerned about the impact. This feedback will be taken on board and inform policy. We will consult carefully on the appropriate phase in periods for wood and coal.”

Confor has worked with Woodsure to promote the “Ready to Burn” scheme to its members and the woodfuel industry. Confor worked with Government, and partners, to establish Grown in Britain² and its woodfuel licensing scheme³. Confor also worked with government to develop the Biomass Suppliers List (BSL) and its risk assessment⁴.

Confor recently published its paper on plant health and Brexit⁵ which calls for the ban on imports of firewood in the next five years. Confor was invited to discuss this report on Radio 4's Farming Today programme⁶.

Confor urges Government to support a “Buy local, Burn local” campaign, promoting the use of well-seasoned, locally produced firewood, to not only abate PM emissions but to sustain the management of our woodlands and help to bring

² <https://www.growninbritain.org/>

³ <https://www.growninbritain.org/for-woodfuel-producers/>

⁴ [https://biomass-suppliers-list.service.gov.uk/Content/Documents/uk-risk-based-regional-assessment-for-bsl-v1-2%20\(3\).docx](https://biomass-suppliers-list.service.gov.uk/Content/Documents/uk-risk-based-regional-assessment-for-bsl-v1-2%20(3).docx)

⁵ <http://www.confor.org.uk/media/246818/plant-health-and-brex-it-statement-jan18.pdf>

⁶ <https://www.bbc.co.uk/programmes/b09pjgh7>

unmanaged woodlands back into management and protect our woodland resource from pests and diseases.

Q16. What do you think of the package of actions put forward in the farming chapter? Please provide evidence in support of your answer if possible.

The consultation document states that Government:

- Will provide a national code of good agricultural practice to reduce ammonia emissions
- Will regulate to reduce ammonia emissions from farming and are seeking views on 3 possible approaches to regulation
- Proposes to require and support farmers to make investments in the farm infrastructure and equipment that will reduce emissions
- Proposes that a future environmental land management system should fund targeted action to protect habitats impacted by ammonia
- Will continue to work with the agriculture sector to ensure the ammonia inventory reflects existing farming practice and the latest evidence on emissions
- Will task a group of independent experts to make recommendations by November 2019 on the maximum limits that should be applied for (organic and inorganic) fertiliser application, taking account of economic efficiency and commitments to reduce ammonia and greenhouse gas emissions from agriculture, and to protect sensitive habitats and water bodies.

Confor cannot see any reference to the role of tree planting in the abatement of ammonia emissions from farming. Ammonia emissions from livestock production can have negative impacts on nearby protected sites and ecosystems that are sensitive to eutrophication and acidification. Trees are effective scavengers of both gaseous and particulate pollutants from the atmosphere making tree belts potentially effective landscape features to support strategies aiming to reduce ammonia impacts. Using agro-forestry systems of differing tree structures near 'hot spots' of ammonia in the landscape could provide an effective abatement option for the livestock industry that complements existing source reduction measures⁷

There is a growing body of evidence to support the use of existing woodland plantations and planting new forestry to mitigate emissions, through scrubbing

⁷ http://nora.nerc.ac.uk/id/eprint/509967/1/ERL_9_12_125001.pdf

of NH3 at source and subsequent re-use of scrubbed nutrients. UK scale modelling shows that targeted application of tree planting around agricultural installations would have a modest effect by modifying 'on-farm' emission factors, however when the approach is targeted in regions hot-spot emissions, significant effects on NH3 and N-deposition can be achieved ⁸

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27 July 2018

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8

http://randd.defra.gov.uk/Document.aspx?Document=12611_AgroforestryforAmmoniaAbatement20pagereportFinal_080115.pdf