

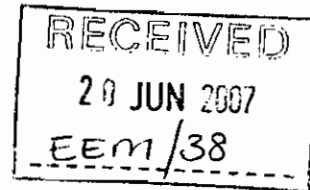


The Royal Environmental Health Institute of Scotland

DPD/Consultations/07/029

18 June 2007

Sarah Hart
Energy Efficiency Unit
Meridian Court
5 Cadogan Street
Glasgow
G2 6AT



Dear Madam,

Energy Efficiency and Microgeneration : Achieving a Low Carbon Future : A Strategy for Scotland

Thank you for the opportunity to comment on the above consultation.

This response has been compiled by the Institute in conjunction with the Scottish Pollution Control Co-ordinating Committee.

The Institute would comment as follows:-

The Institute supports the development of a strategy seeking the long-term reduction in carbon emissions to reduce the effects of climate change and commends the Scottish Executive's commitment to exceed Scotland's share of the UK burden.

The Institute supports the initiative to develop markets and improve business opportunities in Scotland for microgeneration installations provided they do not impact on the health of local communities.

Impacts on human health and local air quality appear to have overlooked, with an emphasis being placed on carbon reduction and energy efficiency targets. There is general concern about the promotion of biomass as a renewable energy source, as a replacement for natural gas, without taking into consideration the significant detrimental impact on local air quality and public health from such installations.

The products of combustion from Biomass are more numerous than the consultation implies, and are in substantially greater quantities than gas combustion emissions. This raises concern especially for areas where Local Air Quality Management Areas have been declared. Technical guidance would suggest that wood burning is second only to coal in being the most polluting solid fuel.

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A number of installations have been proposed for housing developments and schools. It should be remembered that children are a vulnerable group in health terms. Pollutants such as PM₁₀ and PAHs are particularly detrimental, the latter being part of a group of chemicals which are persistent organic pollutants (POPs) that are toxic, persistent in the environment, bio-accumulate in fatty tissue and bio-magnify through the food chain. The National Atmospheric Emissions Inventory considers domestic wood burning to be one of the major sources of PAHs.

The Strategic Environmental Assessment that supports the Strategy states that:-

“3.4.10 In relation to air quality, the appraisal acknowledges that there is the potential for a reduction in local air quality as a result of increased take up of biomass powered installations. However, there is existing air quality legislation in place to ensure that this is addressed appropriately.”

The Institute is concerned that this regime is being promoted when it acknowledges that there is potential for reduced air quality. A number of local authorities where local air quality management targets are already exceeded have also expressed concern.

The Institute supports the Scottish Executive's commitment to end fuel poverty by 2016. Many of the Institute's members are directly involved in improving local housing conditions and providing safer, warmer houses for people to live in. The Institute is actively involved in the review of the housing 'tolerable standard' and seeks to ensure that these targets are acknowledged there.

I look forward to the outcome of your consultation in due course.

Yours faithfully



Valerie Cameron
Director of Professional Development

The Royal Environmental Health Institute of Scotland (the Institute) has been in existence for over 125 years and has around 1,200 members the majority of whom are Environmental Health Officers working in that capacity for Scottish local authorities.

The objects for which the Institute is established are for the benefit of the community to promote the advancement of Environmental Health by:

- stimulating interest in and disseminating knowledge concerning Environmental Health;
- promoting education and training in matters relating to Environmental Health; and
- maintaining, by examination or otherwise, high standards of professional practice and conduct on the part of Environmental Health Officers in Scotland.

Environmental Health Officers in Scotland are part of a graduate only profession and by virtue of their under-pinning academic education, professional practical training, professional qualifications and experience are well placed to apply a holistic public health approach to the education of the public and to the enforcement of a wide range of environmental and public health legislation.

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