

Consultation Response Form

Your name:

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Organisation (if applicable):

North & Mid Wales Association of Local Councils

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Questions

- 1) Do you agree that we should phase out the use of bituminous/traditional house coal for domestic/residential burning? **The Association supports this principle.**
- 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?

The Association would support a transition period of no less than 2 years.

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

The Association would support either approach as outlined above.

- 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?

The Association is not a business so cannot make any constructive comment.

5) What support might you require to make these adjustments?

The Association is not a business so cannot make any constructive comment.

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

Yes, subject to comments set out in no 7 below.

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

The Association has the following additional comments to make:

- i) There should be regulation as to cost of replacement burning materials so that those who have not alternative (ie rural areas) are not penalized.
- ii) The installation by a recognized company or person is accepted. However you are looking to impose further cost on the householder by annual inspections and perhaps some financial support for this could be provided by Welsh Government via Local Authorities.

NOTE: The Association represents approx. 30 larger Town and Community Councils in North and Mid Wales. The membership has been involved in the preparation of this response to consultation.

January 2021

8) We are considering a minimum volume for the sale of wet wood to householders. We are proposing that this is set at 2m^3 , 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 0.5m^3
- c) No volume below 1m^3
- d) No volume below 2m^3
- e) No sales of wet wood

Note: A normal net bag of wood purchased from a DIY store, garage or other outlet is usually less than 0.1m^3 .

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

Note: Suppliers and retailers would be permitted to store supplies of wet wood for drying however they would not be allowed to sell this to domestic consumers if it has a moisture content above 20%.

10) If so, how long should any transition period be?

- a) 1 year
- b) 2 years

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?

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?

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?

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

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

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

17) What support might you require to make these adjustments?

- 18) If you have any further comments or suggestions on this section, please provide them here.
- 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?
- 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?
- 21) Would you agree that the Welsh Government should seek to endorse the SFR, or seek to adopt a similar scheme, for application in Wales?
- 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?
- 23) If you have any further comments or suggestions on the sections on manufactured fuels, please provide them here.
- 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?
- 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?
- 26) Would you consider some form of scrappage scheme to be an appropriate method to encourage the replacement of inefficient appliances currently in use?
- 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?
- 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?

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

- a) Option 1
- b) Option 2
- c) Option 3
- d) None of those proposed – please provide your reasoning

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

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.

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

Welsh Language Considerations

33) We would like to know your views on the effects that reducing emissions from domestic burning would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

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

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, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Summary

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

Please enter here:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: