

Senedd Cymru | Welsh Parliament

[Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith](#) | [Climate Change, Environment, and Infrastructure Committee](#)

[Bil yr Amgylchedd \(Ansawdd Aer a Seinweddau\) \(Cymru\) | The Environment \(Air Quality and Soundscapes\) \(Wales\) Bill](#)

Ymateb gan Cymdeithas y Diwydiant Stofiau | Evidence from Stove Industry Association

General principles

What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

The Stove Industry Association (SIA) is supportive of the general principles of the Bill and of the setting of and reporting on air quality targets. Pragmatic legislation that supports consumer choice and well-being, is in line with carbon reduction and sustainability, and that promotes best practice for domestic burning is supported by the SIA.

What are your views on the Bill's provisions (set out according to sections below), in particular are they workable and will they deliver the stated policy intention?

National air quality targets (sections 1 to 7)

The SIA supports the provisions set out in sections 1 to 7 and believes that these represent a workable framework for delivery. However, there is currently a lack of specific dates or timeframes set out in the Bill.

Promoting awareness about air pollution (section 8)

The SIA agrees that steps must be taken by Welsh Ministers to raise awareness of air pollution risks and how to reduce air pollution

National air quality strategy (sections 9 to 11)

Section 10 – Consultation on review of strategy does not currently reference industry. The SIA represents over 100 members – manufacturers, distributors and retailers of solid fuel burning appliances, fuel and chimney/flue systems, as well as the sweep associations, competent persons schemes and testing bodies. Approximately 80% of UK wide solid fuel appliance sales are from SIA members. We would therefore urge consultation with industry in the areas of strategy review and implementation (Section 10) and can offer a wealth of information, including research, in the area of domestic burning best practice.

Air quality regulations (section 12)

As above – no current provision made for consultation with industry. This should be factored in.

Local air quality management (sections 13 to 15)

The SIA is supportive of the provisions set out under sections 13 to 15 and would welcome the opportunity to support local authorities with information for the development of action plans referencing indoor domestic combustion.

Local authorities must be encouraged to understand and be able to explain to residents the different types of domestic burning. There is a significant difference between an Ecodesign stove that has been tested for use in a Smoke Control Area, that provides low carbon heat to the local space where the user needs it, and burning solid fuel in an open fire, in a firepit in the garden or the inefficient incineration of garden waste in bonfires. The latter three types of burning have no controlled combustion and release higher levels of all emissions than the controlled combustion achieved in a modern, closed fronted Ecodesign compliant stove. Encouraging the replacement of open fires and older stove appliances with Ecodesign stoves, such as clearSkies certified models, would dramatically reduce emissions from indoor solid fuel burning as Ecodesign stoves produce up to 90% less emissions than an open fire and up to 80% less than many older, basic stove models.

Local authorities should consider the deprecation of burning outdoors e.g. in bonfires, firepits and chimineas. Raising awareness with the public that reducing the use of these outdoor burning practices will have a dramatic effect in improving local air quality. Encouraging the use of garden waste collection would also reduce waste burning and promote circularity as the waste could be utilised as compost or to feed anaerobic digestion plant.

Local authorities should promote the replacement of open fires and old technology with newer technology. Encouraging the replacement of open fires and older stove appliances with Ecodesign stoves, such as clearSkies certified models, would dramatically reduce emissions from indoor solid fuel burning as Ecodesign stoves produce up to 90% less emissions than an open fire and up to 80% less than many older, basic stove models. Replacement will also serve to reduce overall wood fuel consumption as efficient modern stoves, require less fuel to produce the same amount of heat whilst still allowing consumer choice in the way they heat their home with a cost effective, low carbon heating solution. The Norwegian Municipality of Bergen identified that in parts of the town, burning solid fuels on old technology was a contributing factor in elevated PM concentrations; they financially incentivised and supported the replacement with newer technology and after two years PM levels were deemed acceptable. The cost of this was relatively modest.

Best practice communication should be part of ongoing local authority communication with local residents. Local authorities should ensure that the relevant pages of their websites are up to date with information on solid fuel burning best practice, including the importance of correct appliance (with clearSkies certification recommendation as the benchmark) installation, correct fuel, correct use and correct maintenance, including chimney sweeping and inspection. The SIA has a wealth of information available to support this and works closely with the Federation of British Chimney Sweeps (a Stakeholder Member of the SIA) and other key industry stakeholders.

Smoke control (sections 16 to 18)

The SIA has long supported the enforcement of Smoke Control Areas and the use of authorised fuels. Appliance certification schemes, such as the clearSkies Mark scheme which identifies appliances that meet SCA exemption requirements (as well as all certified models being certified as Ecodesign compliant) are imperative here. As are fuel schemes such as Ready to Burn, alongside best practice guidance on chimney sweeping and ongoing maintenance. The SIA suggests that burning Ready to

Burn certified fuel on a CE or UKCA marked appliance that is Defra exempted for use in a SCA should be a suitable proof of compliance for the homeowner.

Local authorities should be informed of these schemes when exercising their functions relating to enforcement of SCAs and the SIA has a range of information to assist.

Vehicle emissions (sections 19 to 21)

No comment

National soundscapes strategy (sections 22 and 23)

No comment

Strategic noise map and noise action plans (sections 24)

No comment

General provisions (sections 25 to 28);

No comment

What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

No comment

How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?

No comment

Are any unintended consequences likely to arise from the Bill?

We support the use of modern technology as best practice and would encourage the avoidance of unilateral "backdoor" bans on certain technologies. A modern wood burning stove (e.g. a clearSkies certified model) produces up to 90% less emissions than an open fire, whilst using up to 75% less fuel to provide the same amount of heat. Ecodesign compliant stoves are generationally advanced and have multistage combustion, sealed combustion boxes and are highly efficient (up to 85% thermally efficient) low carbon heaters. The advantages of having a grid-independent appliance are numerous but include the ability to just heat the space you are in and to give the security that the homeowner can heat their home in the event of grid outages or network capacity issues. We would encourage the introduction of Smoke Control Areas and their enforcement, as well as the introduction of regulations relating to the type of fuels that can be sold. We suggest that local air quality planning should seek to preserve or enhance local air quality as far as reasonably possible by using best available technology whilst preserving consumer choice.

What are your views on the Welsh Government's assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?

No comment

Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum or any related matters?

It makes sense to allow action locally, but it should be noted that a large amount of particulate matter comes from natural sources or from overseas and is therefore truly transboundary. Actions should be considered only upon the basis of fact and not hearsay; domestic combustion as a category of emissions is commonly interpreted as meaning “wood burning stoves” - this is simplistic and highly misleading. Only a very small percentage (2.6%) of total domestic combustion PM2.5 emissions come from burning solid fuel in a modern, Ecodesign compliant woodburning stoves, and when looking specifically at dry wood burnt in Ecodesign stoves the figure drops to 0.3%. Burning solid fuel on open fires accounts for much higher levels (48.53% of the domestic combustion total), older stoves 40.31%, and outdoor burning of charcoal and coal on garden BBQs and firepits, 3.36% as evidenced in the NAEI (Source:

https://naei.beis.gov.uk/resources/PivotTableViewer_2023_AQ_Final_v1.xlsx) . Other UK sources such small scale waste incineration, like garden firepits and BBQs, account for large levels of emissions whilst serving no positive outcome in terms of usable heat or circularity.