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Clean Air Strategy Public Consultation
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Reference: EPAC-0126

Re: Updating Clean Air Strategy 2026

Dear Sir/Madam,

The Environmental Protection Agency (EPA) welcomes the opportunity to contribute to the review of Ireland's Clean Air Strategy. We acknowledge the Department's commitment to improving air quality and note that air pollution remains the most significant environmental health risk in Ireland and across Europe. The EPA's [State of the Environment Report 2024](#) highlights that exposure to air pollution is harmful to human health, wellbeing, and the environment.

The EPA's [Air Quality in Ireland Report 2024](#) confirms that, although air quality generally meets EU legal limits, it falls short of the stricter WHO guidelines and the targets set in Ireland's Clean Air Strategy. Solid fuel burning and transport emissions remain key challenges. Strong collaboration with all relevant stakeholders must be prioritised in the Strategy to support compliance with Target 1 of the EU Zero Pollution Action Plan: reducing the health impact of air pollution (premature deaths) by more than 55%. Action on these issues will also contribute to Ireland's efforts on the UN Sustainable Development Goals.



Cleaner domestic heating and reduced traffic emissions are critical to achieving these goals. In this context, the EPA wishes to make specific recommendations for consideration in the updating of the Strategy, as outlined below:

1. Policy Alignment

The EPA welcomes a national approach to managing Ireland's air environment. To be effective, the Clean Air Strategy should adopt an integrated approach that addresses multiple environmental challenges together. This means identifying and prioritising measures to reduce air pollution with co-benefits to mitigate noise and tackle climate change. Air quality, noise, and greenhouse gas emissions are interconnected issues, particularly in transport, and tackling them in isolation can lead to missed opportunities or unintended consequences. By aligning air pollution controls with noise reduction strategies and climate action, Ireland can deliver a more holistic, sustainable solution that protects public health, improves quality of life, and supports national climate goals.

2. Alignment of Interim Targets

Since the establishment of the Clean Air Strategy, the new EU Ambient Air Directive 2024 (2024/2881/EU) has been published. The EPA recommends aligning the interim Clean Air Strategy targets for 2026 and 2030 with the air quality standards set out in Annex 1 of the Directive. Such alignment would greatly facilitate data analysis and ensure consistency in reporting and assessment. Furthermore, the EPA advises retaining the target of achieving compliance with WHO recommendations by 2040, as this provides a clear and ambitious signal of the Strategy's intent.

3. Enhanced Enforcement

The EPA's [Local Authority Environmental Enforcement Performance Report 2024](#) highlights insufficient resources for air enforcement, resulting in slower progress compared to waste and water enforcement. To ensure compliance with the increasingly stringent air quality standards mandated for 2026 and 2030, the Environmental Protection Agency (EPA) recommends that the following measures be incorporated into Annex 1 of the Clean Air Strategy:

- **Intensified Regulatory Framework:** Strengthen legislation to secure substantive improvements across all pollutant categories.
- **Regional Enforcement Infrastructure:** Establish robust regional support structures dedicated to air quality enforcement.



- **Targeted Enforcement of National Priorities:** Actively pursue the delivery of National Enforcement Priorities, with particular emphasis on systematic inspections of solid fuel retailers, producers, and distributors countrywide.
- **Augmented Enforcement Powers:** Confer expanded statutory powers upon enforcement personnel, including authority to seize, detain, and dispose of non-compliant materials from producers, retailers and distributors (excluding end users).
- **Additional Resources:** Local Authorities need to assign appropriate resources to national enforcement priorities under air.
- **Escalated Sanctions:** Introduce significantly increased penalties and fines for entities contributing to air pollution.
- **Evidence-Based Local Interventions:** Require local authorities to utilise air quality data to identify and remediate localised pollution issues.
- **Policy Reinforcement on Solid Fuel Reduction:** Strengthen policy instruments aimed at curtailing solid fuel use for domestic heating, complemented by retrofit and energy efficiency initiatives.
- **Enhanced Inter-Agency Collaboration:** Promote collaboration, engagement and knowledge exchange between Local Authorities through NIECE.

The EPA will play their part in implementing certain measures.

4. Timely and Effective Implementation

The EPA welcomes the Department's pilot projects designed to support local authorities in developing roadmaps and air quality plans required under the new EU Ambient Air Directive (2024/2881/EU). These initiatives will play a key role in identifying and implementing targeted policy measures to address local air quality challenges. Their success will depend on the timely roll-out of actions across all sectors, the promotion of cleaner heating systems, and strong collaboration with key stakeholders, including the National Transport Authority, Transport Infrastructure Ireland, the Department of Transport, Port Authorities, and Dublin Airport Authority. The Strategy should identify clear actions to drive down emissions from transport. Furthermore, the EPA recommends that the Strategy clearly define how local authorities will collaborate with all relevant stakeholders (incl. transport bodies) to implement the control measures outlined in the roadmaps and air quality plans required under the new Directive.



5. Public Awareness

The EPA welcomes the Department's www.cleanair.ie website and the national clean air advertising campaign to date. The EPA recommends further efforts to promote and raise public awareness of the health impacts of both indoor and outdoor air pollution. The Strategy should also consider how all key stakeholders can communicate consistent messaging, as unified and clear messages are more effective in engaging the public and driving behavioural change. This is currently being done within the Clean Air Communication Group led by DCEE. This group provides an opportunity to engage with the Department of Health and the Health Service Executive (HSE) to communicate the positive health impacts of changes in transport and the use of solid fuel. The cross-departmental national One Health Oversight Committee, and its associated subgroups, also offer relevant multi-sector fora to engage in relation to air quality. Recognising that the health of people, animals and our environment are closely linked and interdependent, the One Health Oversight Committee aims to facilitate collaboration and cooperation, within and beyond the health sector, to enhance intelligence and improve evidence for decision-making in relation to health threats.

6. Additional Considerations that the EPA Supports

Maintaining the Clean Air Research Forum and continuing to provide a robust evidence base is essential to improving our understanding of pollution sources and their impacts on health. This knowledge will enable more effective measures to address these issues.

Ammonia emissions are projected to remain within compliance under both the 'With Existing Measures' and 'With Additional Measures' scenarios through to 2030. However, full implementation of abatement measures is necessary to maintain compliance with ammonia emission ceilings.

Continued long-term monitoring, as mandated by the Ambient Air Directive (2024/2881/EU), remains essential. In addition, the ongoing maintenance and development of the National Ecosystem Monitoring Network (NEMN) is critical. This network, coordinated by the EPA and mandated under the NEC Directive, should be used by DCEE to monitor the impacts of air pollution on sensitive ecosystems.

Finally, the EPA notes that the Clean Air Strategy was screened out for Strategic Environmental Assessment (SEA) in 2023. The requirements of the SEA Directive should be fully considered in the finalisation of the Strategy.



We look forward to continued collaboration to ensure successful implementation of the Clean Air Strategy, leading to improved air quality and public health protection for all.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'Patrick Byrne'. The signature is written in a cursive style.

Mr. Pat Byrne

Director

Office of Radiation Protection and Environmental Monitoring