



PAVEE POINT
TRAVELLER AND ROMA CENTRE

Submission to Department of the Environment, Climate, and Communications

Consultation on the Clean Air Strategy for Ireland

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Pavee Point Traveller and Roma Centre

Pavee Point Traveller and Roma Centre ('Pavee Point') has been working to challenge racism and promote Traveller and Roma inclusion in Ireland since 1985. The organisation works from a community development perspective and promotes the realisation of human rights and equality for Travellers and Roma in Ireland. This focus on human rights extends to the right to breathe clean air, which in 2019 the United Nations Special Rapporteur on Human Rights and the Environment contended had "implications for a wide range of human rights, including the rights to life, health, water, food, housing and an adequate standard of living."

Pavee Point is comprised of Travellers, Roma, and members of the general population, who work together in partnership to address the needs of Travellers and Roma as minority ethnic groups experiencing exclusion, marginalisation, and racism. Working for social justice, solidarity, and human rights, the central aim of Pavee Point is to contribute to improvement in the quality of life and living circumstances of Irish Travellers and Roma.

Introduction

Pavee Point welcomes the opportunity to make a submission on the draft "Clean Air Strategy for Ireland". As minority ethnic groups, Travellers and Roma are among the most marginalised and excluded individuals and groups in Ireland. They experience stark health inequalities, poor accommodation conditions, poverty, low educational attainment and literacy levels, high levels of unemployment and intersectional forms of discrimination and racism.

Air pollution impacts Travellers and Roma more than the general population for several reasons, including the accommodation they have access to, the healthcare they can access, and their higher rate of respiratory illnesses.¹ Indeed, a report from the European Environment Agency demonstrated that air pollution impacts are unevenly distributed across groups in Europe. In addition to minority ethnic groups, the elderly, children, and those of lower socioeconomic status are more affected by air pollution. Children are uniquely vulnerable to air pollution, particularly traffic related air pollution near schools because of engine idling.² Ireland's EPA notes that: "*People of lower socio-economic status tend to be disproportionately exposed to environmental pollution (such as air pollution), and this may be exacerbated in the future without appropriate policies to protect those most vulnerable in our society.*"³

Pavee Point is also aware of the escalating issue of energy poverty in Ireland. Between December 2020 and December 2021, the cost of electricity rose by 22.4% and gas by 27.7%. Energy costs are now 34% higher than December 2016.⁴ Fuel poverty is a common issue among Travellers, as they are largely dependent on traditional sources of fuel, such as turf, wood, and bottled gas to heat their homes. Air quality, then, is not only a matter of environment and health quality, but of economic and housing justice. In fact, a 2019 report by Traveller MABS revealed that Traveller families in trailers

¹ [All Ireland Traveller Health Study \(2010\).](#)

² [European Environment Agency: Unequal exposure and unequal impacts: social vulnerability to air pollution, noise and extreme temperatures in Europe \(2018\).](#)

³ [Environmental Protection Agency Ireland. Environment and Wellbeing.](#)

⁴ [Doubling of €100 credit for electricity bills on cards to help with rising costs](#)

spend on average between 26.1% (median) and 28% (mean) of their income on energy, which is six times higher than the corresponding figure of 4.6% of the population.⁵

1. Do you agree with the five strategic priorities outlined in the draft strategy?

Pavee Point agrees with the 5 strategic priorities, however, the draft Strategy lacks an overall vision to address air pollution and to achieve clean air throughout the country. We suggest this vision should be based on the *right* to breathe clean air as a central guiding principle for Ireland's National Clean Air Strategy. Additionally, any policy affecting air quality should be developed with the acknowledgement that marginalised groups – like Travellers and Roma – are disproportionately affected by air pollution and have reduced resources to advocate for their right to clean air. This disproportionate impact air pollution has on Travellers and Roma needs to be matched with actions to remediate the current situation. Any proposed solutions to this impact should include Traveller and Roma voices. This can be achieved through meaningful engagement with local Traveller organisations, like Pavee Point.

The draft Strategy also lacks specificity as to *how* the five strategic priorities are to be achieved. There should be a shift from simply explaining air quality issues in Ireland, to what is needed for an effective and timely implementation of a Strategy that ensures the right to breathe clean air is delivered. It is our contention that the draft Strategy places an over-emphasis on explaining air quality issues in Ireland, when what is needed for effective and timely implementation is detailed steps that the Government, public bodies, and local authorities can take to ensure that the right to breathe clean air is delivered.

Finally, the priorities lack robust monitoring and accountability mechanisms. The Strategy should be revised to include clear monitoring and accountability commitments that are measurable, actionable, and time-bound. Furthermore, the Strategy must ensure that all individuals living in Ireland have access to legal remedies when Ireland's obligations in relation to air quality are not being fulfilled.

2. Do you feel there are additional strategic priorities which should be included?

Further research into how air pollution affects marginalised groups should be included in the Strategy. Furthermore, the Strategy should outline measures to identify how impacted communities - like Travellers and Roma - can be engaged on air quality issues, alongside appropriate support measures to ensure that action to address air quality is both inclusive and fair. This Strategy should also seek to align with other key EU strategies and policies, such as the EU framework for Roma Integration Strategies and the associated the National Traveller & Roma Inclusion Strategy.

3. How can pollutant emissions data be better used to inform actions at local and national levels?

Pavee Point would like to see pollutant emissions data which measures specific pollutants and their potential harm. In addition to existing approaches to measuring, more local air quality stations should be established and piloted in areas with a higher concentration of Traveller and Roma residents (e.g., next to Traveller-specific accommodation). More localised air quality monitoring, coupled with disaggregated emission data, could be used to mitigate against any further widening of health inequalities among Traveller and Roma Communities, and the general population.

⁵ [Accommodating Ethnicity: Addressing Energy Poverty among Travellers Living in Mobiles Homes and Trailers](#) (2019).

4. What do you feel are the most important current and emerging air quality issues in Ireland that require further research?

While air pollution affects everyone, vulnerable and marginalised communities in Ireland are disproportionately impacted. This is the position of Ireland's EPA, who have published work on the impact of the environment on health and wellbeing.⁶ This Clean Air Strategy should therefore direct the Department of Environment, Climate and Communications to commission research to examine the specific ways in which air pollution impacts Travellers and Roma. Special attention should be paid to the siting of landfill sites, access to green space, traffic congestion, measures to address energy poverty, and the differing types of accommodation Travellers reside in.

5. How can we better increase awareness of the health impacts of air pollution?

Awareness could be raised by linking in with other health and well-being strategies. Both mainstream and targeted communication strategies should be utilised to ensure equitable access to information for all groups. For example, Traveller organisations could support the dissemination of key messaging to Travellers nation-wide. Communication campaigns should recognise the wider context of historically large polluters (e.g. industry, agriculture, transport, etc.) while also acknowledging the power of individual behaviour changes (e.g., car-dependency, food-waste, etc.).

This campaign could include extensive social media engagement and a TV or radio campaign. The EPA's [air quality website](#) should also be reviewed and updated to make its interface more-user friendly and accessible to a wider range of users. Further explanatory information and transparency should be provided, for example in relation to the classification and functions of Ireland's monitoring stations.

6. What issues might a national clean air awareness campaign encompass and how could its impact be measured?

The campaign should highlight the health impacts of air pollutants from both the residential heating and transport, particularly fine particulate matter and nitrogen dioxide which are regarded as the most harmful and prevalent air pollutants to which individuals are exposed.

An awareness campaign should also encompass the impact of private motor vehicle usage upon ambient air quality and call on individuals to limit their car usage where possible, reduce driving speeds and avoid idling vehicles when stationary.

7. What particular metrics or benchmarks do you think should be considered in tracking the progress of a Clean Air Strategy?

Pavee Point believes that Ireland's Clean Air Strategy needs to adopt WHO guidelines as legally binding targets by the end of 2022 at the latest. The EU has set out commitments to move towards the adoption of WHO standards through the revision of the Ambient Air Quality Directives, in recognition of the fact that the EU's current air quality standards are insufficient. It is estimated that poor air quality caused 400,000 premature deaths across Europe in 2016.⁷ As part of the European Green Deal, the European Commission has adopted a zero-pollution action plan for air, soil and water

⁶ [Environmental Protection Agency Ireland. Environment and Wellbeing.](#)

⁷ [Cutting air pollution in Europe would prevent early deaths, improve productivity and curb climate change — European Environment Agency \(europa.eu\).](#)

which includes an interim 2030 target to reduce the number of premature deaths caused by air pollution by 55% by improving air quality.⁸

The Environmental Protection Agency (EPA) has noted that Ireland's overall ambient air quality compares favourably to many other European countries but highlights localised air quality issues throughout the country, particularly on cold winter evenings. Indeed, approximately 1,300 deaths occur annually in Ireland because of poor air quality, mainly from fine particulate matter.⁹ The draft Strategy points to concerning levels of nitrogen dioxide and particulate matter at certain locations around the country, further underscoring the imperative to tackle air pollution swiftly and effectively. Pavee Point therefore recommends that the Strategy should be a statutory one and adopt WHO air quality standards by the end of 2022 and that these should be legally binding limit values. This would also ensure Ireland's compliance with revised EU legislation. Pavee Point believes that this is an invaluable opportunity for Ireland to be an environmental and climate leader amongst EU member states by being an early adopter of the more robust WHO standards, and embed a human rights approach to regulation that is in line with Public Sector Duties, especially with respect to local authorities who have responsibility for Traveller accommodation.

8. Are there any other comments you have in relation to the draft national Clean Air Strategy

Many new measures referenced in the strategy will not apply to a significant portion of Traveller and Roma families:

- Largely, Travellers will not be eligible for the range of grant schemes that have been introduced in parallel with the BER system.
- Travellers are still dependent on the burning of fossil fuels for heat and as outlined above, they experience significant levels of energy poverty. This is especially true for Travellers living in trailers.
- The National Retrofit Plan only refers to houses, it will not be relevant to Travellers living in trailers. Retrofitting and upgrading trailers is particularly salient in light of how energy inefficient they can be currently.
- Current policies and structures make it difficult, if not impossible, for Travellers and Roma to switch to using low-emission mobility. For example, Traveller-specific accommodation is typically located outside of city centres, near high-speed national roads where there is a lack of public transport links, as well as walking and cycling infrastructure. This leaves many car-dependent, with electric vehicles priced outside of what they can afford.

⁸ [Zero pollution action plan \(europa.eu\).](https://ec.europa.eu/eip/eip-action-plan/)

⁹ [European Environment Agency \(2018\) Unequal exposure and unequal impacts: social vulnerability to air pollution, noise and extreme temperatures in Europe.](https://www.eea.europa.eu/en/press/2018/04/04)