

## WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

<b>Title of proposal:</b>	<b>Provisions within the Clean Air (Wales) Bill</b>
<b>Official(s) completing the Integrated Impact Assessment (name(s) and name of team):</b>	<b>Calum Shaw John Griffiths Air Quality Branch</b>
<b>Department:</b>	<b>ESNR</b>
<b>Head of Division/SRO (name):</b>	<b>Olwen Spiller</b>
<b>Cabinet Secretary/Minister responsible:</b>	<b>Lesley Griffiths, Minister for Environment, Energy and Rural Affairs</b>
<b>Start Date:</b>	<b>19/11/2020</b>

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## HOW TO COMPLETE THE INTEGRATED IMPACT ASSESSMENT

This template should be used to summarise the main impacts of the proposal. In completing it, you should consider how the proposal:

- fits with the priorities and vision of *Prosperity for All*;
- can contribute to the social, cultural, economic and environmental well-being of Wales; and
- might affect Wales and the people who live here, positively or negatively.

### Full Impact Assessments

To conduct the Integrated Impact Assessment (IIA), you will need to use some, but not necessarily all, of the full impact assessments listed below and annexed at the back of this template. The Integrated Impact Assessment will guide you to the relevant full impact assessments you need to do.

Annex	Full Impact Assessment
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B	Error! Reference source not found.
C	Error! Reference source not found.
D	Error! Reference source not found.
E	Error! Reference source not found.
F	Error! Reference source not found.
See Intranet	Justice System Impact Identification

For other assessments which do not have an assessment template provided here (for example Health Impact Assessment and Strategic Environmental Impact Assessment), please see the accompanying guidance to this Integrated Impact Assessment for further information.

## SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

(Please note that this Section will be published)

**In narrative form, please describe the issue and the action proposed by the Welsh Government. How have you applied / will you apply the five ways of working in the Well-being of Future Generations (Wales) Act 2015 to the proposed action, throughout the policy and delivery cycle?**

### AIMS

The collective aim of the proposals within the Clean Air Bill for Wales is to strengthen the existing legislative framework governing the management and regulation of air quality in Wales.

The Bill supports the First Minister's Manifesto commitment to reduce the burden of poor air quality on human health, our economy, biodiversity and the natural environment. When enacted, this legislation will support wider actions to address the Climate emergency and support environmental growth.

The Bill proposals are described in the Clean Air Plan for Wales which was published in August 2020.

To secure necessary improvements in air quality, all parts of society have a role to play, through changes in behaviours at home, when travelling, at work and at leisure. The impacts and benefits fall across all sectors.

We will enhance both local and national government's ability to tackle poor air quality. The strategic proposals within the Bill are as follows:

- the introduction of an air quality target setting framework with a requirement for Welsh Ministers to set one or more air pollutant targets, including for fine particulate matter in ambient air concentrations, in secondary legislation by regulation. The regulations setting the targets for at least fine particulate matter must be laid within 24 months of enacting the Bill. The targets must be reviewed periodically and the Welsh Government proposes that reviews occur at least every 5 years. The Welsh Government proposes targets are only amended by Welsh Ministers if the independent and expert advice on targets changes or in exceptional circumstances (such as where the benefits are no longer proportionate to the costs). Welsh Ministers will publish a statement before the Senedd to report whether the targets have been met by the specified date. If the targets are not met within 12 months of publishing the statement, Welsh Ministers must explain in another statement why the targets have not been met and the action(s) the Welsh Ministers (or an appropriate authority if such an authority is delegated by the Welsh Ministers) will be taking to ensure the targets are met as soon as reasonably practicable. In the case targets are unmet, the Welsh Ministers must obtain independent and expert advice within 8 months of publishing the statement of non-compliance. The aim therefore is to create a Target Setting Framework for setting evidence-based air quality targets in the future, with a specific requirement to set a target for PM<sub>2.5</sub> to reduce concentrations across Wales to below the WHO guideline where it is possible, and lower still where there is sufficient potential and there is high public exposure or risk to sensitive groups.
- a requirement for a Clean Air Plan or Strategy to be published and then reviewed every 5 years. It is important for Welsh Ministers to be able to set their own timescales for both publishing and

reviewing the Clean Air Plan for Wales. This is of key importance as the Clean Air Plan for Wales will, over time, need to be updated and amended to reflect both changing and continuing priorities for tackling air pollution and protecting human health including the wider environment. The Clean Air Plan for Wales is a means of arranging a set of policies and ambitions for improving air quality in a systematic way to aid and facilitate delivery. The Clean Air Plan for Wales sets out the Welsh Government's plan for dealing with all sources of air pollution, making our air healthier to breathe, protecting nature and boosting the economy.

- new powers for smoke control linked to tackling air pollution from domestic burning (PM2.5). Specific proposals include the adoption of a civil enforcement regime in place of the criminal regime for Smoke Control Areas (where it is an offence to emit smoke from a chimney of a building unless an authorised fuel is used or an exempted class of fireplace); mandating the application of Smoke Control Orders in all urban areas which meet certain criteria (to be specified within the Bill); introduce a requirement on local authorities to review Smoke Control Areas on a regular basis in terms of instituting or rescinding a Smoke Control Order; and include outdoor combustion within Smoke Control Areas (for example, bonfires).
- a fit for purpose legislative and regulatory air quality management framework. The proposed legislative changes seek to enable local authorities to take preventative action by requiring proactive monitoring strategies and achieving compliance as soon as possible in Air Quality Management Areas. The legislation will introduce a 'partners' concept to provide support for local authorities in developing and implementing solutions collaboratively with other organisations. An organisation designated as a 'partner' will not, under the legislation, be able to reasonably refuse to engage with a local authority in developing effective actions to improve air quality, unless it can justify this with suitable evidence. Part IV of the Environment Act 1995 provides the framework for Local Air Quality Management and the proposal is to update the legislation to ensure it reflects the principles (and ways of working) set out in the Well-Being of Future Generations (Wales) Act 2015. The aim is to create a regime which is proactive, preventative and health-focussed. Proposals within the Bill will specifically include a clear requirement for local authorities to provide a projected compliance date for all Air Quality Management Areas following the production and appraisal of Air Quality Action Plans with compliance dates agreed with Welsh Ministers. The existing legislation on Air Quality Action Plans will be clarified to ensure they set out actions and associated timescales to secure the achievement and long-term maintenance of air quality standards and objectives with local authorities being required to review Action Plans at least once every 5 years.
- strengthened powers to address vehicle idling. The Clean Air Plan sets out the commitment to further examine the evidence base for developing and implementing anti-idling measures, particularly in terms of the complex links between emissions and exposure. The proposed legislative changes aim to strengthen the existing legislative framework governing anti-idling through the provision of anti-idling guidance, including the power to increase amounts of fixed penalty for idling.
- consolidated powers to implement Clean Air Zones and/ or Low Emission Zones. The Clean Air Plan for Wales sets out the expectation that we will see Clean Air Zones established in towns or cities throughout Wales to reduce the impact of transport emissions on health and that this may be supported by a charging element. The Bill proposes to introduce Clean Air Zones or Low Emission

Zones in Wales where there is a case for establishing them to support air quality improvement. A Clean Air Zone may be described as “an area where targeted action is taken to improve air quality, in particular by discouraging the most polluting vehicles”. To discourage the most polluting vehicles, the Bill provides for the possible application of a charge on designated roads where stipulated emission standards for particular vehicle categories are not met. The charge may vary across a range of vehicle categories. The proposed legislative provisions would ensure the Welsh Government and local authorities have powers to introduce a charging scheme on those roads for which they are the relevant traffic authority. The Bill proposes to commence relevant provisions within the Transport Act 2000 to enable local authorities (either by themselves or in regional partnerships with neighbouring local authorities) to fully implement charging schemes; create a new standalone charging regime for trunk roads including a regulation-making power for Welsh Ministers; and to broaden the current limitations on net proceeds from road pricing on trunk roads to be invested in local transport schemes only.

- a duty on public bodies to adhere to guidance encouraging different ways of working and actions to reduce air pollution and support decarbonisation. The Clean Air Plan sets out a commitment to produce, by 2022, inter-sectoral guidance to empower workforces across Wales to tackle air pollution. The Welsh Government is keen to ensure that the guidance will deliver air quality, health and decarbonisation benefits simultaneously. The intention is to include a clause in the Bill placing the guidance on a statutory footing so that it applies to the public sector (NHS Wales; Natural Resources Wales; local authorities), including the private and the voluntary sector; to make it a statutory duty for stakeholders from the public, private and voluntary sectors to report on progress (every 6 months) and to be accountable for their actions/responsibilities to the Welsh Government. The Air Quality in Wales website could be used as a reporting mechanism for the public, private and voluntary sectors

## CONTEXT

Clean air is essential for life, health, the environment and the economy. Air pollution is a result of the way we currently generate power, heat our homes, produce food, manufacture goods and power transport. We need to encourage and support innovation and uptake of cleaner technologies, whilst also recognising that changes in behaviour contribute to tackling the pollution that claims lives.

Air pollution is a local, regional, national and international problem caused by the emission of pollutants which, either directly or through chemical reactions in the atmosphere, lead to negative impacts on human health, ecosystems and the economy.

The Minister for Environment, Energy and Rural Affairs declared a Climate Emergency in April 2019. The Clean Air Plan contributes to addressing the challenges faced, alongside other strategies and plans for decarbonisation, agriculture and the natural environment.

### Long term

- ♦ *What long term trends, challenges and opportunities might affect the proposal?*

The issue of air pollution is a global phenomenon and by its very nature cannot be addressed by one nation - as a result, climate change and actions by other governments will affect this proposal. The proposals for the Clean Air Bill represent things that Wales can address as part of its global responsibilities.

For example, overall concentrations of PM<sub>2.5</sub> in most of Wales are low (with an estimated population weighted mean concentration (PWMC) of 6.0 µg/m<sup>3</sup> in 2016). However, contributions from combustion engine vehicles, non-exhaust road transport emissions, domestic and industrial emissions, contribute to the local peaks in urban areas. The contribution of domestic wood burning to PM<sub>2.5</sub> concentrations makes a significant contribution along the north coast and in urban areas, including for the large urban populations in Swansea and Cardiff. These are emissions in hotspots in industrial and densely populated urban areas which local authorities have powers to control. To drive the action needed to achieve cleaner air and reduce the impacts of air pollution in Wales it is important we are able to set the right targets.

Setting an air quality target framework for Wales needs to be a common effort by all stakeholders (such as power generation sector, domestic sector, food sector, manufacturing sector and the transport sector). In order to reduce emissions, stakeholders may have to change or reduce the way they use materials (i.e. wood stoves) or how they produce goods. Some stakeholders may experience extra costs associated with complying with any future set targets that will be sector specific and area specific (localised concentration levels). The target setting framework shall identify areas that Wales can address as part of its global responsibilities and for cleaner air for its citizens.

- ♦ *How does the proposal prevent / mitigate the bad effects in these trends or facilitate / make the most of the good effects?*

The Clean Air Bill proposals form an interrelated framework of actions which will establish and deliver against **long-term targets** to achieve the progressive reduction of emissions and pollutants in the air.

### Prevention

- ♦ *How does the proposal support the breaking of negative cycles such as poverty, poor health, environmental damage and loss of biodiversity*

Taking **preventative** action to reduce the impacts of air pollution on public health and the natural environment and developing successful early actions whilst devising long term solutions will benefit wider society.

The Clean Air Bill proposals are specifically intended to reduce and mitigate risks to health and to promote ways of working and travelling that support and enhance the environment.

- ♦ *Does the proposal treat a symptom or the underlying cause? If so how? If it treats a symptom, what can be done about the underlying cause?*

The Clean Air Bill proposals aim to address the underlying causes of air pollution and where this is not possible, to mitigate the effects.

- ♦ *How could the proposal minimise its own negative impacts e.g. minimising waste and resource use, emissions and impact on air quality, negative impact on social / community cohesion?*

The Clean Air Bill proposals aim to deliver impacts that are largely positive. The likely negative consequences of the Bill proposals are financial, as there are significant costs associated with some of the proposed activities.

The Bill proposes actions (especially in relation to the guidance on empowering workforces to tackle air pollution) that prompt consideration of changes in individual and collective thinking and behaviour; these may be received sceptically initially, but over time may contribute to improved well-being and greater opportunities to act as communities of interest.

### Integration

- ♦ *How could this proposal connect and contribute to different public policy agendas and generate multiple benefits e.g. how can a transport project support improvements in health, culture or worklessness?*

The Bill proposals have been developed in collaboration with internal and external stakeholders and groups, including Public Health Wales, Healthy Air Cymru, the Wales Air Quality Forum, Natural Resources Wales and Transport for Wales.

The Bill proposals have been designed to reflect the sustainable development principle through focussing on actions that result in improving air quality and reducing the harmful effects of air pollution on citizens and the environment.

The proposals have been developed through formative dialogue with key stakeholders across Government. Before the end of the current Senedd term, the Welsh Government will be launching a White Paper consultation on the Bill proposals.

The Bill proposals will improve the integration of air quality management processes through better working practices within and between public sector bodies (such as in relation to the Local Air Quality Management



Framework) and will create opportunities for inter-sectoral collaboration to support air quality improvement.

- ♦ *What practical steps have you taken to integrate your proposal with Prosperity for All - our National Strategy, well-being objectives and plans, as well as those of other public bodies and Public Service Boards, to maximise the proposal's contribution across the seven well-being goals?*

Prosperity for All – the National Strategy commits us to building healthier communities and better environments. Clean air has a central role in creating the right conditions for better health, well-being and greater physical activity in Wales. The White Paper on the Clean Air (Wales) Bill has been developed to support delivery of the commitment to reducing emissions and delivering vital improvements in air quality through regulation and guidance to encourage and promote the tackling of air pollution across all sectors.

## **Collaboration**

- ♦ *Who are the partners that have a shared interest in this proposal?*

Partners in the proposal include relevant departments within Welsh Government; Local Authorities in Wales; Non-Governmental Organisations; Public Health Wales; Natural Resources Wales; Transport for Wales; including the voluntary and private sectors. Collaboration aims to ensure actions are implemented and well-being objectives are met.

- ♦ *How have those partners been involved in developing the proposal and planning its delivery, and what contribution will they make to it?*

These partners have either contributed to the development of the proposals or will contribute to the delivery of actions which meet the Bill's ambitions.

The Welsh Government will be consulting on the White Paper on the Bill proposals before the end of the current Senedd term.

## **Involvement**

- ♦ *How have people affected by the proposal been involved in developing it?*

Stakeholders were invited to participate in the Clean Air Plan workshops held in early 2020. The proposals for the Bill feature within the latest Clean Air Plan. The Welsh Government will be consulting on the White Paper on the Bill proposals before the end of the current Senedd term.

- ♦ *What matters to the people affected by the proposal and how might they be involved in its delivery?*

Stakeholders will be able to participate in the consultation on the White Paper on the Bill proposals. The White Paper consultation will take place before the end of the current Senedd term.

*In addition to the five ways of working above, consider the following areas:*

## **Impact**

- ♦ *What are the main arguments for and against the proposal? Please refer to evidence; acknowledge significant gaps in our knowledge and describe any plans to fill them.*

There is a significant body of research from Welsh, UK and international sources that makes clear the relationship between airborne pollution, health and mortality. In addition, we have substantial evidence of the need to tackle airborne pollution from agricultural, commercial, domestic, industrial and transport sources. Welsh Government has devolved responsibility to address airborne pollution and legal commitments to ensure that domestic and international targets are met.

*How widely have you explored these arguments through involvement and collaboration?*

The need for action and the contents of the Bill have been developed in close collaboration with a range of stakeholders, including Public Health Wales, Healthy Air Cymru and the Wales Air Quality Forum.

## **Costs and Savings**

### **What will the proposals cost and how will they be funded?**

The costs of setting up and implementing the Target Setting Framework are expected to be administrative costs paid for by the Welsh government. At this time, it is unknown what the value of this will be.

When Targets for improvements to air quality are set under the Framework it is likely that actions will be required by different sectors to achieve the necessary improvements.

Measures to support air quality improvement are likely to be costly and will need to be sustained over a period of possibly up to 20 years to support current and future generations.

Approximately £350k is required for future evidence necessary to support the ambitions in the Clean Air Plan, including understanding how and by when compliance with a new statutory target for fine particulate matter can be achieved. We are working in partnership with Natural Resources Wales, Local Authorities, Public Health Wales and other partners to design a framework for enhanced air quality monitoring, modelling, assessment and evaluation. Equipment and on-going running costs are subject to the outcome of the review.

The annualised cost to society across all sectors and Ministerial portfolios in Wales for measures which achieve a notional Welsh share of the UK statutory air pollutant emission reduction targets for 2030 is estimated to be £10.5 million per annum. These are estimated costs and there is not sufficient information available to break down these costs to the individual sectors.

### **Estimating the health benefits by action**

Further research was commissioned by the Welsh Government to investigate how the impact by measures used in the emissions reduction study would translate to health benefits for the citizens in Wales. Using 2016 as a baseline year, a national assessment of £50.00 (PM<sub>2.5</sub>) and £6.30 (NO<sub>2</sub>)

per person per  $\mu\text{g}/\text{m}^3$  per year was derived from the UKIAM and used in the equation shown below:

$$\begin{array}{ccccc} \text{The resulting} & & \text{Population of} & & \text{Monetised} \\ \text{reduction in} & & \text{Wales (3.16m)} & & \text{benefit per} \\ \text{population weighted} & \times & & \times & \text{person per unit} \\ \text{mean concentration} & & & & \text{change in} \\ \text{of PM}_{2.5} \text{ or PM}_{10}, & & & & \text{concentration} \\ \text{averaged over the} & & & & \\ \text{Welsh population} & & & & \end{array}$$

The findings from this investigation suggest that the implementations of the most feasible list of measures would generate an estimated monetised health impact of £76 million (range £21 million to £230 million) from the associated reductions of  $\text{PM}_{2.5}$  and £15 million (range £1.5 million to £62 million) from the reductions of  $\text{NO}_2$ .

Similarly, this applies to the other Bill proposals, that is, the costs of implementation will be identified when the work of implementing the Bill's various provisions begins.

### Mechanism

- ♦ ***Is legislation proposed? If so you will probably need to complete a Regulatory Impact Assessment.***  
*You can use the output of this Integrated Impact Assessment to help you.*

The Bill will be subject to its own Integrated Impact Assessment which will include a Regulatory Impact Assessment.

## SECTION 2. WHAT WILL BE THE EFFECT ON SOCIAL WELL-BEING?

### 2.1 People and Communities

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal affect people and communities?**

*For example:*

- ♦ *Particular individuals, groups of people or communities*

The Clean Air Bill proposals will benefit all the people of, and visitors to, Wales.

There will be social benefits – for example, the social benefits of establishing a new pollution target setting framework includes health benefits, better quality of life and improved opportunities for outdoor recreational activities. There will be positive steps towards equality in Wales, especially if improvements in emissions (hence concentrations) occur in deprived areas. This could also lead to an improved sense of community. There will be positive impacts on health as a result of cleaner air facilitating the public participating in outdoor recreation activities.

*People living in, working in, or linked to particular places*

In addition to the above statement, the Clean Air Bill proposes continued action to tackle airborne pollution in and from workplaces (in relation to the provision concerning the guidance on empowering workforces to tackle air pollution). The provision will benefit the wider communities in which those workplaces are situated.

- ♦ *Consumers of a particular product or service*

Not relevant.

- ♦ *Workers, in general or in a specific sector, and the goal of promoting decent work (as per section 4 of the Well-being of Future Generations (Wales) Act 2015)*
  - The Clean Air Bill proposals will have economic impacts for businesses. For example, the abatement costs necessary to achieve the emission reductions will impact on a range of sectors such as energy, manufacturing and transport. However, effective action to improve air quality will help to generate a healthier workforce and improved productivity as the number of staffing hours lost to sick leave should reduce<sup>1</sup>. Additionally, there could be positive employment impacts as a result of additional work arising from the manufacture and installation of the abatement technologies. In terms of the guidance on empowering workforces to tackle air pollution, this will lead to healthier workplaces and

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<sup>1</sup> Ricardo (2014), "Valuing the impacts of Air Quality on productivity", available from [https://uk-air.defra.gov.uk/assets/documents/reports/cat19/1511251135\\_140610\\_Valuing\\_the\\_impacts\\_of\\_air\\_quality\\_on\\_productivity\\_Final\\_Report\\_3\\_0.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat19/1511251135_140610_Valuing_the_impacts_of_air_quality_on_productivity_Final_Report_3_0.pdf), last accessed on the 5<sup>th</sup> November 2020

workforces, including healthier communities more widely. The proposals will have positive impacts on biodiversity (for example, through the target setting framework) which will result in improved ecosystem functioning. This could also lead to a positive impact on tourism and other outdoor activities.

## 2.2 Children's Rights

Ministers are required to have due regard to the United Nations Convention on the Rights of the Child when exercising any of their functions.

In place of screening questions, **you should follow the appropriate flowchart** set out in the *Children's Rights Scheme* to determine whether a full Children's Rights Impact Assessment is required. **If you consider it is not required, you should give your reasons here. Otherwise, complete the Full Error! Reference source not found.** at annex A below.

## 2.3 Equality

The Equality Impact Assessment will support you to consider the impact of your proposal on people with protected characteristics.

**Completing the Error! Reference source not found. is mandatory.** The assessment is available at **annex B** below.

## 2.4 Rural Proofing

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact on rural individuals and communities?**

*For example:*

- ♦ Have you considered the specific needs of people living and working in sparsely populated areas?

The circumstances of those in sparsely populated areas have been taken into account. In early 2020, consultation events were held across Wales on the draft Clean Air Plan (which included the Clean Air Bill proposals) in order to facilitate engagement from rural communities. The responses to the consultation highlighted additional actions were required to protect people living in rural areas. Key issues raised were around infrastructure and accessibility of sustainable transport; and preventing rural communities from falling into fuel poverty as a result of any actions to tackle emissions from domestic burning. As a direct consequence of the consultation events, the membership of the Welsh Government's Domestic Combustion Task and Finish Group was expanded to include representatives of coal merchants' businesses who would be directly affected and who supply to rural areas. In addition, we are working closely with

Local Authorities, Transport for Wales and the Welsh Government Transport Department to ensure the Bill provisions take account of specific circumstances in rural areas.

The Target Setting Framework itself will not directly affect the needs of people living in sparsely populated areas but depending on the targets set some required actions may have an impact on these areas. When targets are being proposed it is anticipated that a consultation process is undertaken across Wales in order to facilitate engagement from rural communities.

When consultation took place for the formation of the Clean Air Plan fuel poverty in these areas was highlighted as a potential issue. Consequently, the membership of the Welsh Government's Domestic Combustion Task and Finish Group has been expanded to include representatives of coal merchants businesses that would be directly affected, and who supply to rural areas. It is proposed that this will be the case for the Target Setting Framework consultation exercise.

Another area that may need to be considered includes public transport provisions. If there are changes to promote the use cleaner fuelled vehicles this may need to be supported by ensuring adequate fuel filling stations located in more rural areas to service these vehicles. This will need to be considered for both public and private sector vehicles.

♦ *What will be the impact for people in geographic isolation?*

The circumstances of those in geographic isolation are similar to those in sparsely populated areas, and their unique circumstances will be borne in mind.

♦ *How will the proposal affect access to services for rural people?*

♦ The White Paper will not have a direct impact or effect on access to services for older people.

♦ *What will be the impact on older people? (Rural communities often have disproportionately ageing population.)*

The White Paper will not have a direct impact or effect on access to services for older people. The Bill proposals, should improve air quality which will directly benefit older people.

*What will be the impact on housing? (Rural communities often lack affordable housing.)*

As a result of changes brought about (for example, those proposals relating to domestic burning), there should be an improvement in the quality of housing. It is unlikely that a net effect would be to affect the quantity of affordable housing in rural communities.

♦ *What will be the impact on the Welsh language? (Some rural communities are predominantly Welsh speaking.)*

See Welsh Language Impact Assessment.

♦ *What will be the impact on in-work poverty and fuel poverty?*

There will be no direct impact on in-work poverty.

There are Clean Air Bill proposals which relate to domestic burning. There is a risk of an increase in fuel poverty, if the costs for fuel increase significantly. This will be mitigated through consultation with stakeholder representatives, and the design of appropriate measures.

- ♦ *What will be the impact on rural businesses? (These are often mainly micro and small businesses.)*

It is expected that there will be economic impacts for businesses - for example, the abatement costs necessary to achieve the emission reductions would impact a range of sectors such as energy, manufacturing and transport. Additionally, there could be positive employment impacts as a result of additional work arising from the manufacture and installation of the abatement technologies.

There is also a potential for restrictions and bans on certain types of solid fuel to adversely affect rural businesses, either as their primary or as a secondary source of income. Any impact would be mitigated by introducing a transition period in any legislation.

**If the impacts you have identified are significant enough to warrant a more detailed assessment then you should complete a full** Error! Reference source not found., **at annex C below.**

**Please explain your decision about whether or not to conduct a full rural proofing impact assessment.**

A full rural proofing impact assessment is included at Annex C.

## 2.5 Health

**2.5a How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact health determinants?**

Public Health Wales have provided all the necessary information.

The Bill is designed to improve air quality in Wales this should significantly improve the health of all Welsh people and in particular those in the most polluted areas where targeted action is expected to be most effective. A number of published studies have shown a high correlation between areas of high air pollution and economic deprivation,<sup>2,3</sup> where it can be reasoned that poor air quality restricts the growth of the local economy due to the low productivity of its work force. Therefore, the improvement in local air quality will have an impact on localised health with the spatial extent of the impact largely proportional to the spatial coverage area of the measures. The magnitude of the impact is also likely to be proportional to the level of economic deprivation as improvement in air quality is likely to have a greater impact on the most economically deprived regions.

Please consider:

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<sup>2</sup> Brunt, H et al (2016), 'Air pollution, deprivation and health: understanding relationships to add value to local air quality management policy and practice in Wales, UK', [available online]: [https://www.researchgate.net/publication/307979303\\_Air\\_pollution\\_deprivation\\_and\\_health\\_Understanding\\_relationships\\_to\\_add\\_value\\_to\\_local\\_air\\_quality\\_management\\_policy\\_and\\_practice\\_in\\_Wales\\_UK](https://www.researchgate.net/publication/307979303_Air_pollution_deprivation_and_health_Understanding_relationships_to_add_value_to_local_air_quality_management_policy_and_practice_in_Wales_UK), last accessed on the 13<sup>th</sup> October 2020.

<sup>3</sup> Fecht, D, et al (2014), 'Associations between air pollution and socioeconomic characteristics, ethnicity and age profile of neighbourhoods in England and the Netherlands', [available online] <https://www.camden.gov.uk/documents/20142/18676139/Jason+Strelitz+Appendix+20.pdf/cad3d506-7281-6abb-aa7f-c1155fa00f0b>, last accessed on the 13<sup>th</sup> October 2020.

♦ *Lifestyles*

It is expected that as air quality improves, with the associated impact on health and well-being, citizens will have greater opportunity to engage in sporting and recreational activities that will have an additional positive impact on physical and mental health. Some of the most polluting workplaces are likely to be targeted for improvements which should improve the health and wellbeing of workers and local communities near the establishments.

♦ *Social and community influences on health*

It is expected that the Clean Air Bill proposals will have an impact in terms of access to green space and an increase in outdoor activities. In the short term, improvements in air quality are likely to entice citizens to spend more time outdoors, this will be beneficial to citizens of all ages. Elderly citizens with known health conditions might be enticed to engage in an appropriate level of physical and social activity if they are aware of potential benefits of breathing cleaner air. Many studies have shown that increased physical activity and social engagement can prolong and improve the quality of life for elderly citizens.<sup>4</sup>

♦ *Mental well-being*

Improvements in air quality have the potential to increase physical and recreational activity, with associated benefits to mental well-being. Improvements in air quality are likely to improve biodiversity, which can make outside spaces more appealing and in turn can improve society's mental wellbeing. These benefits are likely to be offset in the short term by the impact of new policies on those working in professions that are directly impacted by any proposed regulation. It is therefore important that businesses, especially SMEs are adequately supported by national government so that they are prepared and able to adjust to new regulations, this will help to reduce the level of stress experienced by those whose incomes are affected by the change.

♦ *Impact on Living/environmental conditions affecting health*

- The likely focus of any new regulation is to deliver improvements to the environmental and living conditions that affect health. Reduction of pollutants in the air will have beneficial effects on health conditions affected by the environment. Access to green space and increased opportunities for active travel options will encourage an increase in beneficial exercise and outdoor activities, and potentially result in reductions in transport related air pollution. Potential future policies to improve air quality may include financial support packages for building upgrades and cleaner vehicles. The inclusion of support packages for building upgrades are likely to target emissions stemming from the domestic properties which might be poorly insulated and therefore use more energy than energy efficient properties.

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<sup>4</sup> Bath, P & Deeg, D (2005), 'Social engagement and health outcomes among older people: introduction to a special section', [available online]: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5547666>, last accessed on the 13<sup>th</sup> October 2020.



Additionally, it is likely that a sizable proportion of the inhabitants of homes benefiting from a home upgrade package may suffer from fuel poverty. Therefore, residents suffering from fuel poverty will get better value for their energy costs which may help to improve their standard of living and health.

### *Economic conditions affecting health*

In the short to medium term, many small businesses may need to adjust to any proposed regulation targeting emissions which in turn may have an impact on the mental health of the affected parties. Looking more long-term, improving air quality in areas affected by industry producing air pollution will, as a consequence improve health conditions. Improved air quality will assist in reducing productive days lost due to ailments associated to air pollution.

#### ♦ *Access and quality of services*

Future policy may include commitments and intentions to support active transport initiatives and improvements to public transport. Reduced demand on NHS resources will enable re-focusing of medical service provision.

#### ♦ *Macroeconomic, environmental and sustainability factors*

Improving air quality will have a beneficial impact on environmental and sustainability factors. There will be a consequential impact on health and well-being.

### **2.5b. Could there be a differential health impact on particular groups?**

Please consider:

#### Age related groups

Poor air quality can adversely affect citizen health by exacerbating underlying health issues or causing new health issues. The Welsh Government have recognised that there are unique issues around children's exposure to air pollutants. Poor air quality can affect children's physical and cognitive development. Long-term health issues can prevent children from attending school, which can damage a child's future prospects. Long-term health issues can persist well into adulthood.

Air pollution also has an adverse effect on older people, in particular in terms of respiratory and cardiovascular diseases. Reducing air pollution will have a positive impact on the health of older people.

#### ♦ *Income related groups*

Evidence<sup>5</sup> indicates that those on the lowest incomes are more likely to be adversely affected by poor air quality. Actions to improve air quality outlined within the Plan will have beneficial health impacts on these groups in the long term.

- ♦ *Groups who suffer discrimination or other social disadvantage*

It is not anticipated that the Clean Air Bill proposals will have any impact on such groups.

- ♦ *Geographical groups*

The Clean Air Bill proposals will result in health benefits to workforces and the wider communities across Wales.

Any future policy or regulation put forward by the Welsh Government to reduce emissions of air pollutants will target major sources of the concerning pollutant. Some key points of emissions are known to stem from areas of heavy industry, which may also be a key component of the local economy. Therefore, citizens living in areas where a key polluter has a large influence on the local economy are likely to be impacted by any proposed requirements on the polluter. However, this impact will be offset by the long-term health and social benefits the resident will gain from the reduction of air pollutants within the air.

**If the impacts you have identified are significant enough to warrant it, you should conduct a more detailed health impact assessment.** There is further information in the guidance that accompanies this form. **Please explain your decision about whether or not to conduct a more detailed health impact assessment.**

There is an existing body of research from Welsh, UK and international sources that makes clear the relationship between airborne pollution, health and mortality.

## 2.6 Privacy

**Will the proposal involve processing information that could be used to identify individuals?**

No.

**If YES, then you must complete the** Error! Reference source not found. **at annex D below.**

N/A.

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<sup>5</sup> Fecht, D, et al (2014), 'Associations between air pollution and socioeconomic characteristics, ethnicity and age profile of neighbourhoods in England and the Netherlands', [available online] <https://www.camden.gov.uk/documents/20142/18676139/Jason+Strelitz+Appendix+20.pdf/cad3d506-7281-6abb-aa7f-c1155fa00f0b>, last accessed on the 13<sup>th</sup> October 2020.

## SECTION 3. WHAT WILL BE THE EFFECT ON CULTURAL WELL-BEING AND THE WELSH LANGUAGE?

### 3.1 Cultural Well-being

The Well-being of Future Generations (Wales) Act 2015's goal for culture is: 'A society that promotes and protects culture, heritage and the Welsh language and which encourages people to participate in the arts and sports and recreation'. Culture includes museums, archives, libraries and the arts; heritage includes the built historic environment as well as intangible heritage such as traditions; arts encompasses performance and creative sectors including music, literature, theatre and art, whilst sports and recreation include both elite and community sports as well as opportunities to participate in wider outdoor recreation.

#### 3.1a How can the proposal actively contribute to the goal to promote and protect culture and heritage and encourage people to participate in the arts sports and recreation? (for Welsh Language see section 3.2)

The Clean Air Bill proposals will have positive impacts on health as a result of cleaner air facilitating the public participation in outdoor recreational activities.

#### 3.1b Is it possible that the proposal might have a negative effect on the promotion and protection of culture and heritage, or the ability of people to participate in arts, sport and recreation? If so, what action can you take to avoid or reduce that effect (for example by providing alternative opportunities)?

No.

### 3.2 Welsh Language

**Completing the** Error! Reference source not found. **is mandatory.** The assessment is available at **annex E** below.

## SECTION 4. WHAT WILL BE THE EFFECT ON ECONOMIC WELL-BEING?

Supporting growth in the Welsh economy, and through this tackling poverty, is at the heart of *Taking Wales Forward*, the Welsh Government's Programme for Government.

### 4.1 Business, the general public and individuals

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact business and the public?**

*You need to make an overall assessment based on the best available evidence of monetary and non-monetary, short and long term costs and benefits. You should consider how businesses of different types and the public in general (individuals and households) will be affected. You should establish which groups or sectors will be disadvantaged and which will benefit. All costs and benefits should be considered over an appropriate time frame.*

*All public assistance provided to organisations involved in economic activity must comply with State Aid rules.*

**Positive (direct & indirect)** - a healthy workforce and clean environment would contribute to prosperity through a productive workforce and reduced social costs.

Positive employment impacts would also arise for those companies that manufacture and install abatement technologies in the UK.

#### **Negative (direct & indirect) –**

Abatement costs required to ensure the required reduction in air pollution would affect a wide range of sectors resulting in adverse employment, competition and SME impacts. Manufacture of coke and refined petroleum products, manufacture of basic metals and shipping (water transport) could be vulnerable due to the high abatement costs and/or level of competitiveness affecting their ability to pass additional abatement costs through to customers.

Previous research<sup>6</sup> into the cost of implementing new measures that will bring Wales into compliance with the EU National Emissions Ceiling Directive concluded that citizens working in most economic sectors within Wales will be largely unaffected by the measures suggested; however, the report suggests that 84% of citizens impacted in the *metals industry* will be impacted in some way with a slightly smaller number 6% impacted in both the *coke and refined petroleum* and *water transport* industries respectively.

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<sup>6</sup> Wood PLC, "Development of national multi pollutant measures database (MPMD) and abatement scenarios for devolved administrations – Wales", document provided by the Welsh Government.

The same report further concluded that any future measure to improve the energy efficiency of a domestic dwelling is likely to have a positive impact for both the home occupant and the businesses delivering the improvements. In theory other measures likely to be proposed in the future will drive necessary change in businesses with a sizable contribution to air pollution (as well as a large carbon footprint) are forced to adapt to become a business that is both financial and environmentally sustainable in the long-term.

#### **4.2 Public Sector including local government and other public bodies**

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact the public sector?**

*You need to make an overall assessment based on the best available evidence of monetary and non-monetary, short and long term costs and benefits. You should consider how different types of public sector bodies will be affected. All costs and benefits should be considered over an appropriate time frame.*

The Clean Air Bill proposals will impact on local authorities. For example, there will be resource implications for Local Authorities in relation to an improved regime for the Local Air Quality Management framework and for the management and enforcement of smoke control and associated abatement actions. Other proposals which will affect local authorities include proposals in relation to anti-idling; the guidance empowering workforces to tackle air pollution; and the power to enable them to implement charging schemes for the roads for which they have responsibility.

Public authorities are likely to benefit in the long term from the reduction of emissions containing offensive pollutants, however, this will depend on the regulation/policy proposed and how the message is delivered to Welsh citizens. Welsh citizens are likely to welcome the prospect of cleaner air but might not fully understand how currently levels of emissions are impacting Welsh society and may therefore not agree with any proposed restrictions, leading to different views between governing bodies and private citizens. Other public bodies such as the national health service and associated parties will benefit citizens breathing cleaner air as costs and services associated to respiratory disease and other medical concerns associated with poor air quality will reduce. An investigation into how Wales could meet the EU National Emissions Ceiling Directive (NECD)<sup>7</sup> suggests that the introduction of a series of measures will lead to sizable savings in the public health system.

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<sup>7</sup> Apsimon, H et al (2019), 'Assessing the effect of emission reduction measures on air quality in Wales', Centre for Environmental Policy: Imperial College London, document provided by the Welsh Government via email.

### 4.3 Third Sector

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal impact third sector organisations and what they do?**

*For example:*

- ♦ *What contribution are third sector organisations already making to achieving the aims of the proposal? What role will they play in future as a result of the proposal?*

Third sector representative bodies such as Plantlife and Healthy Air Cymru will continue to be consulted in developing the Clean Air Bill proposals.

- ♦ *Do third sector organisations already receive public funding for this or similar work?*

A number of third sector organisations are in receipt of public funding in relation to this area of concern, for example, Global Action Plan, for delivery of Clean Air Day.

- ♦ *Will the proposal impact on people already receiving a high level of support from the third sector?*

No.

- ♦ *Are any aspects of this proposal due to be, or already are, delivered by the third sector?*

Yes. For example, Healthy Air Cymru is a coalition of partner organisations in Wales all working together to support improvements in air quality.

- ♦ *Does any aspect of the proposal rely on volunteering for its delivery?*

In relation to the guidance on empowering workforces to tackle air pollution, officials are exploring the possibility of encouraging 'green representatives' within trade unions to promote and support air quality improvement within the workplace on an inter-sectoral basis.

- ♦ *Does any aspect of the proposal impact on community facilities / assets which third sector organisations use or own?*

No.

### 4.4 Justice Impact

Please answer the following in relation to your proposal:

- ♦ **Are you bringing forward new primary legislation?**

The Welsh Government will be including the Clean Air Bill in its Legislative Programme during the next Senedd term. A White Paper will be drafted for consultation during the current Senedd term.

- ♦ **Are you creating, removing or amending an offence?**

In terms of offences, the proposals include:

- In relation to smoke control, switching from a criminal regime to a civil enforcement regime
- In relation to domestic burning
  - enabling local authorities to carry out enforcement against suppliers breaching any ban on the sale and use of particular types of fuel
  - establishing the nature and level of any sanctions for such breaches, including what the funds generated can be used for and
  - banning bonfires and extending the smoke control regime to include outdoor burning

In relation to anti-idling, there is a proposal to provide local authorities in Wales with the power to increase the amount of fixed penalty for engine idling.

We will be assessing the advantages, disadvantages, risks, opportunities and constraints involved in transferring air pollution offences from criminal to civil law. However, neither the Clean Air Plan, nor the actions relating to the Bill will result in the creation, removal or amendment of an offence.

- ♦ **Could your proposal result in any other impact on the justice system e.g. through increased litigation, need for legal aid, appeal against a decision of a public body?**

Yes, however, officials will need to consider this issue more widely

**If YES to any of the above then you need to identify the impacts on the justice system. Please complete the Justice System Impact Identification, on the [Justice](#) intranet page.**

[<https://intranet/english/PolicyDelivery/AppraisingPolicy/Economic/Justice/Pages/Welcome.aspx>]



Justice System  
Impact Identification 2

*(Please be aware that, for new primary legislation, a Justice impact assessment **must** be completed and published. The Justice Policy Team will support and advise you through this process and the information you record in your **Justice System Impact Identification** will help you.)*

## SECTION 5. WHAT WILL BE THE EFFECT ON ENVIRONMENTAL WELL-BEING?

Under Section 9 of the Environment (Wales) Act 2016, the Welsh Ministers are required to prepare, publish and implement a natural resources policy and to take all reasonable steps to implement it and to encourage others to take such steps. The [Natural Resources Policy](#) was published in August 2017.

**You will need to consider and, where required, complete the following assessments** to ensure all reasonable steps have been taken:

<b>Required for all proposals:</b>	<ul style="list-style-type: none"> <li>Natural Resources Policy national priorities, challenges and opportunities</li> </ul>	5.1a 5.1b
<b>Required for all proposals</b>	<ul style="list-style-type: none"> <li>Biodiversity</li> </ul>	5.2 and Annex F
<b>Required for all proposals</b>	<ul style="list-style-type: none"> <li>Climate Change</li> </ul>	5.3
Certain plans and programmes requiring SEA under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004	<ul style="list-style-type: none"> <li>Strategic Environmental Assessment</li> </ul>	5.4 and IIA Guidance
Proposals which may affect a Special Area for Conservation or a Special Protected Area (SAC/SPA):	<ul style="list-style-type: none"> <li>Habitats Regulations Assessment</li> </ul>	5.5 and IIA Guidance
Certain projects relating to town and country planning; transport; agriculture; forestry; marine, land drainage; and electricity which require EIA under the various EIA Regulations	<ul style="list-style-type: none"> <li>Environmental Impact Assessment</li> </ul>	5.6 and IIA Guidance



## 5.1 Natural Resources

### 5.1a How will the proposal deliver one or more of the National Priorities in the Natural Resources Policy (NRP)?

- Delivering nature-based solutions;
- Increasing renewable energy and resource efficiency; and in doing so,
- Taking a place based approach.

The Clean Air Bill proposals will, following implementation, have positive impacts on biodiversity which will result in improved ecosystem functioning.

### 5.1b Does the proposal help tackle the following national challenges and opportunities for the sustainable management of natural resources?

- ♦ *Reverse the decline in biodiversity – by developing resilient ecological networks;*

A principle commitment of the Clean Air Plan is to contribute to improving biodiversity. Reducing air pollution by decreasing pollutant concentration levels will have a positive impact on the environment.

- ♦ *Safeguard and increase carbon stores in soils and biomass;*

Not applicable.

- ♦ *Maintain productive capacity, in particular by improving soil quality and biosecurity;*

Some actions, relating to treatment of ammonia, and use of nitrogen fixing plants will contribute to improving soil quality.

- ♦ *Reducing the risk of flooding;*

Not applicable.

- ♦ *Supporting climate change mitigation and adaptation through ecosystem approaches;*

There is a direct correlation between air quality and climate change mitigation, in terms of:

Reducing use of fossil fuel use, in particular for vehicular transport;

Improving and enhancing the environment and biodiversity;

Reforestation initiatives and urban greening.

- ♦ *Reducing noise pollution and pollution levels in our air, and enhance air quality;*

The Welsh Government recognises noise is an airborne pollutant alongside physical pollutants. Noise itself is outside the scope of the Clean Air Bill for Wales.

- ♦ *Improve the quality and ensure the quantity of our water;*

Not applicable.

- ♦ *Taking action to reduce the pressures on natural resources, such as through resource efficiency and renewable energy.*

The Clean Air Bill provision on the guidance empowering workforces to tackle air pollution aims to link improvement in air quality to decarbonisation by reducing emissions from agriculture; buildings; industry; the fluorinated gases sector; the power sector; waste; and transport.

- ♦ *Supporting preventative approaches to health outcomes, with a particular focus on key public health issues of transport related air and noise pollution, tackling physical inactivity and mental health;*

A principle commitment of the Clean Air Bill proposals is to contribute to improving public health. There is a direct correlation between poor air quality and increased levels of ill health, including mental health. The Clean Air Bill proposals will collectively contribute to promoting activity, well-being and health.

- ♦ *Supporting action to tackle health and economic inequalities;*

The Clean Air Bill proposals will create positive impacts on health as a result of cleaner air facilitating the public's participation in outdoor recreational activities. There will be positive steps towards equality in Wales, especially if improvements in emissions (hence concentrations) occur in deprived areas. This could also lead to an improved sense of community. There will be health benefits to the workforce but there are potential costs associated with abatement on businesses. The Clean Air Plan includes a section on "improving air quality to protect the health and well-being of current and future generations". This is supported by a range of commitments and actions.

- ♦ *Supporting community cohesion;*

The Clean Air Bill proposals will lead to positive steps towards equality in Wales, especially if improvements in emissions (hence concentrations) occur in deprived areas. This could also lead to an improved sense of community.

- ♦ *and supporting secure and stable employment;*

There could be positive employment impacts as a result of additional work arising from the manufacture and installation of the abatement technologies necessary to achieve cleaner air. The risk assessment in the full RIA shall be addressing the economic impacts and employment for affected sectors.

## 5.2 Biodiversity

To demonstrate compliance with Section 6 of the Environment (Wales) Act 2016, you must complete the Error! Reference source not found., at annex F below.

## 5.3 Climate Change

Climate change has been identified as one of the biggest threats facing our future generations. We need to reduce our emissions through decarbonisation action (5.3a) and to adapt to the impacts of climate change by increasing our resilience (5.3b).

### 5.3a Decarbonisation

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal affect emissions in Wales?**

- ♦ *To help you consider the impacts of your proposal on emissions it would be useful to think about whether your policy, either directly or indirectly impacts on land use, how we transport people/goods, buildings and infrastructure, waste, business and industry, Public Sector assets, energy demand and use.*

The Clean Air Bill proposals will have a beneficial impact on all aspects outlined above. There are likely to be cost implications for government and business, and potentially for individuals.

If the impacts you have identified are significant then you should undertake an assessment using the HM Treasury Green Book Greenhouse Gas valuation methodology. **Please explain your decision about whether or not to conduct a more thorough assessment of the effect on emissions.**

The Clean Air Bill, through delivery of its actions, is expected to contribute to a reduction in greenhouse gases. This is in alignment with the Welsh Government's Low Carbon policy, against which a full impact assessment has already been conducted. It is not anticipated the Clean Air Bill or its actions will result in a significant reduction in GHG emissions over and above those already forecast under the Low Carbon policy and Decarbonisation Strategy.

### 5.3 b Adaptation

**How (either positively or negatively), and to what extent (significant/moderate/minimal impact), will the proposal affect ability to adapt to the effects of climate change?**

There is an explicit link between the provision related to the guidance on empowering workforces to tackle air pollution, and decarbonisation. The guidance will encourage the move away from polluting vehicles. The provisions within the Bill relating to Clean Air Zones are also aimed at discouraging polluting vehicles through the creation of Clean Air Zones where targeted action is taken to improve air quality. A significant proportion of air pollution is generated by transport. Reducing the emissions from this source, and supporting the change to hybrid, fully electric or hydrogen powered vehicles will contribute to meeting air quality alongside decarbonisation targets. The same hold true for substituting fossil-fuelled power generation by renewable alternatives.

It is therefore expected that the Clean Air Bill will have a positive impact on air quality in Wales.

*Adapting to climate change means being prepared for effects such as increased temperatures, stronger winds, rising seas and more rain. Does the proposal help adapt to these changes or might it make matters worse?*

The Clean Air Bill does not include actions that would assist in adapting to these changes. It is however not anticipated that any provisions within the Clean Air Bill would make matters worse.

#### **5.4 Strategic Environmental Assessment (SEA)**

Refer to the integrated impact assessment guidance and relevant onward links to determine whether a Strategic Environmental Assessment is required.

**Please explain your decision about whether or not an SEA is required by law.**

Having reviewed the IIA guidance and relevant regulations, it is considered that an SEA is not required.

#### **5.5 Habitats Regulations Assessment (HRA)**

Refer to the integrated impact assessment guidance and relevant onward links to determine whether a Habitats Regulations Assessment is required.

**Please explain your decision about whether or not an HRA is required by law.**

Having reviewed the IIA guidance and relevant regulations, it is considered that an HRA is not required.

#### **5.6 Environmental Impact Assessment (EIA)**

Refer to the integrated impact assessment guidance and relevant onward links to determine whether an Environmental Impact Assessment is required.

**Please explain your decision about whether or not an EIA is required by law.**

Assessment against screening criteria concluded there is no requirement.



## SECTION 6. RECORD OF FULL IMPACT ASSESSMENTS REQUIRED

You have now decided which areas need a more detailed impact assessment. Please list them below.

Impact Assessment	Yes/No	If yes, you should
Children's rights	Yes	See Annex A
Equality	Yes*	See Annex B
Rural Proofing	No	
Health	TBC	Refer to the Integrated Impact Assessment Guidance
Privacy	No	
Welsh Language	Yes*	See Annex E
Economic / RIA	No	
Justice	Yes	
Biodiversity	Yes*	See Annex F
Climate Change	No	
Strategic Environmental Assessment	No	
Habitat Regulations Assessment	No	

Environmental Impact Assessment	No	Refer to the Integrated Impact Assessment Guidance
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\* Mandatory for all proposals in order to meet statutory obligations.

## SECTION 7. CONCLUSION

(Please note that this section will be published)

### 7.1 How have people most likely to be affected by the proposal been involved in developing it?

*Not only is it our duty to engage and consult in certain circumstances, but there is clear evidence that involving the public and stakeholders is central to successful policy and delivery. In keeping with the Well-being of Future Generations (Wales) Act 2015, we are committed to involving people. Please describe how you have involved:*

- *Children and their representatives;*

Children and young people had an opportunity to contribute during the consultation period for the Clean Air Plan (which comprised the Bill proposals) both through the normal consultation route, and through engagement with the Wrexham youth Parliament.

*People with protected characteristics under the Equality Act 2010;*

Those with protected characteristics had the opportunity to contribute during the consultation period for the Clean Air Plan (which comprised the Bill proposals)

- *Welsh speakers and Welsh language specialist groups;*

The development of the Clean Air Bill for Wales will adhere to the Welsh Government's Welsh Language Standards in relation to Welsh language considerations.

### 7.2 What are the most significant impacts, positive and negative?

*Please keep within 750 words*

*This section should be used to help complete section 6 of the MA template*

Cleaner air across Wales will provide significant and wide ranging benefits for all parts of society, our environment and our economy, including public health benefits. Effective action to improve air quality will help to generate a healthier workforce and improved productivity as the number of staffing hours lost to sick leave should reduce. Additionally, there could be positive employment impacts as a result of additional work arising from the manufacture and installation of the abatement technologies.

Social benefits include health benefits, better quality of life and improved opportunities for outdoor recreational activities.

The proposals will lead to positive steps towards equality in Wales, especially if improvements in emissions (hence concentrations) occur in deprived areas. This could also lead to an improved sense of community.

It is expected that there will be economic impacts for businesses. For example, abatement costs necessary to achieve the emission reductions will impact a range of sectors such as energy, manufacturing and transport.

Cleaner air across Wales will provide significant and wide-ranging benefits for all parts of society, our environment and our economy. The Clean Air Plan sets out how the Welsh Government will take action to reduce air pollution to support extensive benefits for Wales, safeguarding a healthy and more prosperous Wales for this and future generations. The strongest body of evidence connecting an air pollutant with mortality and other morbidity effects involves fine particulate. The most socio-economically disadvantaged areas tend to have the highest pollutant concentrations. This, together with such populations being the most susceptible (due to high prevalence rates of chronic illness due to strong correlations with poor lifestyle choices and behaviours) can lead to disproportionate health burdens. Introducing stricter targets for fine particulate matter will help to reduce the burden on society, especially for the most vulnerable and susceptible.

*Summarise the most significant impacts for the people, culture and Welsh language, economy and environment of Wales, expected as a result of the proposed action. Describe the themes that emerged from involving people. Refer to the seven well-being goals and the Welsh Government's well-being objectives. Contrast with the impact of current Welsh Government action if appropriate.*

The Clean Air Bill:

- Strengthens the existing legislative framework governing the management and regulation of air quality in Wales
- Contains a provision which will enable the different sectors to work collaboratively across Wales, taking action to reduce air pollution to improve public health, biodiversity and the natural environment
- Aligns air quality policy with wider Welsh Government policies (such as health, transport and decarbonisation)
- Embodies proposed actions with the sustainable development principle and supports the Well-being goals enshrined in our Well-Being of Future Generations (Wales) Act 2015 and the Environment Act 2016
- Embodies our commitment to The United Nations Convention on the Rights of the Child
- Links air quality and decarbonisation
- Combines existing commitments with new actions to address air quality improvement and
- Takes account of the Climate Emergency and Environmental Growth

The Clean Air Bill aims to enact a new target for fine particulate matter and to establish a target setting framework with a requirement for Welsh Ministers to set one or more pollutant targets.

The Clean Air Bill comprises a range of related proposals designed to support air quality improvement and improve the nation's health:

- a fit for purpose legislative and regulatory air quality management framework
- strengthened powers to address vehicle idling
- consolidated powers to implement Clean Air Zones / Low Emission Zones
- tackling emissions from domestic burning activities and improving the Smoke Control regime in Wales

- a duty on inter-sectoral bodies to adhere to guidance encouraging different ways of working and actions to reduce air pollution and support decarbonisation
- a requirement for a Clean Air Plan / Strategy to be published / reviewed every 5 years

It is believed that this proposal will have no adverse or detrimental impact on the Welsh language and culture.

The Clean Air Plan (from which the Bill proposals stem) addresses a range of key airborne pollutants, their impact and action being taken to improve air quality.

Key pollutants are:

- Particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>)
- Nitrogen Oxides (NO<sub>x</sub>): comprises nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>).
- Ground-level ozone (O<sub>3</sub>)
- Sulphur dioxide (SO<sub>2</sub>)
- Nickel (Ni)
- Benzo[a]pyrene (B[a]P)
- Ammonia (NH<sub>3</sub>)
- Non methane volatile organic compounds (NMVOCs)
- Benzene (C<sub>6</sub>H<sub>6</sub>)
- Lead (Pb)
- Carbon Monoxide (CO)

The Target Setting Framework may include the above pollutants, without limitation.

Noise pollution is closely associated with air pollution and is also addressed.

The Clean Air Plan uses a thematic approach to address broad areas of impact, where work across organisations and themes can better address problems and build collaborative approaches to future action. The themes complement each other and interact to create a sustainable approach to improving air quality, integrated with other policy and legislation. The themes are:

- **Improving air quality to protect the health and well-being of current and future generations** - including communications, behavioural change, education, and tackling domestic combustion;
- **Improving air quality to support our natural environment, eco-systems and biodiversity** - including, water and land management, woodland creation and biodiversity;
- **Improving air quality to support a prosperous Wales** - including industrial pollution, economy, energy, waste, agriculture;
- **Improving air quality to support sustainable places** – including transport, planning and national and green infrastructure

Each theme in the Clean Air Plan is supported by a chapter and associated actions. The actions are framed within the current Senedd (to 2021) and next Senedd period (2021-26) and the future from 2026 onward.

Electricity Generators, Road Transport, Iron & Steel Industries, Refineries, Sinter production, Oil & Gas Production, other industrial Combustion, other non-industrial Combustion, Railways, Shipping, Agriculture;



It is believed that this proposal will have no impact on the Welsh language and culture.

### 7.3 In light of the impacts identified, how will the proposal:

- **maximise contribution to our well-being objectives and the seven well-being goals?**

The Clean Air Bill proposals are set within the context of our obligations under the Well-being of Future Generations (Wales) Act 2015 sustainable development principle which places a duty on all public bodies in Wales to consider how their actions might impact in the long term and how they will alleviate problems of poverty, health inequalities and climate change.

The Clean Air Bill proposals contribute to the goals of the Well-Being of Future Generations (Wales) Act 2015, primarily by aiming to achieve a healthier Wales and a resilient Wales. This demonstrates our commitment to being a globally responsible Wales. Developing our knowledge, skills and capabilities in addressing air quality and reducing harmful emissions will contribute to being a prosperous Wales. We can demonstrate a Wales of cohesive communities through the way in which we address change at personal, neighbourhood and spatial levels, and through our communities of interest (e.g. agricultural, business and industrial, cultural, historical and sporting, educational, environmental, technological, age-related) across Wales and the wider world.

#### Well-being Goals and air quality

Goal	Description	Impacts	Clean Air Bill contribution
A prosperous Wales	An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in <b>an economy which generates wealth and provides employment opportunities</b> , allowing people to take advantage of the wealth generated	<p>Impacts on businesses, competition and employment, productivity</p> <p>Effects of exposure to air pollution on health.</p>	<p>Clean Air Bill contribution</p> <p>Wales is dependent on a productive workforce and attractive places for businesses to invest. The Framework will focus on the support to ensure economic growth in Wales while set air pollutant targets improve air quality.</p> <p>A healthy workforce and clean environment would contribute to prosperity through a productive workforce. Improvements in health reduce medical and health costs. Positive employment impacts would also arise for those companies that manufacture and install abatement technologies in the UK.</p> <p>Costs (financial costs) required to ensure the reductions in air pollution through newly set targets will affect a wide range of sectors. We will take action to manage any potential adverse impacts on employment, competition and small and medium-sized enterprises (SMEs).</p>

Goal	Description through securing decent work.	Impacts	<p>Clean Air Bill contribution</p> <p>Emission reduction from transport, industry and other sectors has a direct and significant positive impact both locally, regionally and nationally on the Welsh environment and ecosystem functioning.</p> <p>The aims of the decarbonisation programme will have a direct effect on air quality and <i>vice versa</i>.</p> <p>Setting specific air pollutant targets will not only reduce emissions and build resilience but also ensure the area of Wales we live in has clean air and water, liveable places, productive farmland, energy security and green jobs.</p>
A resilient Wales	A nation which maintains and enhances a bio-diverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example, climate change).	Impacts on air quality, greenhouse gas emissions and effects of pollution on biodiversity and natural habitats	
A healthier Wales	A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood	Impacts on human health	Poor air quality can have a disproportionate impact on the health and well-being of children, older, poor and vulnerable people. Reduction of air pollution and pollutant concentration levels according to international evidence (i.e. WHO) will have a direct and significant impact on improving human health and welfare for everyone.
A more equal Wales	A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).	Impacts of air quality actions on equality	<p>All people who live in and visit Wales will benefit from air quality improvements, no matter what their background or circumstances are.</p> <p>Poor air quality can have a disproportionate impact on the health and well-being of children, older, poor and vulnerable people</p>

Goal	Description	Impacts	Clean Air Bill contribution
A Wales of cohesive communities	Attractive, viable, safe and well-connected communities	Air quality Impacts on communities	<p>Tackling impacts of poor air quality and improving air quality and human health will have a positive impact on promoting equality in Wales, especially where improvements coincide with high pollutant concentration levels.</p> <p>Positive (indirect) / Neutral – Actions to improve air quality which are led by or co-produced with local communities will carry greater impact and be better integrated with other actions to improve the quality of life, health and well-being, the environment and opportunities for prosperity.</p> <p>Improved air quality in deprived communities would contribute to better quality of life and community cohesion.</p>
A Wales of vibrant culture and thriving Welsh language	A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation.	Impacts on health, environment, culture and population	<p>Action to support individuals, businesses and Government to understand, value and identify with the importance of improving air quality in Wales, will empower everyone to play their own role in supporting reductions in air pollution.</p> <p>We are committed to having air quality which enables the people of Wales and visitors to enjoy and promote a wide range of recreation activities across Wales.</p> <p>Improved health would provide further opportunities for people to participate in sports and recreational activities.</p> <p>Protection of natural ecosystems and biodiversity would enhance the</p>

Goal	Description	Impacts	<p>Clean Air Bill contribution cultural capital of Wales and provide outdoor activities.</p> <p>We expect, and will actively encourage, promote and facilitate, the use of the Welsh language through education and services as set out in 'Cymraeg 2050: A million Welsh speakers. We will ensure equal standards of services in both English and Welsh. As we implement the Clean Air Bill, we will foster a Welsh identity which is distinctive.</p>
A globally responsible Wales	A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being. Goal 7 recognises that in an inter-connected world what we do to make Wales a sustainable nation can have positive and adverse impacts outside of Wales.	Impacts on air quality, greenhouse gas emissions and biodiversity/habitats	<p>Air pollution is a major global environmental problem affecting everyone. Air pollution does not stop at or respect national and international borders. We will take strong positive action on air quality in Wales to meet our national and international ethical and legal obligations. Actions to improve air quality will be closely aligned with action on decarbonisation.</p> <p>Improved air quality would directly contribute to environmental well-being in Wales. Protection of ecosystems in NATURA 2000 sites and Sites of Special Scientific Interest (SSSIs) is an international contribution to maintaining biodiversity.</p> <p>Compliance with the national emission ceilings is a contribution to international progress in reducing transboundary air pollution outside Wales, with reciprocal benefits from emission reduction outside Wales, including in the rest of the UK.</p>

Five Ways of Working	The Clean Air Bill aims to deliver in line with the Act's Five Ways of Working by:
<b>Prevention</b>	Taking <b>preventative</b> action to reduce the impacts of air pollution on public health and the natural environment, by adopting preventive approaches where we can, and developing successful early actions whilst devising long term solutions.
<b>Long term</b>	Establishing <b>long-term targets</b> and sustainable actions to achieve the progressive reduction of emissions and pollutants in the air – for example, the progressive reduction of concentration levels of pollutants including PM <sub>2.5</sub> in the air.
<b>Collaboration</b>	<b>Collaboration</b> with relevant departments within the Welsh Government, UK Government, national partners and at a local level to ensure actions are implemented and well-being objectives are met –
<b>Integration</b>	Improving the <b>integration</b> of air quality management processes through better working practices between public, commercial and third sector organisations, balancing the tensions between, say, reducing emissions and promoting economic productivity.
<b>Involvement</b>	<b>Involving</b> stakeholders in the development and delivery of the programme of work at all stages, understanding what is needed in different places by different groups of people.

Under the Well-Being of Future Generations (Wales) Act 2015, we have established average population exposure to NO<sub>2</sub> as one of the Welsh Government National Indicators which are used to measure progress towards well-being goals in Wales. Regulations made under the Act require public services boards to consider air quality when carrying out their statutory assessments of local well-being.

*What action can the Welsh Government take to promote biodiversity, children's rights, equalities, the Welsh language or another of the areas covered by your impact assessments?*

See above, and relevant annexes below.

*What action can the Welsh Government take to strengthen its contribution to a particular goal or contribute to additional goals?*

See above

*What action can the Welsh Government take to avoid, reduce or mitigate a negative impact?*

See above

*If no action is to be taken to avoid, remedy or mitigate a negative impact then please explain why.*

Not applicable.

**7.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?**

*What plans are in place for post implementation review and evaluation?*

The Clean Air Bill will be introduced in the Senedd during the next term. Following implementation, it will be subject to regular monitoring, evaluation and review.