Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from Charlton & Jenrick Ltd,

Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution?

No - in respect of domestic wood and solid fuel burning.

1. Open fires and old stoves burning wood should be pro-actively replaced using incentive or compulsion with new clean burning stoves - SIA certified Ecodesign Ready stoves. Ecodesign Ready stoves reduce particulate and unburned fuel emissions by up to 90% over an open fire. It is estimated that nearly 60% of wood is burnt on open fires by the DECC Domestic Wood Usage Survey. Open fires are the worst available technology in respect of both air quality and thermal efficiency for burning wood in a domestic situation and should be phased out altogether.

2. Bituminous house coals produce exceptionally dirty emissions and should be phased out rapidly and completely, to be replaced by manufactured smokeless fuel products only.

How does the Scottish policy fit with the UK and EU policy on air quality?

Ecodesign is the EU Directive designed to increase heating appliance efficiency and reduce emissions (PM, CO, CO2, NOx and OGC). It is due to come into force for room heating solid fuel appliances on 1st January 2022. DEFRA has gone on record to say that it will use Ecodesign to reduce emissions from solid fuel heating appliances.\(^\text{1}\).

The Stove Industry Alliance (SIA)\(^\text{2}\) has been working closely with DEFRA to introduce stoves that will meet the Ecodesign regulations ahead of the implementation date. The stoves are being called Ecodesign Ready and they were officially launched on 28th February in Westminster at a reception hosted by Neil Parish MP, Chair of the Select Committee on Food and Rural Affairs. There are already over 200 models available. The stoves have been launched 5 years before the regulations become law. Furthermore, from 2020 the main manufacturers in the SIA have also committed to only manufacture new stove models that will satisfy Ecodesign.

Independent testing by Kiwa, the main UK test laboratory for solid fuel appliances, has shown that Ecodesign Ready stoves can reduce particulate emissions (PM) by

\(^{1}\) DEFRA: Draft plans to improve air quality in the UK, September 2015
\(^{2}\) The Stove Industry Alliance (SIA) is the trade body representing the majority of stove manufacturers and distributors in the UK, wood suppliers & allied companies. It was formed in 2008 to promote the benefits of wood-burning stoves.
90% compared to an open fire and 80% compared to a stove manufactured ten years ago.

Good stoves need good quality fuel so a new HETAS Woodsure wood fuel quality scheme has been set up with the support of DEFRA to ensure that wood sold as ready to burn is in fact of the right moisture content and quality for just that purpose. If backed and promoted vigorously by government, this will ensure that consumers can always access the right quality wood fuel for their new Ecodesign stoves.

Therefore Scotland should show leadership by implementing a programme of only installing new stoves that are Ecodesign ready and replace the old stock of appliances and open fires with new Ecodesign stoves.

**Are the policies sufficiently ambitious?**

No – as above they should be structured to rapidly phase out old appliances and open fires and bring in new solid fuel appliances to Ecodesign standards. Improve wood supply quality and rapidly phase out bituminous house coals.

**Are the powers and resources of Local Authorities and SEPA to address air pollution adequate?**

**Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?**

No. An incentive based or compulsory replacement scheme should be brought in to speed up replacements of open fires and old domestic stoves with new Ecodesign ready units. Use of bituminous house coals in all appliances or open fires should be prohibited.

**Is Scotland on target to have a pilot low emission zone (LEZ) in place by 2018 and should there be more than one LEZ pilot?**

**How should the improvement of air quality be prioritised in areas where there have been persistent breaches of NO₂ limit values?**

**Is adequate consideration given to air pollution from agriculture?**
Are there conflicts in policies or barriers to successful delivery of the air quality objectives?

Yes – nothing is being done about upgrading domestic wood burning appliances to the latest standards and eliminating use of polluting open fires. Nothing is being done about phasing out polluting bituminous house coals either. Both of these issues need immediate action to correct.