



Llywodraeth Cymru
Welsh Government

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Welsh Government
Consultation – summary of response

Reducing emissions from domestic burning of solid fuels

October 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

Summary of responses to the consultation on reducing emissions from domestic burning of solid fuels

Action required

This document is for information.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: <https://gov.wales/reducing-emissions-domestic-burning-solid-fuels>

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Introduction

Our '[Clean Air Plan for Wales: Healthy Air, Healthy Wales](#)' aims to improve air quality and reduce the impacts of air pollution on human health, biodiversity, the natural environment and our economy. The Plan set out actions to reduce emissions from domestic burning of solid fuels, including a commitment to consult on the prohibition of wet wood and bituminous house coal.

Welsh Government consulted on proposals to reduce emissions from the burning of solid fuels between 13 January 2021 and 7 April 2021. The document contained proposals to ensure only the cleanest forms of solid fuels and appliances are used in Wales. Due to ongoing impacts of the COVID pandemic, local authorities were given an extended deadline of 16 June 2021 to respond to the consultation. Local authorities have a key role in reducing emissions from domestic burning of solid fuels and it was important to ensure they were able to provide their views.

This document provides a summary of responses received to the consultation. It incorporates feedback from 203 responses to the online consultation (of which 70 responses were provided to the Easy Read version) and 35 responses provided in writing, of which 3 were based on the Easy Read format. It also draws on opinions and comments provided at an event held on 11 March 2021 to discuss the consultations on the White Paper on a Clean Air (Wales) Bill White Paper and reducing emissions from domestic burning of solid fuels.

All responses have been reviewed and will continue to be considered by relevant departments across Welsh Government, delivery partners and stakeholders to inform the development and implementation of policy proposals.

Consultation overview

The following tables outline the number of responses received to the consultation and range of organisations that responded.

Standard Text Consultation responses	
Written responses (E.g. handwritten, email, documents)	33
Online responses	
Full	104
Partial	29
Total of online responses	133
Easy Read Consultation responses	
Written responses (E.g. handwritten, email, documents)	3
Online responses	
Full	35
Partial	35
Total of easy read online responses	70

Consultation events and participants	
Online engagement event (11 March 2021)	46
Total number of contributors	285

A list of organisations and named respondents who did not wish to remain anonymous is included at Annex A.

44 organisations contributed responses. The largest sectoral representations were from professional and trade associations, private sector companies and charities or community organisations.

Named Organisations	Local Government	Private Sector / PLC	Professional Association	Health / Public Body	Third Sector	Campaign or Lobby Group
44	7	15	11	3	7	1

The Welsh Government is grateful to all those who took the time to respond to the consultation.

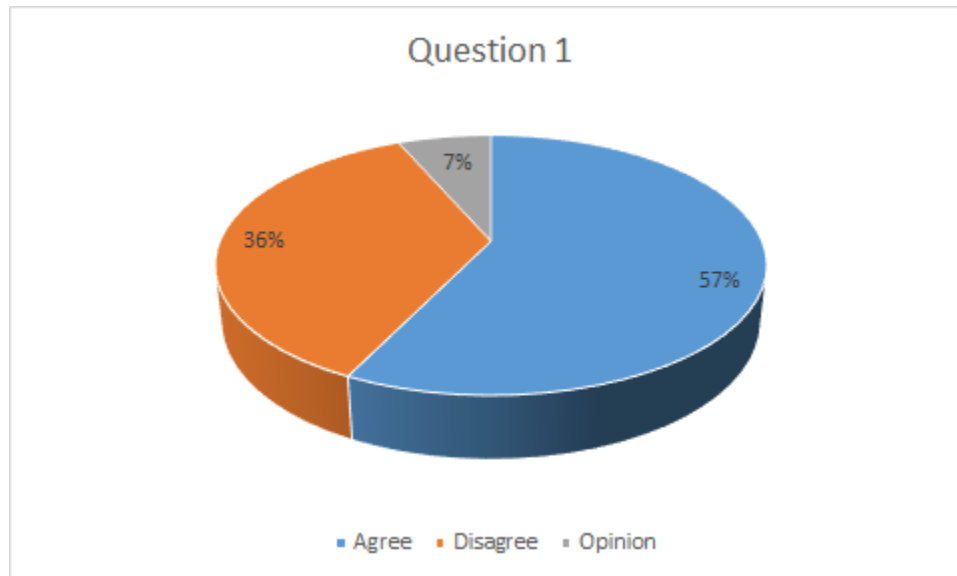
Breakdown of responses

A breakdown of responses for each question is outlined below, including indicative quotes.

Question 1

Do you agree that we should phase out the use of bituminous/traditional house coal for domestic/residential burning?

Responses submitted



138 respondents provided an answer to this question. 79 agreed, 50 disagreed and 9 provided additional comments.

Whilst the majority of responses agreed with the approach, concerns were raised about the cost of alternative fuels and the risk prohibiting house coal may result in greater use of wood. This could negate any benefit to reducing emissions derived from a ban. Respondents also expressed a need to take account of the specific needs of rural residents before legislation is implemented.

Indicative quotes

“Yes. Combustion of bituminous/traditional house coal gives rise to a disproportionately large amount of fine particulate matter (PM_{2.5}) per unit of heat output when compared to other methods of domestic heating.” **(Public Health Wales)**

Members felt that a phase out of traditional house coal for domestic burning was an appropriate step in tackling climate change and reducing carbon emissions given the value of fine particulate matter emitted from burning solid fuel and the effects on human health and the environment. However, members questioned whether investing in the banning of burning domestic solid fuels which affects around 1% of Welsh households would have the best outcomes compared with investments into renewable energy, for example.” **(Farmers’ Union of Wales)**

“No. Every privately owned household should have the right to have a traditional coal fire if so wished. Sitting from an open fire during the winter months should be a freedom choice without intervention from government, there is too much intervention in way people live their lives as it is, covid19 is an exception. Is the Walsh (sic) Government going to pay to convert my fireplace and household heating to something else, don't think so. It's my own choice to have an open fire and yes I know all about pollution etc etc.” **(Individual respondent)**

“I'm 69yrs old I have used coal since 1970 for heating my home and hot water, we find its cheaper for us, besides when you look at a coal fire it makes you feel good which is good for our mental health especially when we are staying in more.

When you look at the amount of coal fires in the valleys it isn't a fraction as it used to be, Yet you dare to pick on the older folk in Wales, as that is our choice of heating, yet you back off from giving the same ultimatum to the existing diesel car lorries, buses, trains, ferries, airplane flying over Wales and tyres being burnt in power stations. Which is putting out hell of a lot more than a few thousand coal fires. Get rid of them first, until then I will fight for my rights in court if I have to.” **(Individual Respondent)**

“I do as long as there is a huge promotion on the use of the authorised Smokeless fuels and what benefits it has not just on the atmosphere but to the end user.” **(Individual Respondent)**

Welsh Government Response

The majority of respondents were in favour of phasing out the use of bituminous house coal in the home. In light of this, we will bring in regulations to ban the sale of bituminous house coal. This will support our goal of improving air quality, particularly in urban areas. Further detail is outlined in the Government Response section of this document at page 76.

Question 2

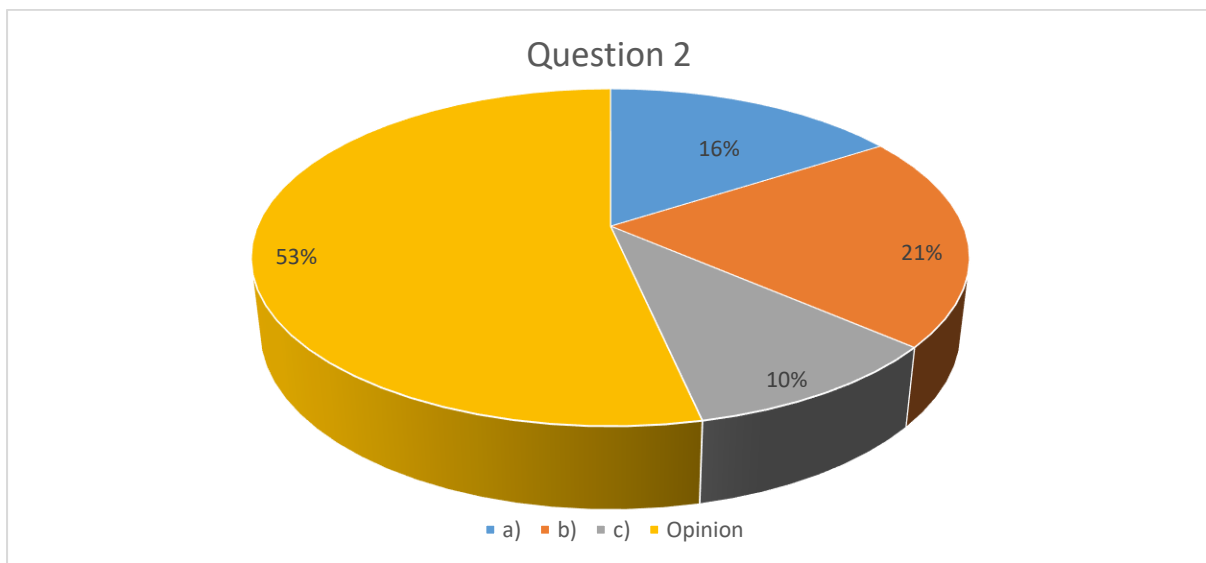
What do you consider is a reasonable transition period to allow industry and householders to use up existing stock?

a) 1 year?

b) 2 years?

c) No transition period?

Responses submitted



Of the three options presented in the consultation document, 14 respondents opted for a 1 year transition period, 18 for 2 years and 9 respondents felt there should not be any transition. The majority of responses provided opinions, principally in regard to the justification for any ban, but also proposing longer transition periods.

Indicative quotes

“No transition period. Bituminous/traditional house coal gives rise to a disproportionately large amount of PM_{2.5}. There is no evidence of a safe level of exposure to PM_{2.5} or a threshold below which no adverse health effects occur. A transition period will allow continuation of the adverse health impacts associated with exposure.” **(Individual Respondent)**

“You cannot ban coal, many rural households require the use of coal to effectively heat their houses. We do not all live in Cardiff or Swansea with access to electric heating. Some of us REQUIRE coal to heat our houses and we have a basic human right to heat our houses.” **(Anonymous Respondent)**

“Coal will be removed from England in May 2023. It is important to avoid cross border selling that the phase out of coal in Wales is no later than this date. There is

no need for a transition period as the trade is well aware of the phase out of coal and can transfer easily to smokeless fuels. Merchants sell both coal and smokeless fuels and hence can transition easily in the time required for the legislation to pass through Welsh government. In terms of importers the relatively small volumes of coal are sold in Wales 30-40kt p.a. This volume will not make a significant difference to imported volumes and could be facilitated at short notice by flexing contractual and shipping arrangements. Hence CPL supports the phasing out of coal with no transition period or at the latest implement the banning of coal before May 2023 in line with England the major market for coal.” **(CPL Industries Ltd.)**

“Rhaid sicrhau amser rhesymol i wneud y newidiadau cyn cymeryd camau gorfodol” / “A reasonable amount of time must be made to make the changes before taking enforcement action” **(Ymatebydd Unigol / Individual Respondent)**

Welsh Government Response

We aim to provide a transition period and will agree the duration during the development of the regulations. The purpose of the transition period will be to facilitate businesses depleting their stocks and we will work closely with the coal supply industry during this time.

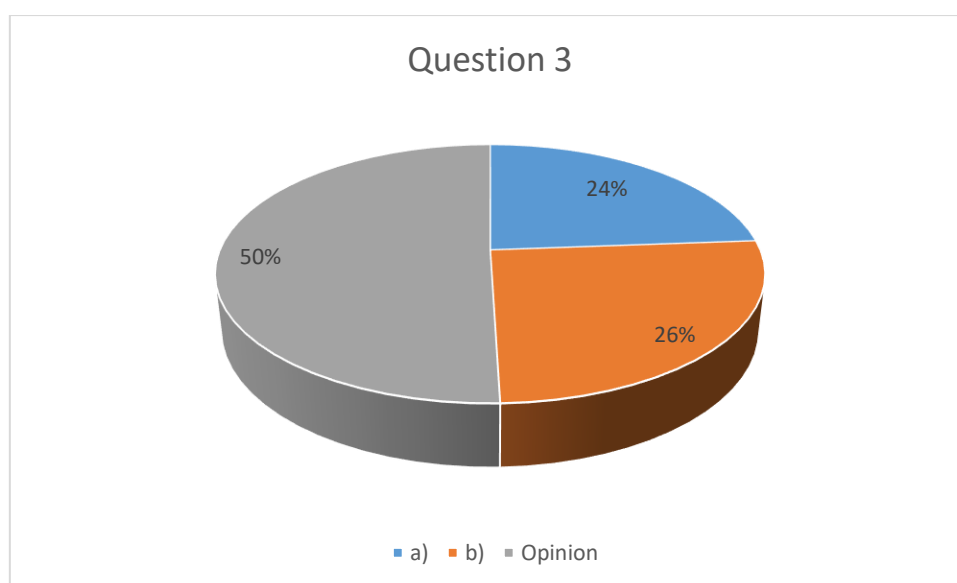
Question 3

In the event of a ban we would need to ensure that bituminous/traditional house coal products are prevented from being marketed as “smokeless” or “low smoke” fuels?

a) Would you consider the Irish model of registration of suppliers appropriate?

b) Would you prefer to see an industry-led (similar to “Ready to Burn” scheme) approach?

Responses submitted



There were 105 responses to this question. 25 favoured a statutory registration model to ensure that fuel suppliers were complying with the regulations, while 27 respondents preferred to see an industry-led approach. Of the remaining responses, 35 expressed opinions and 18 responses did not state a preferred option.

Indicative quotes

“Defra and England are well in advance of Wales on this subject and any deviation by WAG away from what is already being implemented in England will be unworkable on many fronts, packaging, mixed message to border communities, the burden of extra cost on Welsh companies like ourselves who are nationwide distributors.” (D J Davies Fuels Ltd.)

“Prefer to see an industry-led approach (similar to “Ready to Burn”) This would create alignment with England driving consistency for retailers selling

bituminous/traditional house coal products, particularly those who operate in both nations.” **(Assoc. of Convenience Stores)**

“We understand the need to register approved suppliers that are willing to stick to the rules and yes let's hope they do but to be honest the only way to prevent smoky coal being classed as authorised for use as smokeless is policing it. This would cost a lot of money and need a lot of man power. This argument regarding smoky coal being branded in smokeless bags as been a thorn in wholesalers of the good premium smokeless fuels side for years. This ready to burn scheme can only be used for logs. How can that be used for smokeless fuels?” **(Individual Respondent)**

Welsh Government Response

Manufactured fuel products with a biomass content of more than 50% are exempt from the Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020 (Defra's 2020 Regulations). We recognise there is a potential risk of house coal derivatives being combined with biomass in these proportions, which may result in more polluting products becoming available. Under current arrangements, these products would not be subject to regulation and testing. We will work with Defra to develop an approach to minimise this.

The Ready to Burn scheme has now been extended, under Defra's 2020 Regulations, to include smokeless fuels (but as previously mentioned not manufactured solid fuels containing more than 50% biomass). It is now a requirement that suppliers in England are registered with an approved scheme. The only scheme currently approved is Ready to Burn. We will explore the practicalities of adopting the Ready to Burn scheme in Wales. However, we will also be mindful of the potential impact of regulatory costs being passed on to households and the impact this may have on fuel poverty.

Question 4

In order to comply with any proposal to phase out bituminous/traditional house coal what adjustment, if any, would your business need to make?

Responses submitted

38 responses were submitted for this question, of which 23 were from businesses and 15 from individual respondents.

Indicative quotes

“A business I volunteer on would not be able to run its tourist trains - this pre covid was a £5M business on its own and is calculated to be worth £15M to North Wales tourism and part of 27% of the wealth of Wales in the Hospitality sector - get real is all I can say.” **(Anonymous Response)**

“Education of the end user is key for merchants to be able to carry on within the trade and make a living. Huge financial implications for reprinting of bags and signage, potential job losses due to the loss of trade.” **(J. J. Jones (Wholesale Ltd.))**

“Fel ag y mae ni fuaswn yn gallu cynhesu y ty yn effeithiol mewn cyfnod o dywydd garw. Pan rydym yn colli cyflenwad trydan nid yw'r gwres canolog yn gweithio felly sut mae rhywun yn cadw yn gynnes? Mi ydym yn colli cyflenwad mewn ardaloedd gwledig a dyna pam fod y rhan fwyaf o dai efo dwy ffordd o'i cynhesu.” / “As it is, we couldn't heat the house effectively in a period of inclement weather. When we lose an electricity supply the central heating doesn't work so how does one keep warm? We are losing supply in rural areas which is why most houses have two ways to heat it.” **(Ymatebydd Unigol / Individual Respondent)**

Welsh Government Response

The proposals contained in the consultation relate to the use of coal and wet wood in a domestic setting. As with Defra's 2020 Regulations, heritage rail and steam attractions would be exempt from any subsequent regulation of these fuels.

From the responses received, the main impact to business will depend on the route taken for regulation and registration of suppliers. Please refer to our response on this at Question 3.

Individual respondents highlighted the potential increase in costs associated with purchasing alternative fuels or heating sources. Other information provided related to the lack of alternative fuels, either due to the nature of the dwelling (unsuitability for sustainable solutions), lack of access to mains gas and the reliability of electricity supply. We will take on board the information provided in response to the question.

Question 5

What support might you require to make these adjustments?

Responses submitted

We received 11 responses from private sector companies and trade associations, and 31 from others.

Indicative quotes

“R&D support to produce alternative fuels. There is a current growing realisation of the cost implications to produce the England compliant packaging for 1st May 2021. Plus the ridiculous large amount of plastic packaging that is to be scrapped. This latter point alone is an environmental disaster that is yet to hit the news media.” **(D. J. Davies Fuels Ltd.)**

“Financial support for coal merchants for rebranding and educational information would be helpful. Media help to educate the end users of fuels and woods to make sure that people who are hit hardest will be able to adjust.” **(J. J. Jones (Wholesale Ltd.)**

“Plenty of advertising of the benefits of using Smokeless fuels for their appliances.” **(Individual Respondent)**

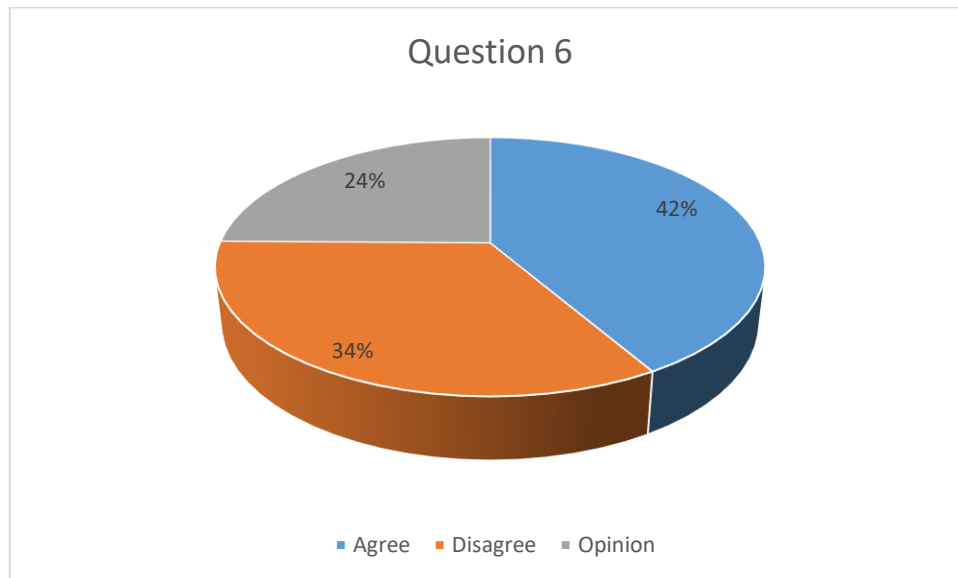
Welsh Government Response

Responses to this question highlighted the need for educational materials and that financial support may be required. We will engage further with coal suppliers across Wales to better understand the support required. This includes understanding the implications of different approaches for disseminating information to individual households on cost-effective and less polluting alternatives to coal.

Question 6

Do you agree that we are taking appropriate steps in view of the need to reduce our carbon emissions?

Responses submitted



47 respondents agreed the measures proposed in the consultation will assist in the efforts to reduce Wales' carbon emissions. 38 disagreed, though these responses were split between those feeling that our proposals do not go far or quickly enough, and those who felt there are larger concerns that Wales can address, such as transport emissions, particularly from air travel.

Indicative quotes

“Agree that carbon emissions need to be reduced but targeting domestic users only is not going to solve the problem, non-essential travel, food and product mileage, travelling longer distances to work, jumping on aircraft with ease as if it's a bus ride etc. and the list goes on. As I have previously written if WAG are so concerned with carbon emissions why do they own and support the development of a highly polluting Cardiff Airport, show the population a leading step and close it down. A single transatlantic flight would consume 90,000 litres of fuel, this is far more than what my whole business consumes in 1 year.” **(D. J. Davies Fuels Ltd.)**

“Yes, but they should be proportionate and a full evaluation of costs versus benefits needs to be undertaken. One size may not fit all. A large number of highly polluting properties in a deep urbanised South Wales valley has a much more concentrated environmental impact than a single historic house in an isolated rural setting.” **(Historic Houses)**

“Yes, but you need to tread carefully. A lot of people have no choice about their heating options, because of location, poverty, or their building's infrastructure. If you

do ban traditional house coal, you need to ensure there are measures to support people who have no choice: education (about what you are doing and why), grants/funding to move to alternative forms of heating, and measures to help those who slip through the gaps (people who may have some income but not enough to be able to change their form of heating).” **(Individual Respondent)**

“I don’t believe the action should be taken until there is a low cost alternative fuel as many users could have a low or limited income.” **(Individual Respondent)**

Welsh Government Response

Decarbonisation of the Welsh economy is an important policy goal and we have a legal requirement to achieve the climate targets set by the Senedd in March 2021. The targets include a 63% reduction in greenhouse gases by 2030 on the way to reaching net zero in 2050. The latest data for 2021 shows Welsh emissions were 35% lower than the baseline. During the 2020s we need to more than double the reductions we managed in the previous 30 years.

We must reduce greenhouse gas emissions from all sources, including the burning of solid fuels by households. The domestic combustion sector is not the largest emitter of CO₂ but addressing these emissions is one of a wide range of measures we are putting in place to achieve our statutory targets. However, we will also be mindful of the potential impact of regulatory costs being passed on to households and the impact this may have on fuel poverty.

Question 7

If you have any further comments or suggestions on this section, please provide them here.

Responses submitted

50 respondents provided further comments to this section on the proposal for a prohibition on the sale of house coal.

Indicative quotes

“To aid compliance with proposals it would be appropriate to ensure controls are, as a minimum, in line with those in the other UK nations.” **(Public Health Wales)**

“I do not agree that the increase in emissions is totally from domestic burning of solid fuels. The UK government has supported a transition away from fossil fuels to heating by Biomass (Wood Chip/Pellets) with the RHI scheme. Regular use by domestic burning would consume on average 1 or 2 cubic metres of logs per winter season, a single commercial biomass boiler would consume at least a cubic metre per hour. Commercial consumption of wood runs in the hundreds of thousands of tonnes pa. This is the very same emissions to atmosphere, no monitoring technology can segregate domestic from commercial emissions. And then of course we have the government supported wood fired power stations in Wales and UK, emitting to the very same atmosphere. I strongly feel that the domestic consumer is being penalised unfairly and is being targeted as the biggest polluter.” **(D. J. Davies Fuels Ltd.)**

“Given that for a number of homes solid fuel is the most effective source of heating, indeed as acknowledged in the consultation, rural areas have a higher proportion of households that rely on solid fuels (4%) compared to Wales as a whole, FUW members agreed that any proposals must be fair to those in rural communities and those experiencing fuel poverty, especially more vulnerable people such as the elderly.” **(Farmers’ Union of Wales)**

“I believe that all domestic burning should be banned. It is impossible to police or restrict what people burn. Some people WILL burn treated/toxic timber. Wood smoke contains many of the same carcinogens as tobacco smoke. While wood burning is allowed, our farmers will fell trees and burn off all excess branches/foilage - this will be wet and cause significant pollution. We are also reducing the number of trees we have. We then use energy in kilns to dry the wood prior to sale, while many people, like myself, use energy powering air purifiers in an attempt to breathe clean air.” **(Individual Respondent)**

“Firstly one thing to think about is are the public going to get any kind of help to change fuels. This coal trade has been targeted for years, they have been targeted for so long to do away with coal. What about people who are afraid of gas and change? Nobody is thinking about all the people that will lose their jobs, what about all the customers the coal merchants will lose? We are struggling to survive now. I

have house coal customers that buy once a year 6 and 8 tons of house coal. There is no gas where they are. I believe that nobody cares about the merchants or their staff. I do agree that wet wood should be banned straight away.” **(J. W. Collins & Son)**

Welsh Government Response

Key themes that emerged in response to this question were:

- The cost of replacement fuels should be regulated or supported by government.
- Any controls should be in line with those in the other UK nations.
- Any proposals must be fair to those in rural communities and those experiencing fuel poverty.
- Industrial burning should be tackled, not domestic. The technology cannot segregate domestic from commercial emissions.
- Behaviour change is needed.
- A public awareness campaign is needed.

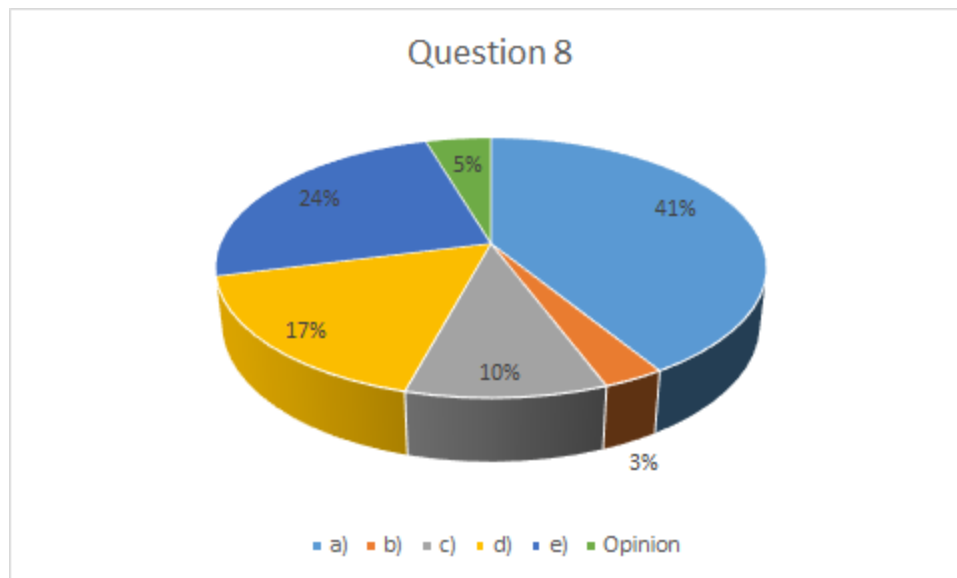
We will take these themes into account in the development of the regulations.

Question 8

We are considering a minimum volume for the sale of wet wood to householders. We are proposing that this is set at 2m³, but we are inviting your views on this point. Please indicate what limit you think this should be set at.

- a) There should be no limit
- b) No volume below 0.5m³
- c) No volume below 1m³
- d) No volume below 2m³
- e) No sales of wet wood

Responses submitted



6 respondents provided opinions without specifying a particular choice. In some instances, the responses suggested alternative limits, but they also highlighted the potential impact on small scale suppliers should any limit be set too low.

No restrictions (Option a) on the sale of wet wood received 41% but some form of limit received 55%. (However, see response below.) Further analysis of this larger group indicates 55% preferred some limit to an outright ban on sales of wet wood.

Indicative quotes

“No volume below 1m.” **(National Coppice Federation)**

“FUW Members felt that a minimum volume for the sale of wet wood to householders would need to be carefully considered, expressing concerns about the impact that this might have on small local suppliers who supply small amounts of unseasoned wood direct to their customers for them to season at home. Members felt that there may be an increase in kiln dried logs and questioned whether that would lead to further emissions.” **(Farmers’ Union of Wales)**

“We agree that it is appropriate for small domestic users to be supplied with pre-seasoned wood ready for burning. It is important that small forestry businesses can supply high quality seasoned firewood at a variety of scales. Many domestic users may not have capacity to appropriately store 2m³ of stacked firewood, but for suppliers, the sale of unseasoned timber for customers to season at home is a much simpler transaction that requires suppliers to have fewer facilities. Any reduction in the extent of the small-scale wood sales could lead to an upswing in the already regular issue of timber theft from our woods, particularly of hardwood from native woodlands. It is important that people are able to continue to easily grab a net of logs from the garage for their firepit, otherwise the next best thing will be to scavenge it from the wood next door.” **(Coed Cymru)**

Welsh Government Response

It appears that some responses to Option A support a ban on the sales of wet wood, so the ambiguity of how this question was posed has led to a skewed outcome. Analysis of the comments indicate a higher number of respondents support a total ban on wet wood sales than the headline figures indicate. It is likely that the 41% support for no restrictions on the sale of wet wood is actually much lower. When asked for the preferred limit of sales of wet wood, the most common answer was 2m³ limit.

Key themes that emerged in response to this question were:

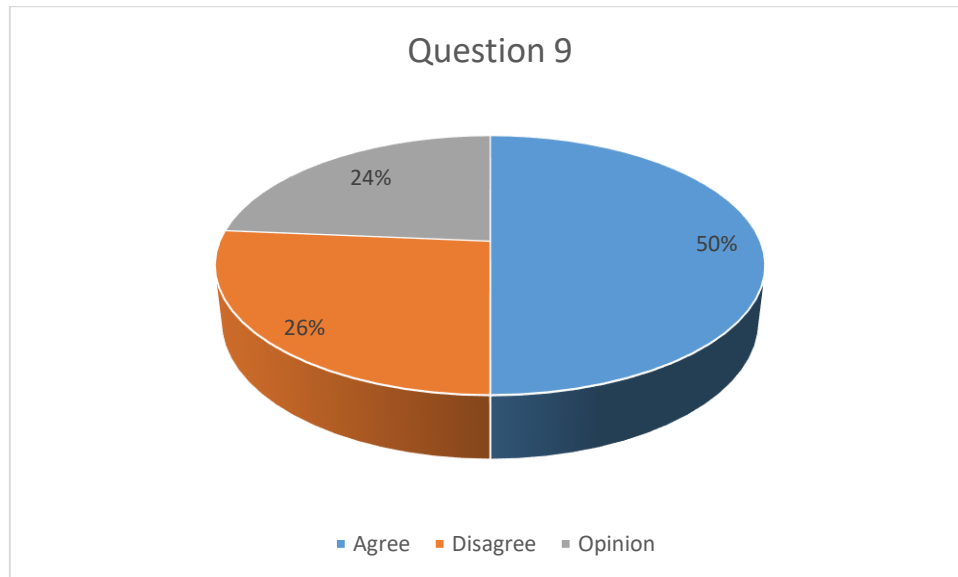
- A ban on sales of wet wood is likely to have the biggest impact on domestic combustion emissions.
- Government should not rely on prosecution to improve air quality. Raising awareness is more appropriate.
- Only 30% of wood sales in Wales are seasoned wood. A transition period of 3-5 years would be required for suppliers to allow for drying.

We will be placing a limit on the sales of wet wood in Wales and the volume will be determined during the development of the regulations. We will take the themes from this question into account.

Question 9

Do you think that suppliers and retailers should be given a transition period to sell existing stocks of wet wood?

Responses submitted



55 respondents supported some form of transition period. In respect of those that disagreed with the concept of a transition period, 17 respondents felt immediate action is required to prevent the sale and therefore use of wet wood, whilst the remainder objected to any limit to sales of wet wood.

Indicative quotes

“No. Wales stands to make huge gains in reducing levels of PM_{2.5} by banning the sale of wet wood. And so, such a measure must be implemented at pace without a transition period. This must be supplemented by information to suppliers and households about the dangers of burning wet wood as well as advice on how to properly dry wood so that it is safer to burn.” **(Healthy Air Cymru)**

“Yes. 1 heating season, if the wood is not burnt in 1 season and it is stored correctly in a dry well ventilated store the wood will dry naturally to 20% moisture content on its own accord and will become compliant, therefore the problem disappears.” **(D. J. Davies Fuels Ltd.)**

“Yes. Fire wood is a highly variable material with some species, such as oak needing 4-5 years to season fully. Capital costs for introducing improved storage are high and cashflow pressures will arise from the amount of money that is tied up in firewood stock that needs storing for several years. Training is likely to be needed

on assessing the moisture content of the firewood correctly before sale e.g. checking using a pin meter in the end of a log.” **(Coed Cymru)**

“Yes. The industry standard for logs as woodfuel was until recently 25%, as evidenced in HETAS’ Woodsure Terms and Conditions - <https://woodsurre.co.uk/woodpress/wp-content/uploads/2019/07/Woodsure-Rules-for-Participation-Rev-2-1-May-2017.pdf>. 20% is more readily achievable by kilning woodfuel, not a process readily within the capacity of any of our members without longer term development and support. Significant producers of kiln dried wood have benefited from years of support under the Renewable Heat Incentive, some of which are based close enough to be supplying into Wales - https://www.whatdotheyknow.com/request/639493/response/1529494/attach/6/EIR%2024%202019%20Response%20Letter.docx.pdf?cookie_passthrough=1. It seems fair to offer at least 2 years transition to businesses that are kept afloat by woodfuel earnings.” **(National Coppice Federation)**

“It is not the SALE of wet wood that is the issue here, it is the USE of wet wood. No-one in their right mind burns wet wood, it’s a waste of money. The majority of people, like myself, who buy wet wood do so in order to dry it prior to use. This is not something to be regulated, it should be down to education and labelling i.e. with the moisture content shown AND the recommendation of the period it needs to be stored under cover to bring it below say 15-20 % MC.” **(Individual Respondent)**

Welsh Government Response

Key themes that emerged in response to this question were:

- Diverse opinions were received from absolutely no transition period to prevent future sales of wet wood, to supporting a transition to help suppliers season their stock before sale.
- Any transition period will help with behaviour change.
- Support for small scale suppliers and retailers to have a transition period.
- Wood should be accompanied with guidelines for storing and burning, both within and after any transition period.

The purpose of any transition period will be to facilitate businesses depleting their stocks of wet wood and responses indicate a transition period is appropriate.

We therefore aim to provide a transition period and will agree the duration during the development of the regulations.

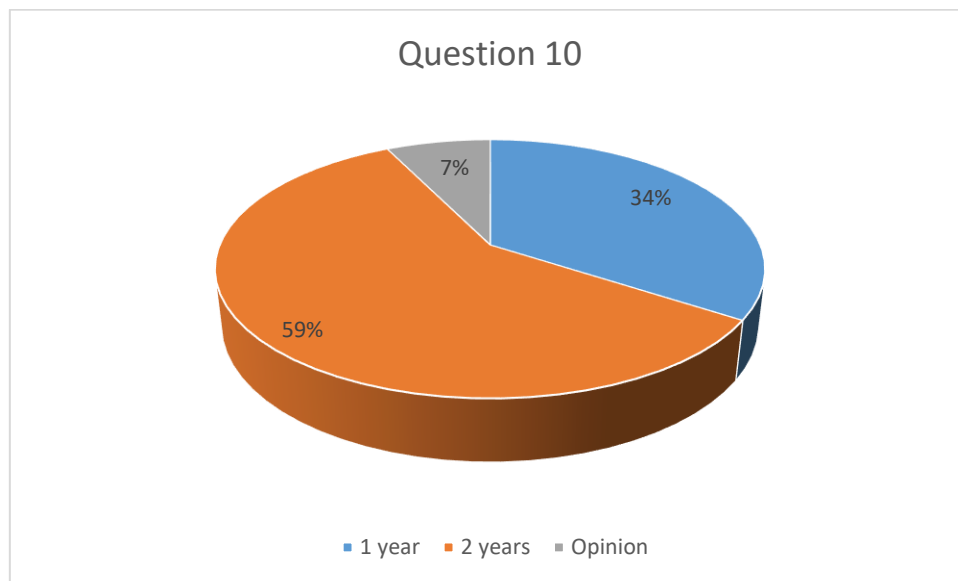
Question 10

If so, how long should any transition period be?

a) 1 year

b) 2 years

Responses submitted



82 responses were received to this question. 28 favoured a 1-year transition period, which is consistent with the period provided for small sale suppliers in England under the Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020. 48 respondents favoured a maximum of 2 years for any transition period.

Indicative quotes

“As a result of the significant impact of domestic burning of wet wood on both indoor and outdoor air quality, we recommend that the transition period is kept to an absolute minimum. We do, however, recognise that a short transition time will be required to allow the industry and individual households to use up existing stock but the transition time should be kept as short as possible and should not exceed 1 year. This will allow enough time for suppliers across Wales to adapt to the legislative change. Again, we advise that a communications campaign, to assist householders moving away from wet wood, is carried out ahead of legislative change. Such a campaign would enable the transition time to be kept to an absolute minimum.”
(Natural Resources Wales)

“Given the need to potentially cure sufficient stock and avoid supply disruption a transition period of 2 years may be appropriate.” **(Rhondda Cynon Taf County Borough Council)**

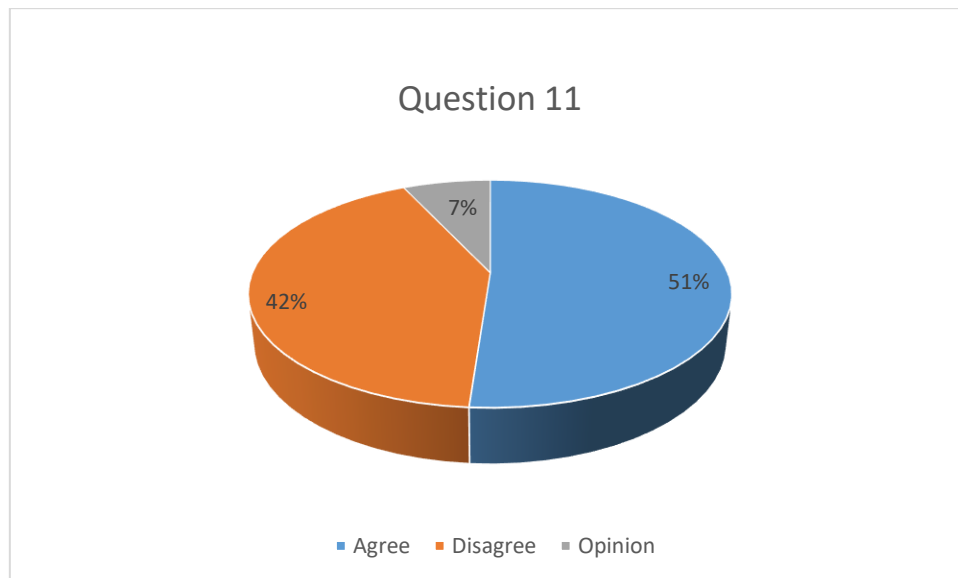
Welsh Government Response

We aim to provide a transition period and will agree the duration during the development of the regulations. We will work closely with the wood supply industry during this transition period.

Question 11

Do you agree that wood fuel suppliers should be required to be members of a certification scheme that provides assurance (via testing and auditing) that the wood is of a moisture content of 20% or less?

Responses submitted



Opinion in response to this question was more evenly split. 66 were in favour, whilst 54 felt this could be, for example, too bureaucratic or result in increased fuel costs.

Indicative Quotes

“Yes. The SIA has long supported the Woodsure “Ready to Burn” scheme and will continue to do so. This scheme has shown that it is practicable for the fuel suppliers to operate with such a certification scheme. It would not make sense to have different schemes for different countries within the UK and we would recommend that Wales also references the Woodsure “Ready to Burn” certification.” **(Stove Industry Alliance)**

“Members further expressed concern at wood fuel suppliers being required to be members of a certificate scheme to certify wood had a moisture content of 20% or less stating that this may lead to more costs. FUW members instead felt that a campaign to provide guidance to both retailers and households on how best to store both wet and dry wood to ensure it is seasoned properly would be welcomed explaining that education was important, with many holding the view that people may not be aware of the environmental or health impact.” **(Farmers’ Union of Wales)**

“Yes, but only if it does not require substantial investment or it should only apply to dedicated fuel suppliers e.g. those supplying cut logs in bags and not apply to tree

surgeons, landscape gardeners or woodland owners / farmers who might occasionally sell trailer loads of wood in bulk e.g. from woodland thinnings or overhanging trees. In this case, the emphasis must be on them to provide advice and guidance that the wood MUST only be used when properly seasoned.” **(Country Landowners Association)**

“NO. But all wood sold retail should display its maximum moisture content and storage period before use. It is then a Trading Standard issue for which regulation already exists.” **(Individual Respondent)**

“No, because a lot of people who burn wood know how to season it and it will only push up the price if it's pre-seasoned. However, I do think that wood fuel suppliers should be members of a certification scheme where it is made clear to the customer exactly how seasoned (or not) their wood is, with appropriate advice and guidance where unseasoned wood is sold. We have bought wood in the past from suppliers who said it was seasoned, but when we tested it with our moisture meter, it looked like it had been chopped down yesterday! So we just seasoned it ourselves until it was 20% or below.” **(Individual Respondent)**

Welsh Government Response

The responses favoured some form of certification that would ensure the moisture content of wood was at an appropriate level for sale in Wales. It was highlighted that any regulation would be meaningless without this. We will liaise with Defra about the possibility of aligning with their Ready to Burn scheme, which has been recognised as an authorised scheme under the Air Quality (Domestic Solid Fuels Standards) (England) Regulations 2020.

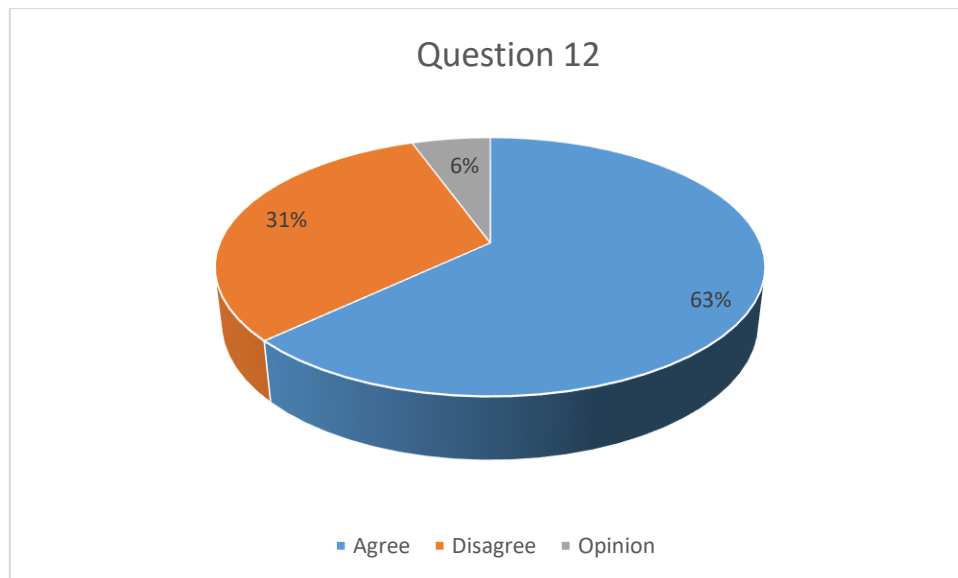
Consideration will be given to the impact any certification scheme would have on small scale suppliers. We will develop an impact assessment alongside any regulations and there will be a further opportunity for interested parties to contribute to our proposals.

Many respondents felt that a campaign is needed to provide guidance on how best to store both wet and dry wood to ensure it is seasoned properly. We will develop a campaign to accompany any regulations.

Question 12

Do you agree that retailers selling wood should be legally required to store the wood in such a way that it will maintain at least the stated moisture content?

Responses submitted



80 respondents supported this proposal, while 40 disagreed. Disagreement primarily related to the cost to retailers, with suggestions that the focus should be on informing them of the most appropriate methods of storage (off the ground, in an area which is suitably covered but sufficiently open to allow for air circulation).

Indicative Quotes

“If you mean “in such a way that the stated moisture content does not increase” then yes.” **(Individual Respondent)**.

“No. Again, impractical and a meaningless imposition on the industry if end-user clients then store wood in a way that allows moisture content to rise above this level.” **(Individual Respondent)**

“More regulation means that small farmers cannot sell wood. You are swapping low mileage supply for regulated supply with higher mileage.” **(Individual Respondent)**

“Only commercial wood fuel suppliers - but exception for private individuals/landowners/farmers.” **(Individual Respondent)**

“Yes. It would not be fair to police suppliers and then your local hardware store or garage is allowed to display it outdoors.” **(Individual Respondent)**

Welsh Government Response

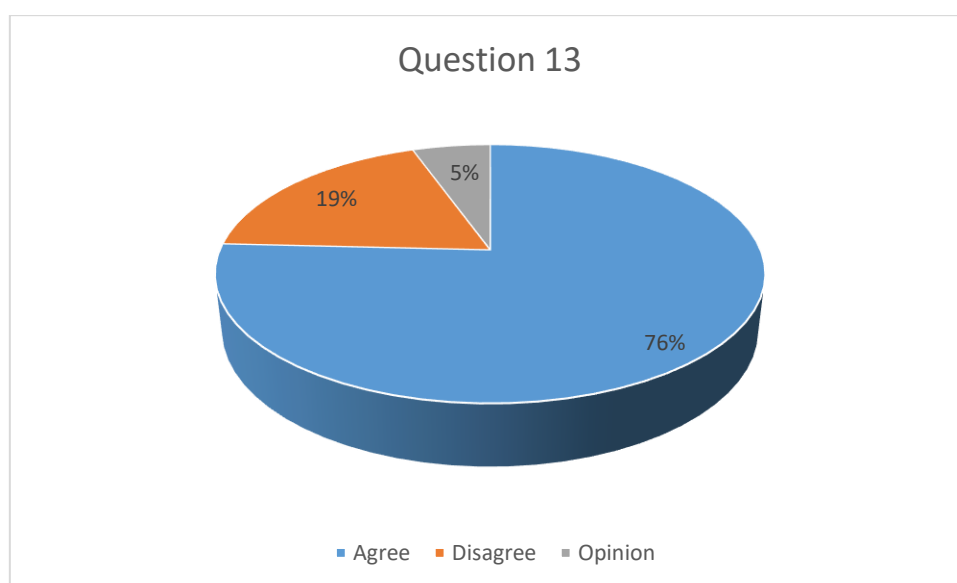
This proposal is directly related to the matter of registration and certification of suppliers. Any scheme certifying wood sales would require some form of legal enforcement and we will clarify to whom the rules apply when aligning to any certification scheme.

We will also be mindful of the potential impact of regulatory costs being passed on to households and the impact this may have on fuel poverty. We will engage further with relevant stakeholders during the development of the regulations.

Question 13

Alternatively, would you welcome a campaign to provide guidance to both retailers and households on how best to store both wet and dry wood, and how long to store to ensure it is seasoned properly?

Responses submitted



The need for information campaigns to support this initiative has been referenced before, and clearly has overwhelming support from respondents. 97 responses were in favour of an information campaign. 24 respondents disagreed with the need for education, either in relation to cost or on the basis that those who burn wood know how to store it. Of all the proposals in the consultation, this received the highest percentage of support.

Indicative quotes

“100%. Education as always been a missing factor when it comes to anything to do with burning and storing products for a consumer to know the rights and wrongs.”
(Individual Respondent)

“No, a campaign to educate the 90% that don’t burn that they should not accept 10% of people determining their air quality and long term health.” **(Individual Respondent)**

“No. I'm more than capable of working this out myself. I'm nearly 60 years old, too many people in government think the ordinary people of Wales are totally stupid.”
(Individual Respondent)

“Both certification and education are needed. A campaign would be beneficial to everybody and education is key. There is already natural ‘word of mouth’ guidance. This can be built on. Most people know that they cannot burn wet wood effectively

and dry wood burns hotter, those that purchase wood want dry wood. Wet wood would be more for the wood forager or those with space enough to season wood. Guidance on storage is much easier and faster than legislation. Utilise support organisations such as ours to help set out and disseminate guidelines.” **(Llais y Goedwig)**

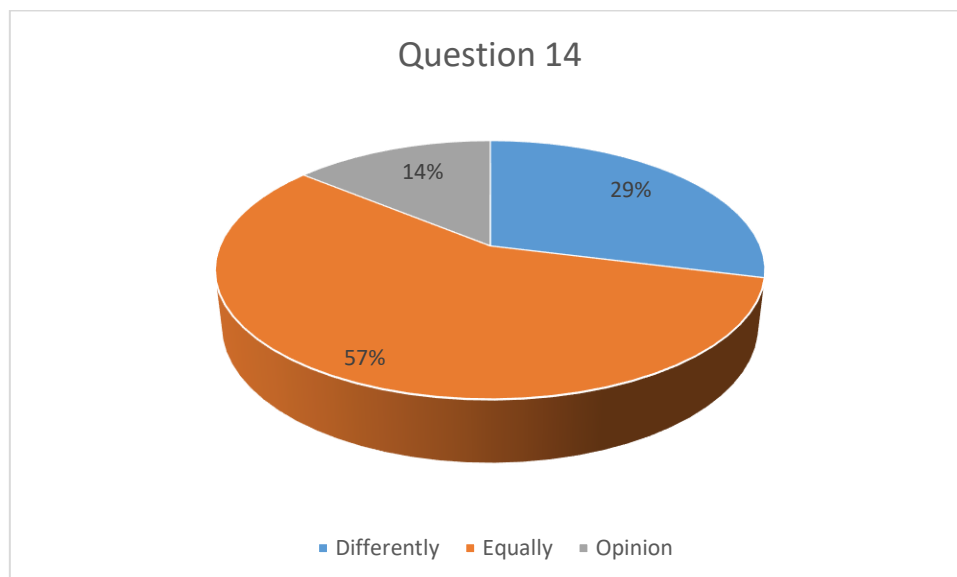
Welsh Government Response

The majority of responses favoured the proposal. We intend to collaborate with all appropriate stakeholders and delivery partners to develop an information campaign, engaging with suppliers, retailers and households.

Question 14

Do you feel Welsh Government should treat kiln dried wood differently to naturally dried wood or treat both types equally?

Responses submitted



Of the 121 responses submitted on this question, 35 thought kiln-dried and naturally seasoned wood should be treated differently. This was on the basis that energy is used to dry in the kiln, adding to CO₂ emissions, and potentially particulate emissions, depending on the fuel used to heat the kiln. 69 respondents believed that both types of wood should be treated equally.

Indicative quotes

“We recommend that all wood fuel is subject to the same legal requirements regardless of drying method. This will maximise the reduction in emissions that can be achieved. With time there may be market factors that encourage suppliers to adopt specific drying techniques due to potential increase in energy costs associated with kiln drying or land availability for natural drying techniques.” **(Natural Resources Wales)**

“No, naturally dried wood can be a quality product and may have a lower carbon footprint than kiln dried wood.” **(Coed Cymru)**

“Recommending kiln dried wood is superficially tempting, but it uses energy to dry, it is more expensive and burns faster than seasoned wood. Therefore, the overall sustainability and impact on human health is dubious, at best.” **(Pwllgor Ardal Nebo & Nasareth)**

“Both types should be treated equally - if not a preference for air dried as it doesn't use up energy in the drying process so should have a smaller carbon footprint.

“Be careful not to skew towards kiln drying as it is surely best for net zero carbon to air dry wood as far as possible and only use kilns close to sale to get it 'properly' dry? Also consider whether lower moisture contents only obtainable in a kiln can be maintained in storage in the humid, cool weather in Wales. There is no point drying beyond what can be maintained in covered outdoor storage conditions.” **(Wild Resources Ltd.)**

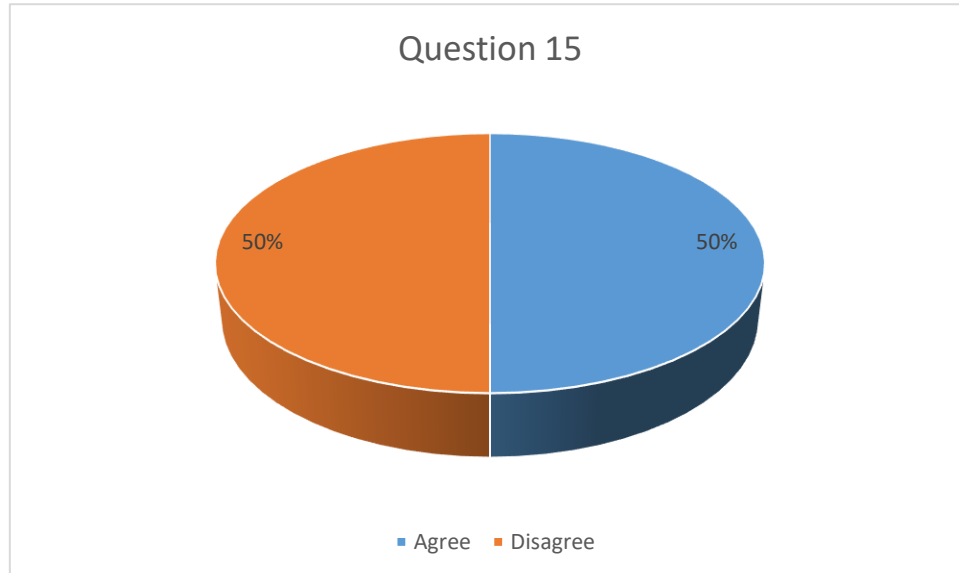
“WAG could accept 25% as a persistent industry standard for naturally dried wood where additional evidence of stewardship of natural resources or well-being are established. Kiln dried woodfuel could be permitted at 20% without such assurances.” **(National Coppice Federation)**

Welsh Government Response

We will take the responses into consideration with Defra and the other administrations to establish consensus and a way forward.

Question 15

Should the sale of wet wood to domestic properties be treated differently in rural as opposed to urban settings?



Responses submitted

The proportion of responses in favour of treating rural settings differently and those against was evenly split, with 56 in favour and 56 disagreeing.

Indicative quotes

“Members welcomed the fact that Welsh Government have considered potential mitigating actions for vulnerable groups, including those living in fuel poverty. Given that the households reliant on solid fuel for heating are predominantly in rural areas where alternatives are not readily available members felt that the sale of wet wood should be treated differently in rural areas, compared to urban settings, though acknowledged that this would be hard to regulate.” **(Farmers’ Union of Wales)**

“No, this is again open to abuse especially from small odd jobbing suppliers who cut down a tree today (possible illegal felling) and sell as firewood logs tomorrow.” **(D. J. Davies Fuels Ltd.)**

“Yes. Rural will have a greater chance of both knowing how to dry wood and how to correctly store it. Urban far less likely and that is where you have the greatest concentration of burning for aesthetic reasons rather than heating.” **(Individual Respondent)**

Welsh Government Response

We do not propose to apply any restrictions on sale by geographic location, based on the response to the consultation. We know that adverse health effects occur from exposure to PM_{2.5}, irrespective of location and we wish to protect all communities in Wales. We will apply a consistent approach across Wales to give clarity and avoid confusion on where and when any regulations apply. We will support any restrictions with clear guidance for seasoning and burning wood to minimise the impact on the local air quality.

Question 16

If you are a supplier/retailer, how would these proposals affect your business?

Responses submitted

25 responses were provided to this question, predominantly from businesses that would be affected. These businesses provided insight and advice as to the potential effects, and possible solutions.

Indicative quotes

“As a supplier the onus will be on ensuring quality control procedures are in place to ensure the supply of the correct moisture content. There will be some additional costs of certification and labelling. As a retailer correct storage would be needed and ideally a moisture meter to ensure that the correct moisture content was being sold. Retailers will also need clear messaging to explain the new regulations to the public and a Government backed education programme will help this.” **(Stove Industry Alliance)**

As retailers, we would welcome clarification from the Government on their expectation for retailers to ensure that wood in volumes under is dried to below 20% moisture. Would this require the retailer to ensure that they had stored the wood in such a way that it will not become wet, or would it require the retailer to measure that the wood is dried to below 20% moisture? The Government should also clarify what would count as due diligence. For example, if a retailer purchases wood from a wholesaler which confirms that it is below the 20% moisture level, but an inspection takes place at the retailer’s site and it is not below 20%, would the retailer or the wholesaler be liable? We have concerns that placing this requirement will place financial burdens on retailers either from having to purchase equipment to measure the moisture in the wood or having to contract an auditor to measure the moisture in the wood. Instead, we believe that the supplier should ensure that wood can meet the moisture requirements throughout the supply chain, for example, by considering the material it is packaged in to protect it from moisture.” **(Association of Convenience Stores)**

“The Woodland Trust supplies wood from its estate, some of which is used for firewood, through formal and informal supply arrangements, through third parties, or direct to consumers. The Trust is unlikely to be willing to provide on-site storage for timber seasoning, so the obligation would fall on those purchasing the wood. There may be a reduction in the number of people willing to source firewood from the Woodland Trust. This illustrates the disincentive these measures may have for the management of woodlands.” **(Coed Cymru)**

“The issue we would have if we was made to be certified as a supplier of ready to burn wood as we buy from a wholesale. Also with the banning of bituminous coal

coming into effect that the need for more logs will be inevitable and having to have more under cover units erected which means planning permission and more funding needed to be found to do the necessary requirements.” **(Individual respondent)**

Any regulation and expensive registration would kill our small scale wood selling business. We sell local, v low carbon footprint well-seasoned timber. We have no slack for registration expenses.” **(Individual Respondent)**

“Responding as a membership organisation that includes businesses processing and retailing firewood, this legislation could serious impact on the future of those businesses. The processing and supply of wet wood in rural areas is part of the business supply chain and not all businesses have the capacity to store and dry all of the firewood they process. For a domestic property 2m³ of storage is a considerable requirement so it is important that the threshold be set at an appropriate level. We consider this to be 0.5m³.” **(Confor)**

“Many of our 500+ members are suppliers. They are mostly woodland managers operating practices proved to be sustainable over millenia in these islands – see construction here - https://en.wikipedia.org/wiki/Sweet_Track. The COVID crisis is delivering a pulse of workers into the landscape who are apt to work with us in applying some of the most attentive woodland practices to the landscape. Rather than gearing up to accommodate enlarged workforces, our most substantial members are fearing they are likely to lay off staff because of the disturbance to woodfuel trade caused by such developments in England.

Obliging suppliers of less than 2m³ to be certified before they can supply is hard on the smallest suppliers. The current individual certification offered by HETAS for their Ready to Burn Scheme is £400 in the first year and £300 per year thereafter. It’s not clear that all small woodland managers could afford this. Some woodland management is only just about viable because of the returns from woodfuel where no other income is as yet available e.g. thinning after new planting and returning over-stood coppice to a regular cycle. Is this the moment in history to make these practices less economically viable?” **(National Coppice Federation)**

Welsh Government Response

We will engage further with relevant stakeholders to ensure any regulation of the sale of wood is managed in a way that is sensitive to the needs of business, whilst preventing potential harm caused by the storing and burning wood inappropriately. We will also be mindful of the potential impact of regulatory costs being passed on to households and the impact this may have on fuel poverty.

Question 17

What support might you require to make these adjustments?

Responses submitted

30 respondents expressed an opinion. Responses received were predominantly from affected businesses.

Indicative quotes

“Large covered dry storage is required to keep dried wood dry. Industry requires support badly to ensure that product is kept and maintained in the dry condition required by legislation and to meet seasonal peaks in demand.” **(D. J. Davies Fuels Ltd.)**

“To avoid the risk of disincentivising the management of small woods may require providing support for the small woods sector through conservation management grants and timber business investment grants. Small community and private woodland owners, woodland managers and firewood re-sellers may need support in providing space and facilities for the seasoning of timber. Facilities may include polytunnels/buildings for solar drying (passive and active) and kilns for forced drying. Issues include capital costs for boilers, kilns, dehumidifiers; moisture content monitoring costs, and on-going maintenance costs.

Most existing legitimate users have learnt by experience. Support should be considered for establishing producer hubs/group schemes that would bring together small suppliers. The sale of unseasoned timber for customers to season at home is a much simpler transaction that requires contractors to have fewer facilities.” **(Coed Cymru)**

“Time and financial incentives to implement storage facilities, guidance notes or similar advice should be freely available so they can be handed out to consumers in an appropriate form.” **(Country Landowners Association)**

“Business innovation and supply chain investment grants to support SME's developing their business would be an effective manner of support.” **(Confor)**

Welsh Government Response

Please see response to question 16.

Question 18

If you have any further comments or suggestions on this section, please provide them here.

Responses submitted

52 responses provided further comment on the proposals on restricting the sale of wet wood. These ranged from comments on changing behaviours, changing the focus from the fuels to the activity of burning, and also providing comparisons to other fuel types in any awareness campaigns.

Indicative Quotes

“Everyone needs some time to change the way they do things. Most people have real serious financial concerns at every stage of this really huge undertaking. One Size - really does NOT fit all - you need to prepare for some variations to help people change their way of life and their business/ domestic concerns.” **(Individual Respondent)**

“A significant amount of people use wood fuel across Wales and an outright ban would have a large impact on many people. It is also very difficult to regulate. Taking clear, simple steps to improve the quality of fuels burned is the first logical step in reducing pollution. This will also allow the impact on air quality to be monitored to assess whether the improvements are realised. We suggest that behavioural change initiatives could be useful in moving people away from the reliance on domestic burning of solid fuel as a heat source. Such initiatives should include awareness campaigns of the impact of domestic wood burning on air quality inside and outside the home and its impact on health. Existing evidence on air quality impacts and health information from Public Health Wales would be useful sources of information for such initiatives. It may also be appropriate to consider financial incentives to encourage householders to move away from domestic burning of solid fuel.” **(Natural Resources Wales)**

“The CLA is very supportive of the proposal to increase tree cover in Wales but in order to do this there will have to be a strong element of commercial thinking to encourage delivery- particularly as Covid-19 has affected public finances and will continue to be so in the near future. Landowners and associated businesses are supportive of the biodiversity and climate change benefits of increased woodland and forestry, but in order to ensure these are maintained effectively in the future there will need to be some commercial benefit. The production of firewood and timber from such areas can provide this and therefore should be encouraged. The rural environment is very different to the urban environment and smoke free zones or similar are important but should be considered differently outside of urban centres.” **(Country Landowners Association)**

“Firstly, I do not agree with the use of wood burners. The rules, restrictions etc should be very strict as many wood burner users often light their burners for "effect", "ambience" etc. Many, from my experience, use them on very, very, warm sunny days, so with the heat from the weather combined with the stench from the smoke, it is just not acceptable, as people open their windows for fresh air, but the only air that enters is the stench from the smoke. Regardless of "high end" burners, "low combustion" etc, PM_{2.5} particles are released as soon as the chimneys emit it's smoke, this in turn enters resident's homes and is inhaled and the future damage this does to the lungs, respiratory system and mental health, is just not acceptable and a damage to health.” **(Individual Respondent)**

“I strongly advocate and support information being made available to the public on how to store fuels and to create optimum burning which by itself will reduce emissions. A fuels accreditation scheme that mirrors what is to be implemented in England in May 2021. To have a Welsh scheme or rules different to England would be a disaster for industry and create unnecessary cost burden.” **(D. J. Davies Fuels Ltd.)**

Welsh Government Response

Key themes that emerged from responses were:

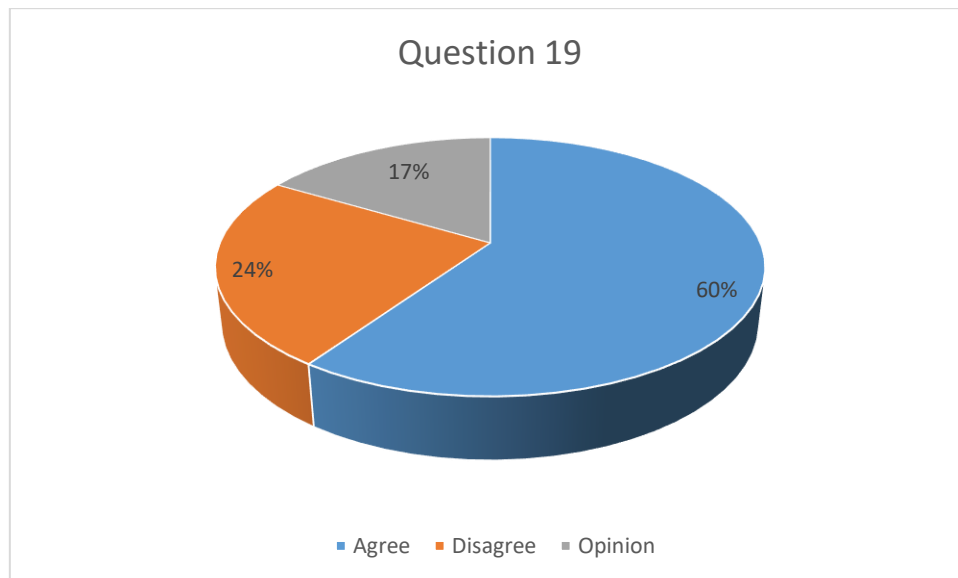
- Welsh Government should spread the message that people should only burn solid fuels if they have no other alternative.
- Financial incentives are needed to allow people to transition away from solid fuel burning.
- Support for an awareness raising campaign to explain the dangers of poor storage and burning practices.

We acknowledge the need to raise awareness of the impacts of solid fuel burning, particularly within urban communities. We will develop communications to support householders in their transition to cleaner fuels.

Question 19

Do you agree that we should introduce a standard for all manufactured mineral solid fuels which confirms they are below 2% sulphur and meet a smoke emissions limit of 5g/hr?

Responses submitted



109 responses were provided for this question. 65 supported the concept, whilst 26 disagreed, and 11 provided further opinion.

Indicative quotes

“We agree that a standard for all manufactured mineral solid fuels should be introduced as this would improve air quality by reducing both sulphur dioxide and particulate (dust) emissions. These standards should be applicable for all sales of manufactured mineral solid fuels for domestic burning across Wales and not be limited to combustion within a Smoke Control Area.” **(Natural Resources Wales)**

“The Defra appointed governing body Hetas/Woodsure cannot effectively manage a scheme if devolved nations set different standards. Our company supplies fuels nationwide and to several companies which have outlets in England, Wales and Scotland where a single product range is required. WAG cannot administer nationalistic pride just for the sake of having the ability to set different rules in Wales. Common sense is required to attain a level playing field across all nations in the UK.” **(D. J. Davies Fuels Ltd.)**

Welsh Government Response

We will work collaboratively with UK Government and other administrations to ensure, where possible, consistent standards are in place across the UK. There was some concern that reducing the sulphur content of manufactured solid fuels would increase the cost of these products. However, there was broad support from industry who already provide these fuels to homes in England.

Given the support for this intervention, we intend to develop regulations to apply this standard to all fuels used in a domestic setting.

Question 20

In order to comply with any proposal to apply sulphur and smoke emissions standards to all manufactured mineral solid fuels, what adjustment, if any, would your business need to make?

Responses submitted

20 respondents provided further comment on this aspect and were broadly supportive. Several respondents made reference to either the changes they have made to their business practices over several years or changing customer preferences for solid fuels.

Indicative quotes

“None for sulphur levels because as a company we do not purchase or support the use of high sulphur fuels. We have a subsidiary stove shop, stove installation and maintenance business and have seen at first hand the damage that high sulphur fuels has had on appliances and chimneys. Further support for development is required to increase the range of clean fuels, the point I raised in Q19 on current fringe and new fuels is still valid.” **(D. J. Davies Fuels Ltd.)**

“I would make sure that all the solid fuel I buy is DEFRA approved. The last thing I would like to say as I have already said, is the Government also DEFRA etc. have been trying to stop coal of all types for years. With house coal I just can't see why they just don't wait because there is not going to be anywhere before long where you will be able to buy it. I drop my price in the summer so as to let people stock up while it is cheaper. It keeps myself and my staff in work all the year round but for the last 2 years the price on house coal has not come down in May. It has gone £20 to £30 a ton up higher in the September and the reason house coal is running out is a shortage of it, so now you can see why I said DEFRA has to wait as we won't be able to get it to sell soon. I think they should stop selling wet wood as soon as possible.” **(J. W. Collins & Son)**

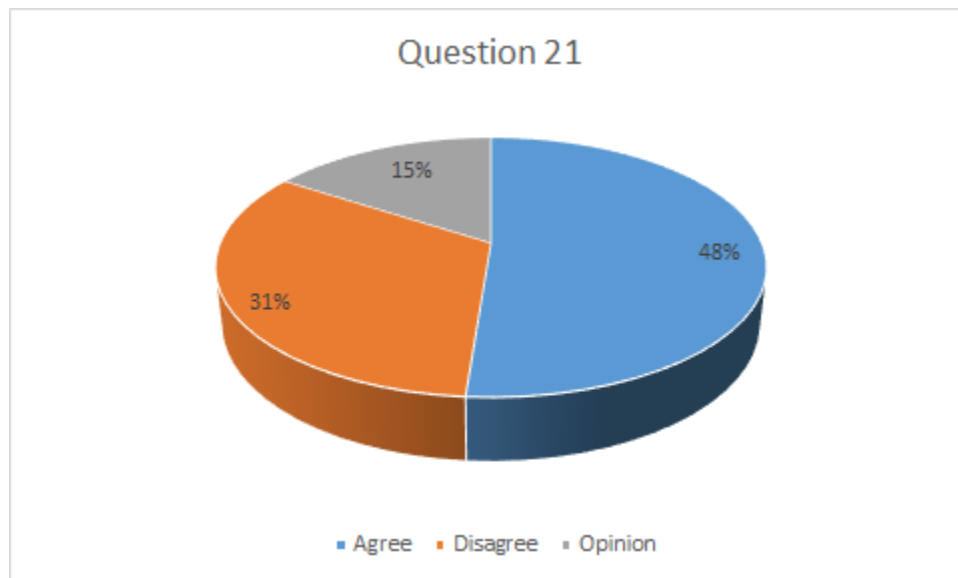
Welsh Government Response

The standard is already in force in England and Northern Ireland, and is being proposed in Scotland. With the support of industry, we will introduce this standard in Wales and work together to bring forward regulations.

Question 21

Would you agree that the Welsh Government should seek to endorse the Sustainable Fuel Register, or seek to adopt a similar scheme, for application in Wales?

Responses submitted



6% of the responses were unclear

Of the responses received, 42 agreed with the proposal that Welsh Government endorse this scheme to register non-wood biomass fuels as sustainably sourced. 27 respondents disagreed with the proposal, principally in relation to additional levels of bureaucracy.

Indicative quotes

“We believe that WG should explore the use of SFR in Wales and actively encourage applications from Welsh manufacturers if appropriate to do so. We note that currently the SFR only assesses the fuels in relation to reducing greenhouse gas emissions. Any scheme in Wales should also consider the impact on other pollutants.” **(Natural Resources Wales)**

“No. There is no such thing as sustainable solid fuels. It all emits CO₂, and it all emits harmful pollution, therefore in both tackling air pollution and the wider picture of tackling climate change, you should be working towards and set a date for a ban on solid fuel burning. It is absolutely madness to set a date for the end of domestic gas boilers, yet allow solid fuel burning to continue unabated with no end date in sight.” **(Individual Respondent)**

“We believe that a scheme that improves the control and regulation of fuels and importantly their sustainability is a good thing. We would support the adoption of the SFR in Wales. Consistency across the UK countries will ensure a quicker and wider take-up and endorsement by industry.” **(Stove Industry Alliance)**

Welsh Government Response

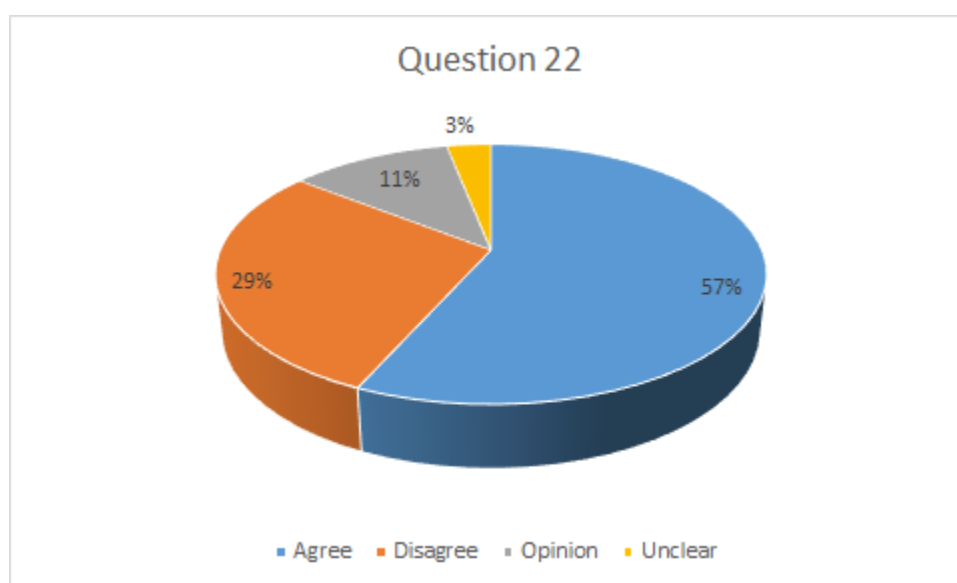
Although there appeared to be support for this proposal, many of the comments received highlighted a need for further investigation before endorsing a scheme such as the Sustainable Fuel Register. The most common themes were:

- the cost of registration for suppliers which would inevitable be passed onto the customer.
- particulate matter emission limits for biomass fuels should be added to the current Sustainable Fuel Register.
- Welsh Government should focus on an information campaign instead.

Question 22

Would you agree that any registration scheme for manufactured biomass solid fuels covering Wales should be expanded to include testing and certification for PM and other emissions?

Responses submitted



55 respondents agreed with this proposal, with 28 disagreeing.

Indicative quotes

“We support that any registration scheme should be expanded to include testing and certification for particulates (dust) as well as other emissions such as nitrogen oxides and sulphur dioxide.” **(Natural Resources Wales)**

“Yes. HAC would agree with this as biomass burning is a source of health harming pollutants and creates particulate matter in a similar way to traffic. Therefore, as with wet wood and bituminous coal, the manufacture and sale of biomass solid fuels must be regulated.” **(Healthy Air Cymru)**

“Biomass fuel should be tested for Pm2.5 emissions using the same standards and testing methods as fossil fuels. More refined tests for biomass fuel may be developed but it is essential that no fuels are exempted. All testing could be extended to cover NOx and possibly trace elements. CPL has tested over 120 biomass materials and has found that all are low in sulphur (0.2% raw and c 0.3% when pyrolysed) and very few have significant trace element contents (appendix 5). Some biomass sources (coffee grounds) are reported by others as being high in nitrogen leading to NOx emissions.” **(CPL Industries Ltd.)**

“No - all these registrations etc. push up the price of the fuel. I use smokeless, low sulfur manufactured fuels, which are not approved for smoke control areas (I do not

live in one) But the only reason they are not approved for the smoke control areas is simply they have not been tested and registered. You can tell if a fuel is high in sulfur - you can taste it in the air.” **(Individual Respondent)**

Welsh Government Response

We will work with UK Government and other administrations to consider amendment of the requirements of such a scheme to address Particulate Matter alongside CO₂ and other emissions.

Question 23

If you have any further comments or suggestions on the sections on manufactured fuels, please provide them here.

Responses submitted

29 respondents provided further comments in relation to manufactured fuels and associated topics.

Indicative quotes

“We have as a family looked at a lot of ways to heat more successfully our period property - the Alternative Energy sources are a Minefield! They all seem to be very expensive - and very difficult to find appropriately local suppliers. We really need a key register of qualified and economically viable suppliers of goods and services.”
(Individual Respondent)

“Currently, a significant amount of manufactured biomass fuels such as compressed heat logs are being imported from other countries such as Latvia and Estonia. Importing fuel generates additional pollution as a result of the long transport routes. There may be an opportunity to develop the manufacture of such logs as a new industry in Wales. Compressed heat logs typically have a very low moisture content of between 6% and 8% and as a result burn with minimal particulate emissions. Consideration needs to be given to control of other aspects of wood used as fuel other than percentage humidity. Waste wood, for example old window frames, are used in many households as a source of fuel. Burning of waste wood produces a greater volume and range of harmful pollutants. Consideration should be given to assessing parameters other than moisture content as part of the development of a registration scheme for suppliers and distributors.” **(Natural Resources Wales)**

“This sector has much potential for Welsh companies, however new products are costly to develop and create, and requires support to develop innovation. Government support could support new jobs and opportunities for Wales.” **(D. J. Davies Fuels Ltd.)**

“There is a need to develop (if possible) a UK wide testing and certification for biomass fuels. This needs to encompass the testing and standards discussed above with standards for waste derived fuels and these are emerging and provide a clearly renewable source of fuels providing standards for trace elements etc. are achieved. If Welsh government could provide initiatives and pressure to bring such discussions forwards through consultation with DEFRA, Scottish government and industry this would close a potential loop hole between the devolved authorities and provide a clear direction for industry and hence a basis for investment in renewable smokeless fuels.” **(CPL Industries Ltd.)**

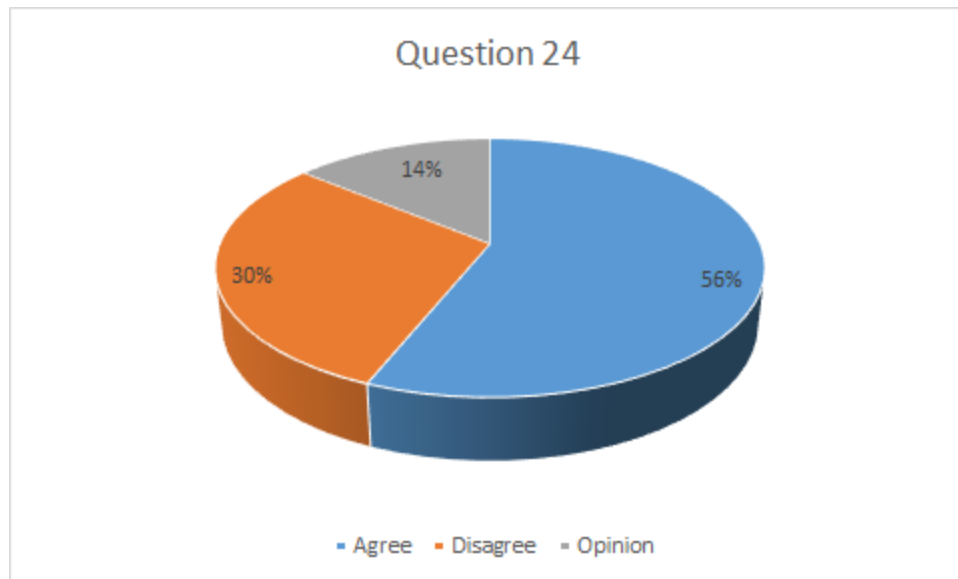
Welsh Government Response

We thank all respondents for their comments and will consider them going forward.

Question 24

Accepting that regular maintenance by qualified professionals improves the efficiency of any appliances, do you agree that an appropriately qualified technician (installers, service engineers and sweeps) should be trained and certified to enable them to give environmental guidance and condemn dangerous appliances?

Responses submitted



64 respondents agreed with this proposal, with 34 disagreeing and 16 providing an opinion which was not directly attributable to the question.

Indicative quotes

“We support proposals to ensure regular maintenance is carried out on all aspects of the operation of combustion process. Poorly maintained combustion appliances can give rise to Carbon Monoxide exposure to residents leading to acute and chronic health impacts. Care will be required to prevent the unintended consequence of less maintenance where occupants fear their appliance could be condemned.” **(Public Health Wales)**

“No, the initial proviso is entirely wrong. Cleaning a chimney is a demanding but not a complicated task. It can be conducted ineffectively by a paid and qualified contractor and it can be conducted effectively by myself - an unpaid individual with no formal qualifications in the cleaning of a chimney. Payment to the contractor for a service that cannot be inspected or quality assured by the purchaser does not mean that it has been carried out effectively. I would much prefer to continue to sweep my own chimney as I have done for the last 20 years. If others want to pay for this service they should be entirely free to do so. While I greatly applaud the intent of this suggestion – there are undoubtedly any number of brand new wood burning stoves installed into unprepared and partially blocked chimneys, I would suggest

legislation preventing an individual householder sweeping his own chimney is a step too far.” **(Individual Respondent)**

“Not really. Guidance yes but most sweeps will already flag issues with a stove and you would be stupid to continue to use it - but people drink & drive and don't wear a seatbelt. It was education and social pressure not laws which has reduced the number of people doing both acts of idiocy.” **(Anonymous Respondent)**

“I recommend customers have their chimney swept at least once a year, I would endorse a recommendation by the Welsh Government that solid fuel users have their chimney swept and appliance inspected by the sweep at least once a year.” **(R. J. Hayes & Son)**

“As an aspiration this sounds ideal - again it will disadvantage the less well-off unless there is support for those on low incomes or towards the cost of replacing old and dangerous appliances.” **(Llais y Goedwig)**

Welsh Government Response

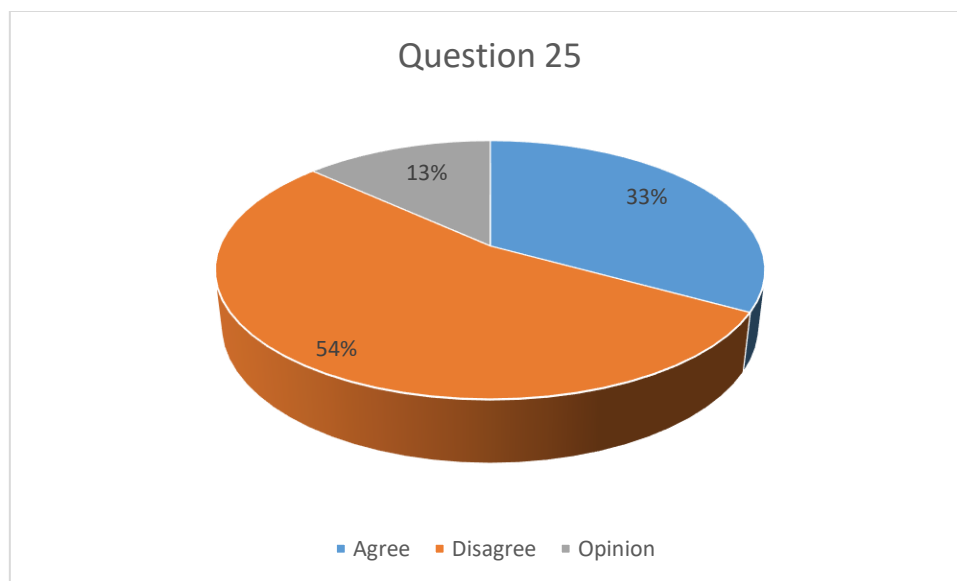
Although there was support for this proposal, responses to this question highlighted that certification would add costs which would likely be passed on to customers. Increased costs could lead to some households not undertaking maintenance.

We intend to develop a communications campaign to demonstrate best practice for solid fuel use and this will include the importance of regular maintenance by a trained professional.

Question 25

In regions of France a chimney must be swept annually by a registered and qualified sweep otherwise in the event of a fire caused by the stove the home insurance will not be valid. Would you agree that this approach should be adopted in Wales?

Responses submitted



65 respondents disagreed and 40 agreed with this proposal. 16 respondents provided an opinion as part of their contribution.

Indicative quote

“We advise that guidance is produced for stove owners in relation to chimney sweeping rather than at this stage requiring an annual chimney sweep by a registered and qualified sweep. It may be appropriate to gather data on incidents of fire that have been caused by domestic stoves in the UK to inform considerations on whether Wales should adopt a system similar to that in France in future.” **(Natural Resources Wales)**

“Yes and why not, this is a condition that could set Wales apart and would not impact on nationwide product and packaging requirements.” **(D. J. Davies Fuels Ltd.)**

“While we can see the benefits of this we prefer that this is on a best practice approach and is undertaken because individual households / landlords can see the reasons why this should take place. Some houses might only use their fire a couple of times a years and for others it is in full time use resulting in a range of time intervals between sweeping.” **(Country Landowners Association)**

“No as some fireplaces may only be used once or twice a year.” **(Individual Respondent)**

“It isn't always relevant for every chimney to be swept annually, better advice should however be available to make households aware of the need for regular sweeping and the benefits.” **(Individual Respondent)**

Welsh Government Response

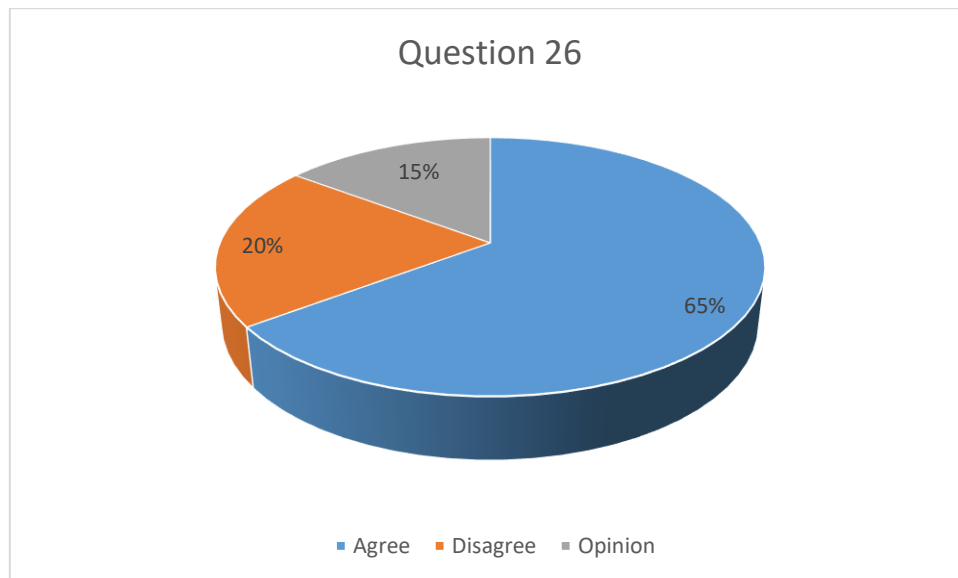
Insurance services are not devolved to Wales and any initiative such as the regular maintenance of appliances and chimneys as a condition of household insurance would need to be introduced by UK Government.

We strongly advocate regular maintenance of appliances and chimneys and will provide guidance on safe ways of doing this.

Question 26

Would you consider some form of scrappage scheme to be an appropriate method to encourage the replacement of inefficient appliances currently in use?

Responses submitted



Of the 114 clear responses provided, nearly two thirds supported the concept of some form of scrappage scheme.

Indicative quotes

“Modern stoves are more efficient therefore consume less fuel and emit more heat which equals less emissions to atmosphere. However in my opinion scrappage schemes have had mixed reviews on their effectiveness.” **(D. J. Davies Fuels Ltd.)**

“It would be perverse to use public taxpayers' money to run a program replacing solid fuel burning with the funding of clean electric heating to clean up the air and decarbonise yet continue to allow stoves to be installed elsewhere as lifestyle accessories for use in lieu of cleaner alternatives. Stove exchange/scrappage programs from around the world have consistently produced results to show that they simply do not work. The main reason being that just like diesel cars, real world emissions are far higher than testing and certification results.” **(Individual Respondent)**

“FUW members felt that a scrappage scheme, or incentive scheme would be an appropriate method to encourage the replacement of inefficient appliances currently in use, stating that this should start by being limited to households where the burning of solid fuels is the primary heat source. Members were encouraged to read this has worked well in other countries.” **(Farmers Union of Wales)**

“Yes but it should be open to all types of burner and people in all situations. It should not be restricted to target areas or socio-economic groups - Climate Change is a wider issue.” **(Broad Oak and Gilar Farm)**

Welsh Government Response

Any action we take with regard to scrappage or upgrading of existing heating appliances would be undertaken in conjunction with action to address the Climate Emergency. The Climate Change Committee has recommended gas and oil heating should be phased out within the next 15 years.

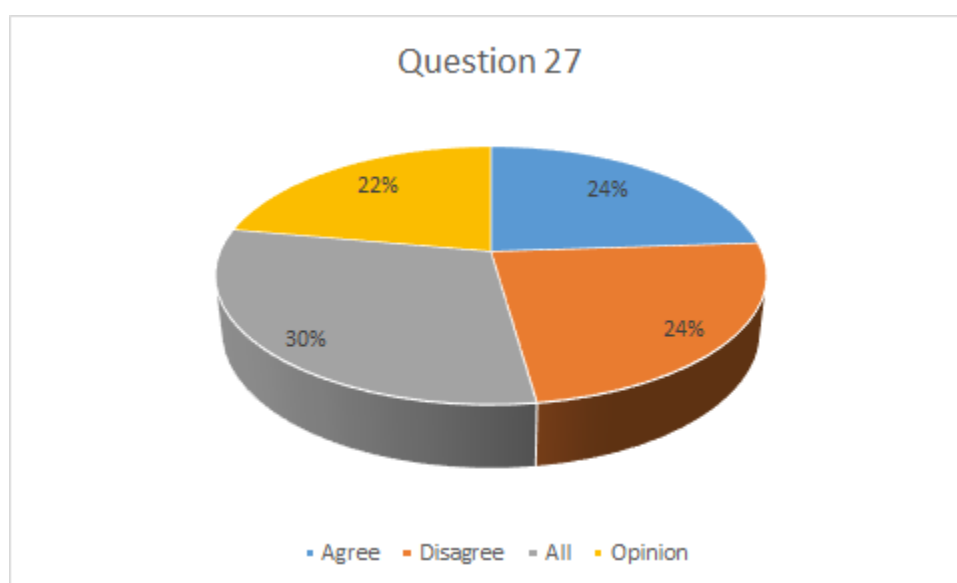
We will continue to explore options for supporting households to improve the efficiency of their heating systems and will work in conjunction with stakeholders including UK government, the Climate Change Committee, National Grid and gas and electricity suppliers to ensure solutions are resilient, sustainable, fit for purpose and cost effective.

Our ‘Heat Strategy for Wales’ supports the need for enabling actions to provide homeowners with advice and support for the transition to low carbon heat. Along with other initiatives within the strategy, we propose to prioritise low carbon heat as part of the next iteration of the Warm Homes Programme to support households in fuel poverty in owner-occupied and private rented homes.

Question 27

Should any scrappage scheme be limited to households where the burning of solid fuels is the primary heat source or should this be expanded to encourage people to use non-carbon heating?

Responses submitted



27 respondents felt that scrappage schemes should be limited to those who use solid fuels as a primary heat source. 27 disagreed with the concept, and 34 felt that any scrappage scheme should be available to all, principally as a mechanism to move households to more carbon neutral sources of heating.

Indicative quotes

“It should be available for all households but in a percentage scheme. The more dependant the householder relies on their primary heat source the more percentage they get.” **(Individual Respondent)**

“Any scheme should be focused on areas with the poorest air quality, greatest deprivation and the largest emitters. This approach would see the greatest benefit to health.” **(Public Health Wales)**

“This depends entirely on the money available for such a scheme. The priority for any scheme must be to support those who live in fuel poverty and are burning wood because they can't afford to move to greener forms of energy. Given that people in fuel poverty are also likely to suffer other health inequalities then it's particularly important that Welsh Government helps those living in fuel poverty to move away from domestic burning and towards more healthy, greener forms of heating.” **(Healthy Air Cymru)**

“Scrap and appropriately replace could form a useful element of the conversion programme – the design of such an approach should ensure once only replacement i.e. avoiding moving from a high carbon solid fuel to a lower carbon solid fuel.”
(Active Building Centre)

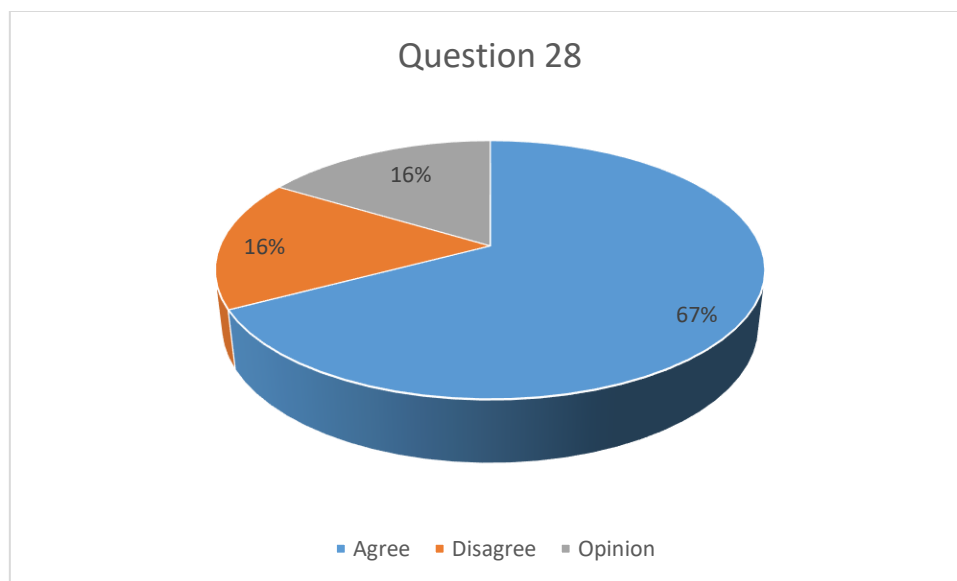
Welsh Government Response

Please see response to question 26.

Question 28

While it is presently outside the scope of the Welsh Government to set taxation rates would you support a proposal to explore a lower VAT rate on domestic fire and stove maintenance to encourage householders to maintain their appliances regularly?

Responses submitted



78 respondents supported this concept and 19 disagreed.

Indicative quotes

“No, I think they need to view this as a necessary expense if they are going to run some sort of fire or stove, and I think it should be made a legal requirement to have them swept/serviced annually. If anything they should be raised, to discourage people from having them.” **(Individual Respondent)**

“No. This should be considered as a necessary expense and not to explore a lower VAT rate. The appliances should be swept/serviced etc. twice yearly.” **(Individual Respondent)**

“Anything that encourages people to behave sensibly and safely about maintaining appliances - MOT anyone?” **(Individual Respondent)**

“The lowering of VAT rate on domestic fire and stove maintenance may encourage good maintenance by enabling costs to be minimised. However, we would suggest that the main driver for improvement in air quality should be via education and behavioural change initiatives to move householders towards other ways of heating their homes.” **(Natural Resources Wales)**

Welsh Government Response

A number of respondents highlighted that lower VAT rates might actually encourage installation of wood burners. This unintended consequence would be counter-productive to our policy ambition to transition to low-carbon, more efficient heating sources.

We will therefore not be taking forward this proposal.

Question 29

Do you have a preference for any of the options for supporting households to change, outlined above?

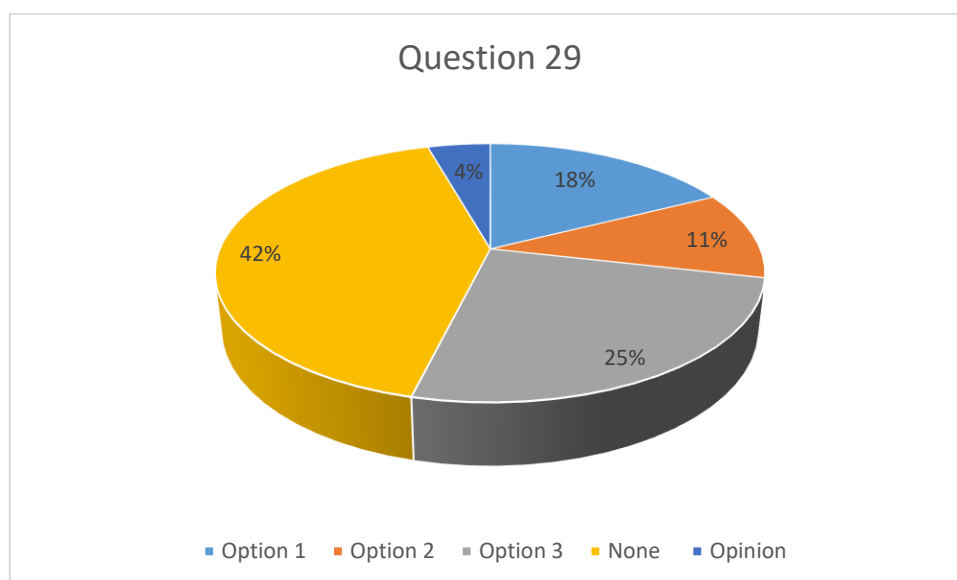
a) Option 1 (Voluntary scrappage scheme)

b) Option 2 (Mandatory scheme to replace old and non-Eco-design compliant appliances)

c) Option 3 (Voluntary scrappage scheme alongside an expansion of Smoke Control Areas)

d) None of those proposed

Responses submitted



Of the respondents who expressed a preference, 16 chose Option 1, 10 selected option 2, and 23 respondents felt option 3 most appropriate. 38 respondents were not in favour of any of the options provided. Whilst a reasoning was requested in the consultation document, regrettably due to a flaw in the online questionnaire this was not possible. Opinions reflecting this selection are drawn from email responses only.

Indicative quotes

“Scrappage schemes in this field are inappropriate. These are issues for the individual householder or landlord. By all means legislate to stop the sale of polluting fuels but to ask the public to pay to resolve the issues of an individual is unfair. The wealthy, who had least need to be supported, bought new cars and were the principle beneficiaries of the car scrappage schemes. New landlords or owners of homes will purchase with a discount based on an outmoded heating system. Why

should their refurbishment of their property be funded by us all?" **(Individual Respondent)**

"None of the above, all of the above options are complicated and discriminate in favour of heat source systems, we have seen during the recent cold weather extra demand for all types of solid fuel and wood where consumers with new renewable heating systems not being able to sufficiently heat their homes as air temperatures were too low, power lines down, reliance for heating then reverts to the faithful stove with fuel in reserve in the shed which no one or any weather can cut off. I travel widely and it still amazes me on how remote and rural some properties and communities are located in Wales." **(D. J. Davies Fuels Ltd.)**

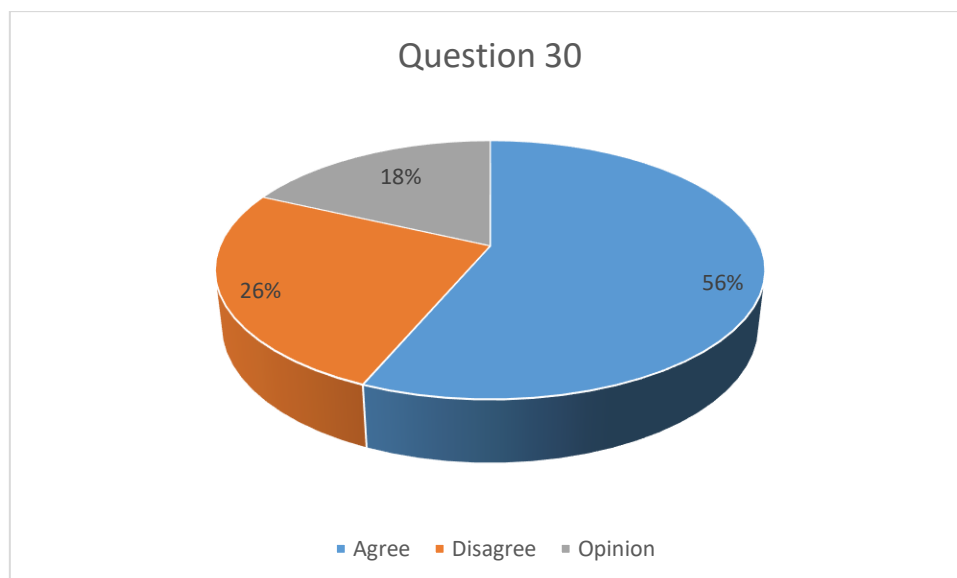
Welsh Government Response

As outlined in response to question 26, proposals to support households in the transition to low-carbon heating sources, will be captured in the 'Heat Strategy for Wales'.

Question 30

Would you agree that the coverage of smoke control areas (SCAs) should increase in order to better manage emissions from domestic burning?

Responses submitted



53 respondents agreed that the use of Smoke Control Areas should be encouraged on the part of local authorities in Wales. 24 respondents disagreed.

Indicative quotes

“Smoke Control Areas are one mechanism for controlling emissions from domestic combustion, however, as currently enacted they are not resulting in an appropriate reduction in emissions to ensure compliance with air quality standards. In addition to any changes to coverage of SCA, consideration should be given to including support for enforcement. SCA’s should also consider deprivation (health effects) and fuel poverty (unintended consequences).” **(Public Health Wales)**

“The current SCA scheme is a joke as no one can produce a plan of where they are exactly located. The current proposals for fuels and appliances complies with the SCA conditions, so why have another layer of confusing bureaucracy.” **(D. J. Davies Fuels Ltd.)**

“No. Increasing the coverage of SCAs would have little impact on emissions from domestic burning as enforcement is challenging. As stated in the consultation, whilst the emission of smoke from a chimney in an SCA is an offence, prosecution is difficult as it is costly, time consuming and defences can be used (such as the use of an authorised fuel or exempted class of fireplace).” **(OFTEC)**

“If new SCAs are to be created then surely the appropriate metric should include average smoke derived PM concentrations? Perhaps alongside a measure of the

number of receptors exposed to the elevated levels of smoke?" **(Individual Respondent)**

Welsh Government Response

There were issues raised in relation to enforcement of smoke control areas and the balance between urban and rural application. The impact on individual households where the current appliances are not classed as exempt was also highlighted.

The Environment (Air Quality and Soundscapes) (Wales) Bill, which is currently going through the Senedd process, strengthens smoke control legislation and proposes a switch to a civil sanctions regime to facilitate enforcement. We will be producing smoke control guidance as part of the Bill and will be encouraging local authorities to consider new smoke control areas as part of their holistic approach to local air quality.

Question 31

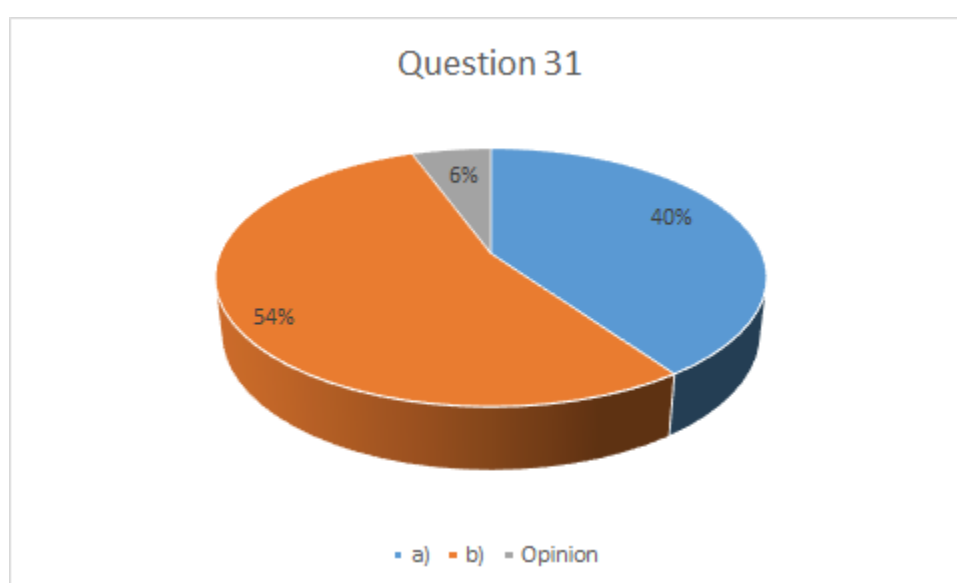
If so in your opinion what additional coverage would be appropriate?

a) Whole of Wales.

b) Major centres of population (Cities and towns over a certain population size).

c) Some other metric e.g. concentration of housing, level of deprivation, proximity to sensitive receptors.

Responses submitted



In response to this question 68 respondents selected either a) or b). Of these, 39 opted for an approach based on major centres of population, while 29 preferred an all-Wales approach.

Indicative Quotes

“Currently SCAs don't completely ban the burning of solid fuels so extending this to the whole of Wales would be a way to ensure that any burning that is allowed would have to use fuel and equipment that meet minimum emission standards. Any burning should be phased out in urban areas as quickly as possible. With help provided to those who need it including helping those in rural areas to access healthier alternatives.” **(Healthy Air Cymru)**

“We believe that a whole Wales approach would disadvantage those that live in rural areas who are more likely to use stoves as the main heat source and be in an area where the ambient AQ does not justify the restrictions of a SCA.” **(Natural Resources Wales)**

“The medium term target should be that the whole of Wales is covered by a SCA. This would require a complete ban on house coal but also wet wood irrespective of delivered volume. Hence b. seems the most logical intermediate step.” **(CPL Industries Ltd.)**

Welsh Government Response

The Environment (Air Quality and Soundscapes) (Wales) Bill does not include plans to mandate the application of smoke control orders. Consultation feedback on the Bill highlighted the need for proportionate action and a need to gather further evidence on the distinction between urban and rural areas in relation to smoke control.

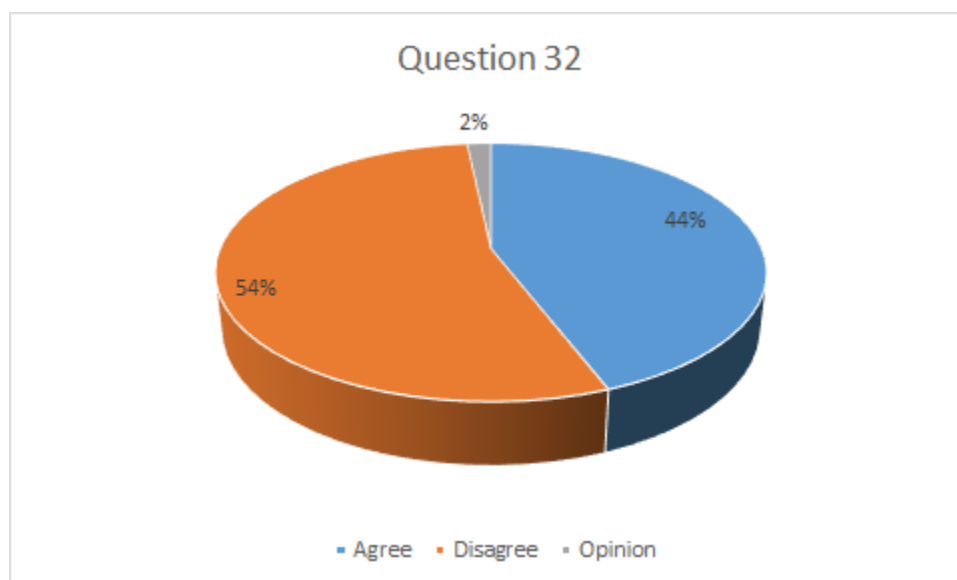
Question 32

Do you agree that the Welsh Government should consider available options to regulate the types of appliance and fuels that can be used in outdoor settings?

a) Yes

b) No

Responses submitted



Of 120 responses, 65 disagreed with the proposal to regulate outdoor burning appliances and fuels. It was observed that outdoor burning (with the exception of bonfires) is a highly seasonal activity, with many households using such appliances only a few times a year. Responses included suggestions regarding regulation of bonfires.

Indicative quotes

“Total sales of charcoal in the whole of the UK are c 50-60kt (numerous surveys to support this) charcoal is clearly smokeless (CPL charcoal is HETAS approved) with Pm2.5 emissions of 2-5g/hour this compares to a UK market of c 3mtp.a. for wood, coal and smokeless fuel burning.. CPL has a major presence in major retailers based on this position summer sales of wood are (c 12%) of winter. Regulation in this area risks being seen as over-zealous to very little effect and could damage public goodwill to air pollution actions in key areas.” **(CPL Industries Ltd.)**

“Not at this time as the focus should be on the main area of concern i.e. household heating and ensure that any new initiatives are properly resourced.”
(Monmouthshire County Council)

Welsh Government Response

Over half the respondents disagreed with regulating outdoor fuels with outdoor burning being an occasional, seasonal activity. Whilst there is no current regulatory framework for outdoor fuels, a number of respondents highlighted that manufacturers have gone through certification processes to establish the level of emissions from their fuels.

Based on the mixed response to this question, our focus will be on reducing emissions from the more regular practice of indoor domestic combustion.

Question 33

We would like to know your views on the effects that reducing emissions from domestic burning will have on the Welsh language, specifically on opportunities for people to use Welsh.

Responses submitted

There were 60 responses to this question. The majority of responders felt this question was inappropriate and not relevant to the consultation. A number of respondents suggested proposals on domestic combustion will not specifically effect the Welsh language or opportunities for people to use Welsh. A few emphasised the importance of providing information, evidence, education and communications in Welsh and English.

Welsh Government Response

We are committed to supporting the Welsh language and culture as we develop future policy and communication tools to support air quality improvements.

Question 34

What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?

Responses submitted

There were 23 responses to this question. The majority of responses to this question stated the proposals did not treat the Welsh language less favourably than the English language. Some points were raised in relation to use of Welsh language in communications and engagement and protecting our cultural heritage.

Welsh Government Response

Please see response to question 33.

Question 35

Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Responses submitted

There were 29 responses to this question. The majority of responses highlighted there would be no negative impacts if all relevant information is accessible in Welsh and English. Many responses highlighted the importance of providing information, evidence, education and communications in Welsh and English.

Welsh Government Response

Please see response to question 33.

Question 36

We have asked a number of specific questions. If you have any related issues that we have not specifically addressed, please use this space to report them.

Responses submitted

67 respondents provided additional comments. These focused mainly on the issues of application of any rules in a rural as opposed to an urban context; the impact on household income and enforceability.

Indicative quotes

“We would appreciate guidance on the use of coal at heritage sites, we understand that heritage use is exempt from the English regulations (eg heritage railways and museums) and would appreciate guidance on whether the same is being considered for Wales.” **(Snowdonia National Park)**

“Public health information on stoves and wood smoke must be issued as part of a national campaign and widely communicated, beginning and ending with the message of only burning solid fuel if you have absolutely no alternative, if you must burn dry wood etc... The message should also include the importance of the impact antisocial and health on neighbours. The “Better Burning” campaign is misleading as it provides no reference to cleaner alternatives such as a gas boiler or heat pump and only helps encourage a culture of burning.

Health warnings should be applied to all new stoves if they are not to be banned including the same message as above and comparison of stove pollution to the much cleaner alternatives of gas and electric heat pumps. The ban on new installations in on the grid properties that already have cleaner alternatives already installed such as gas or an electric heat pump must happen as soon as possible.” **(Individual Respondent)**

“There is widespread agreement now that we need to address climate change and a host of other issues related to this e.g. biodiversity decline. Increased woodland cover is essential to this but we wish to reiterate again the importance of having a commercial element to this or else we will never reach the appropriate targets. Well managed commercial forestry and woodlands can create significant numbers of green jobs and we need to find a way to harness this for economic growth, particularly post Covid-19. We should be growing our biomass industry, not hampering it, recognising of course that we must not do this while reducing air quality.” **(Country Landowners’ Association)**

“In this day and age where some of us are trying to reduce carbon footprint and not destroy the planet, it is unbelievable that solid fuel has once again become fashionable. The known health effects of air pollution include illness and even death. Not only does legislation need to change, but the enforcement of it also needs to be looked at. Having reported the air pollution several times to my local authority,

without a minimum number of complainants and about the same property, they rely on a visual check which is unhelpful in this situation. It hasn't been this bad since the 1970's." **(Individual Respondent)**

"Ty Ucha'r Ffordd today: A stone house in 5.5 acres. The house was built originally in 1788. The multifuel stove is in the inglenook and heats the house and water. The flat top keeps kettles warm so that the electric kettle uses less power to boil, it burns anthracite and, in the winter, well-seasoned wood grown from the surrounding land. It was fitted in 2012 and probably has 9-10 years of life **(Morso Dove)**.

"The Future: I will be in my 80's hopefully when the stove comes to the end of its life. If I am to change rather than replace I will need independent advice as to which is best. I know people who research online and still make the wrong choice now. We are talking about serious money. I like to have my coal arrive 1 bag a week all year round, then if I'm snowed up (It has happened) I have plenty of stock and I only have to have a little every week to pay rather than having to save up for a big delivery every time. My stove works even in a power cut. The Beast from the East power cut lasted 22 hours. My wood is leylandii and grey alder planted 1982 and blown down 2013, cut up and kept under cover since then. I feel people who burn their own wood should have some sort of carbon pay back." **(Individual Respondent)**

"Focus on urban areas where the issues are; focus on biomass boilers and the emissions from those; stop the production of kiln dried wood as it is silly to burn carbon to boil water out of wood when a couple of years undercover with access to natural air flow will do the same job for no carbon input." **(Individual Respondent)**

"To be mindful that off grid gas locations are already subjected to much higher heating costs than average. Are sometimes quite rural so fuel costs even more due to delivery costs. These areas need maximum funding whether they receive benefits or not and should be treated accordingly." **(Individual Respondent)**

"A densely populated area such as in South Wales needs to be treated differently to the more rural Mid and North West Wales. Most people, having invested in a woodburning stove, would have the sense to take care to use it properly and safely. My installers and stove handbook provided the information I needed on installation. The stove has made my lounge usable (Victorian terraced house) and gives me huge comfort when at home. The previous gas fire was not pleasant and the radiators are not enough to heat the room. The stove is also a very pleasant heat." **(Individual Respondent)**

Welsh Government Response

A number of themes were raised in this question:

- The potential for legislating on what people burn in their own homes being considered government overreach.
- Whether biomass or wood burning is a sustainable, low carbon fuel source that should be factored into our decarbonisation strategy.
- Heritage steam attractions.
- Request for an accredited list of suppliers and contractors.
- Concern over the popularity of installation of wood burning stoves.
- Financial help needed for other forms of domestic heating.

We wish to highlight that the purpose of legislating to restrict the use of the most polluting fuels is driven by public health concerns, alongside our commitment to decarbonisation. We also wish to make it clear that the purpose of this consultation and any subsequent proposed legislation is to reduce emissions from domestic use of solid fuels, and as such there should be no impact on heritage steam attractions.

Our 'Heat Strategy for Wales' will support our ambition to improve air quality and provide support for householders to transition to low carbon ways of heating their homes.

Easy Read Version Question 1

Do you agree that we should stop using house coal and wet wood for heating our homes and businesses?

Responses submitted

There were 42 responses in answer to this question. The majority referred to the cost of alternative fuels, compared to wood and coal.

Indicative quotes

"I don't use wet wood but my home and my water are heated by my coal fire ,if I had to switch to electric for both I would not be able to afford it and the price of electricity goes up constantly, my kitchen is quite small and there is no room for an electric boiler in there even if I could afford the cost of getting one and having it fitted which I can't as a pensioner .Would the Welsh Assembly be willing to take on the extra cost for all the people who have the same problem as me or are they willing to let us go without heating and hot water?" **(Individual Respondent)**

"Too much of Wales is off grid. Eco heating such as air / underground heat sources are incredibly expensive and not able to be fitted to many types of home. No one tries to burn wet (green) wood, people that burn solid fuel on the whole understand it needs to be seasoned, etc. Clean air is not an issue in the vast majority of Wales, but cost of living is so forcing everyone to use more expensive heating will only cause further issues. Having read your document the figures you quote are from the early 1990's - unless a new (impartial) study is performed then nothing should be done. I have my own woodland and will continue regardless." **(Individual Respondent)**

"The rural alternative is gas or oil, both of which contribute to global warming just as much as coal, at least wood can be argued to be carbon neutral even if it does throw out particulates, we need different rules for different places." **(Individual Respondent)**

"I agree with a partial ban in densely populated areas which could be designated as smokeless zones however in rural areas where there is often limited choice of heating fuels it would be difficult to heat some homes. New technologies such as heat pumps are expensive to retrofit and are beyond the means of many people, particularly retired people in rural areas." **(Individual Respondent)**

"I agree that house coal and wet wood should be phased out for heating houses and businesses in general. However, many houses in rural areas do not have alternative suitable heat sources. For example, I live in a stone cottage with no mains gas. I rely on well-seasoned wood which I and three neighbours cooperatively saw, split and season each year for heating and hot water. We season the wood to until moisture levels are reduced and store the processed firewood in ventilated log stores to further reduce the moisture content. We also bring new firewood indoors to finally dry out before burning which vastly reduces emissions. We are very environmentally

conscious and would love to convert to air or ground source heat but our properties are completely unsuitable for this in spite of taking measures to insulate our properties to reduce heat loss. Three of us have installed photovoltaic panels to reduce electricity grid consumption and two of us also have solar thermal panels.”
(Individual Respondent)

Welsh Government Response

When analysing the comments from this question, it was clear that the themes were broadly similar to those raised in questions 1-18 of the main consultation. A number of respondents highlighted that burning wet wood is both polluting and inefficient and there was broad support for an awareness campaign to educate householders about the effects of burning wet wood. Another theme that emerged from this question was concern over costs for alternative sources for heating, particularly for rural communities and vulnerable people.

Our responses to questions 1-18 are reinforced by the comments received in this easy read question.

Easy Read Version Question 2

How long do you think we should give people and industry to stop using house coal and wet wood?

Responses submitted

There were 41 responses in answer to this question.

Indicative quotes

“New homes should comply with new emissions regulations but the existing housing stock will be costly for householders' conversion to new regulations. Also, the supply of fuels such as biomass pellets is not reliable in the winter when demand is high. There are insufficient trained engineers to install and maintain the new heating technologies at the moment and could certainly not accommodate an increase in demand.” **(Individual Respondent)**

“I think you should consider applying restrictions to larger business but for small business or households which are unable to have bulk gas/oil tanks should not have restrictions.” **(Individual Respondent)**

“I would extend clean air-zones over all populous areas as well as areas connected to the national gas grid, in effect banning the use of bituminous coal in the most areas. I would not ban the sale of wet wood, but make it explicit that it is illegal to burn until properly seasoned. As Wales, in particular, has such a strong association with the history of coal, if the combustion of bituminous coal is to be banned there should be a special dispensation for the National Museum of Wales St Fagans.” **(Individual Respondent)**

“My answer is that you need to be more measured rather than imposing a blanket ban. Recent research shows that a majority of wood burners are installed in urban properties which do not rely on solid fuel for heating but want the aesthetic value. I would suggest that you use smoke-free zones to curtail the use of solid fuels where it is not necessary and do all you can to support people in rural areas to reduce the need for burning fossil fuels by super-insulating homes, for example, with external, fire and moisture-proof cladding and/or triple glazing.” **(Individual Respondent)**

Welsh Government Response

Responses to this question ranged from suggestions for immediate ban on coal and wood burning, to a longer time period, in line with the ending of coal use in power stations. The need for consistency in dealing with home heating regardless of current source of fuel (gas, oil, coal or wood) was highlighted.

Our responses to questions 2, 9 and 10 are reinforced by the comments received in this easy read question.

Government response

The purpose of any restriction on the fuel used to heat our homes is being considered principally in respect of protecting the health of our nation. There are also wider benefits for decarbonisation, nature and the environment.

The responses provided to this consultation have highlighted a number of key themes which will be considered when developing regulations. We will:

- enhance our research and evidence base regarding the contribution domestic burning makes to emissions. This will include the consideration of early insights from Defra's evaluation of their phase out on the sale of traditional house coal and wet wood from May 2021 in England. The evaluation is expected to conclude in March 2024.
- consider the analysis from Defra's project on monitoring and tracking trends in domestic combustion practices in the UK. 5% (2,500) of those being surveyed are in Wales and we anticipate detailed analysis in May 2024. Early indications have shown an increase in the use of wood-burning stoves, though it is likely these will be modern, efficient appliances. This project will give us an up-to-date picture of the practice of burning solid fuels in the home.
- develop legislation to restrict the sale of bituminous house coal, wet wood and manufactured solid fuels and this is expected to progress during this Senedd term. Such regulation would have the benefit of ensuring consistency between England and Wales, providing clarity for both suppliers and households.
- produce smoke control guidance as part of the Environment (Air Quality and Soundscapes) (Wales) Bill.
- develop a domestic burning best practice communications campaign.
- review the consultation responses to the 'Heat Strategy for Wales' which aims to provide homeowners with advice and support for the transition to low carbon heat. Along with other initiatives within the strategy, low carbon heat will be prioritised as part of the next iteration of the Warm Homes Programme to support households in fuel poverty in owner-occupied and private rented homes.

We are grateful for all the responses submitted to this consultation.

Annex A

Responding organisations

Active Building Centre	Healthy Air Cymru	Monmouthshire County Council
Association of Convenience Stores	Heritage Railway Association	National Coppice Federation
British Heart Foundation	HETAS and Woodsure	Natural Resources Wales
Broad Oak and Gilar Farm	Historic Houses	NFU Cymru
C. J. and J. Nicholls	J. J. Jones (Wholesale Coal Merchants) Ltd.	OFTEC (Oil Firing Technical Association Ltd.)
Coed Cymru	J. W. Collins & Son	Public Health Wales
Confor	LG UK	Pwyllgor Ardal Nebo and Nasareth Area Committee
Conwy County Borough Council	Liquid Gas UK	R.J.Hayes & Son
Country Landowners Association	Llais y Goedwig	R.A.Y.C. and Menai Bridge Civic Society
CPL Industries Ltd.	Mathesons Solicitors	Snowdonia National Park
Crymych Coal	MET Woodcraft	Stove Industry Alliance
D J Davies Fuels Ltd.	Mid and North Wales Association of Local Councils	Ty Du Consultancy
Farmers Union of Wales FHL Landlord	Mitsubishi Electric	Wild Resources Ltd

Individual respondents

Barker, Niall	Fenton, David	Newton, Chris
Beech, Sheena	Gibbon, Patrick	Owen, Richard
Bozson, Samuel	Heart, Scott	Phillips, Stephen
Bradshaw, L.	Johnson, Sam	Price, John
Collins, Alan	Jones, Alison	Rambton, Georgina
Cooke, Tony	Jones, Robert Rhys	Roberts, Richard Darron
Cowton, Ian	Kennedy, John	Smith, Jonathan
Cule, Menna	Kent, Susan	Swift, K.
Davies, Eira	Lloyd, Stephen	Verrier, Howard
Eaton, Wendy	Lowe, Bob	White, M.
Edwards, Vincent	Morley, Loraine	Williams, Dorothy
Farmer, Brian	Nattress, David	Williams-Wynne, William

Individuals attending the virtual joint consultation event 11 March 2021

Adams, Rachel	Jenkins, Trefor	Norman, Mathew
Brooks, Wilma	Johns, Sarah	Pollard, Sam
Campini, Paul	Jones, Keith	Prendergast, Jenny
Carpenter, Gideon	Jones, Lisa	Rees, Alun
Chamberlain, Steve	Jones, Richard	Reynolds, Jamie
Cottrill, Simon	Jones, Wendy	Roberts, Gemma
Cunha, Alexandra	Lane, Joanna	Sandoul, Tamara
Evans, Gareth	MacBride-Stewart, Sara	Thompson, Kate

Garbutt, Ross	Macdonald, Eirian	Verlaque, James
Geddes, Anthony	Mansfield, William	Ward, Dan
Gibson, Paul	Marsden, James	White, Paul
Hardiman, Rhiannon	Mather, John	Zorn, Toby
Hayes, Enda	Mayne, Brian	
Hayes, Rhiannon	Minett, Tim	
Heney, Charlotte	Morison, James	
Hopton, Andrew	Morissette, Vicky	
Horsley, Nick	Morrow, Karen	