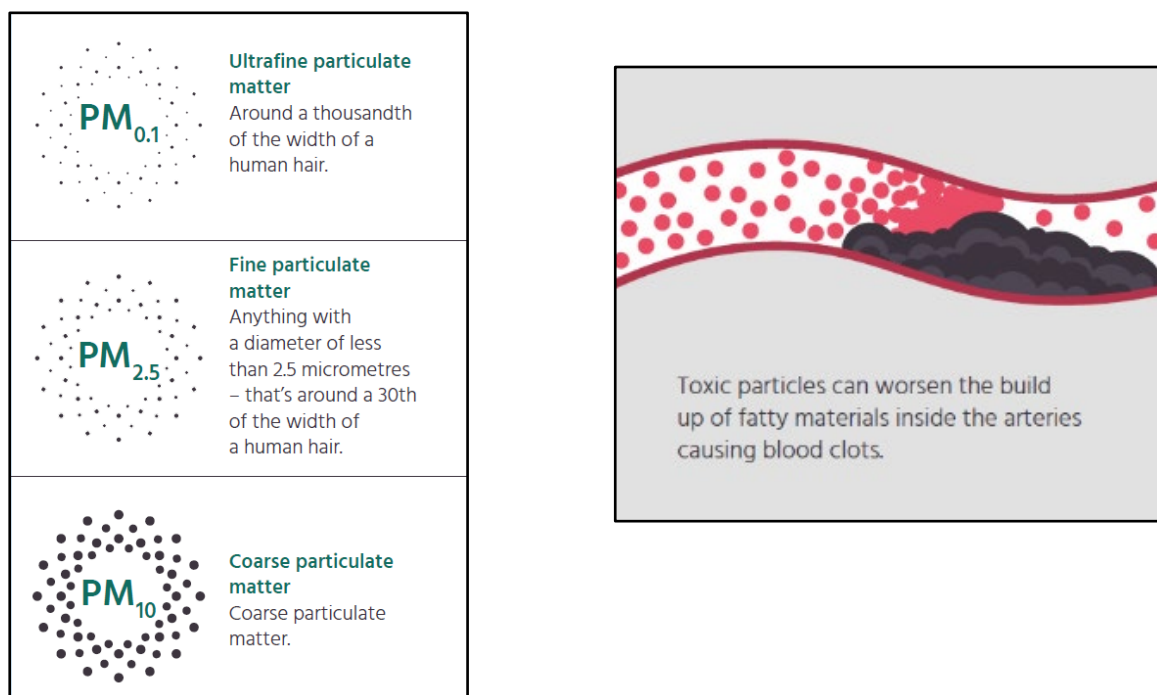


Particulate Matter (PM₁₀, PM_{2.5} and PM_{0.1})

Particulate Matter (PM) is categorised on the basis of the size of the particles. PM_{2.5} is particles with a diameter of less than 2.5µm, while PM₁₀ roughly equates to the mass of particles less than 10µm in diameter. The very smallest particles, ultrafine PM_{0.1} (particles smaller than 0.1 microns) are thought, once inhaled, to be able to pass directly into the bloodstream.

Figure 3. Illustration of particulate matter sizeⁱ



PM is made up of a wide range of materials and arises from a variety of sources. Concentrations of PM comprises of primary particles emitted directly into the atmosphere from combustion sources. Secondary particles are formed by chemical reactions in the air. PM derives from both anthropogenic and natural sources (such as sea spray and Saharan dust). In the UK, the largest anthropogenic sources are stationary fuel combustion and transport. Road transport gives rise to primary particles from engine emissions, tyre and brake wear and other non-exhaust emissions. Other primary sources include quarrying, construction and non-road mobile sources. Secondary PM is formed when emissions of ammonia, react with sulphur dioxide or oxides of nitrogen also present as pollutants in the atmosphere.

ⁱ BHF NI Air Pollution and Mortality on the Island of Ireland 2023 <https://www.bhf.org.uk/-/media/files/what-we-do/in-your-area/northern-ireland-pages/air-pollution-and-mortality-on-the-island-of-ireland-report.pdf?rev=7f884a2856784374928acb956f2706b9&hash=B6714D212095722B95909C93C2E03279>

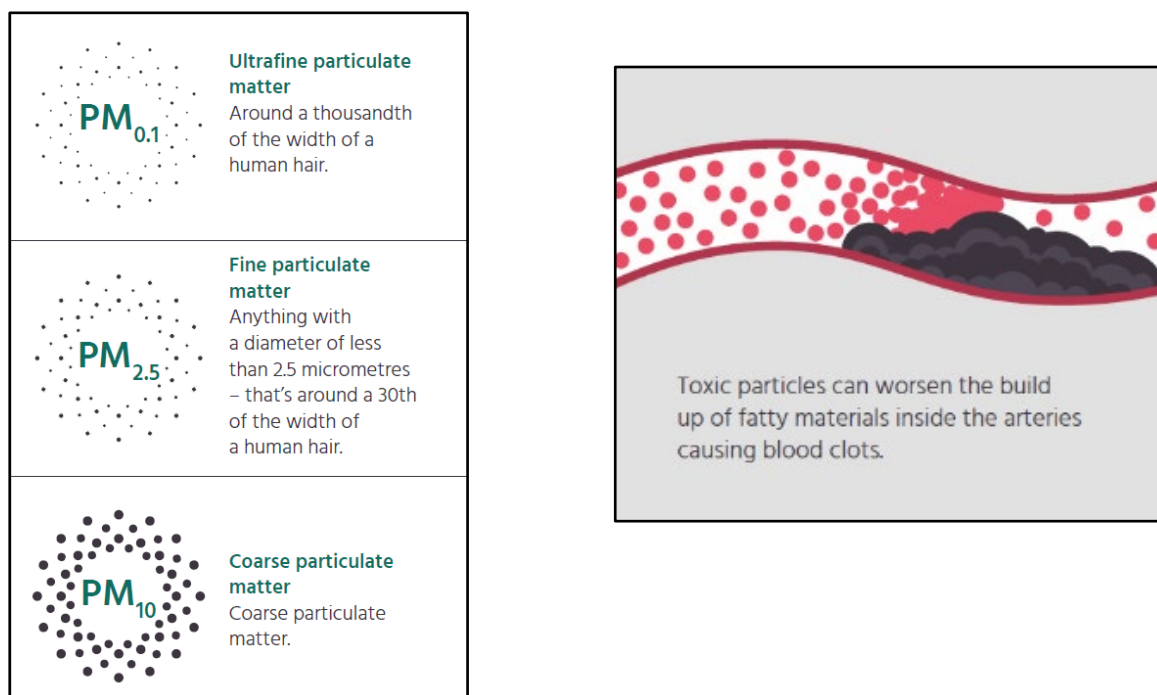
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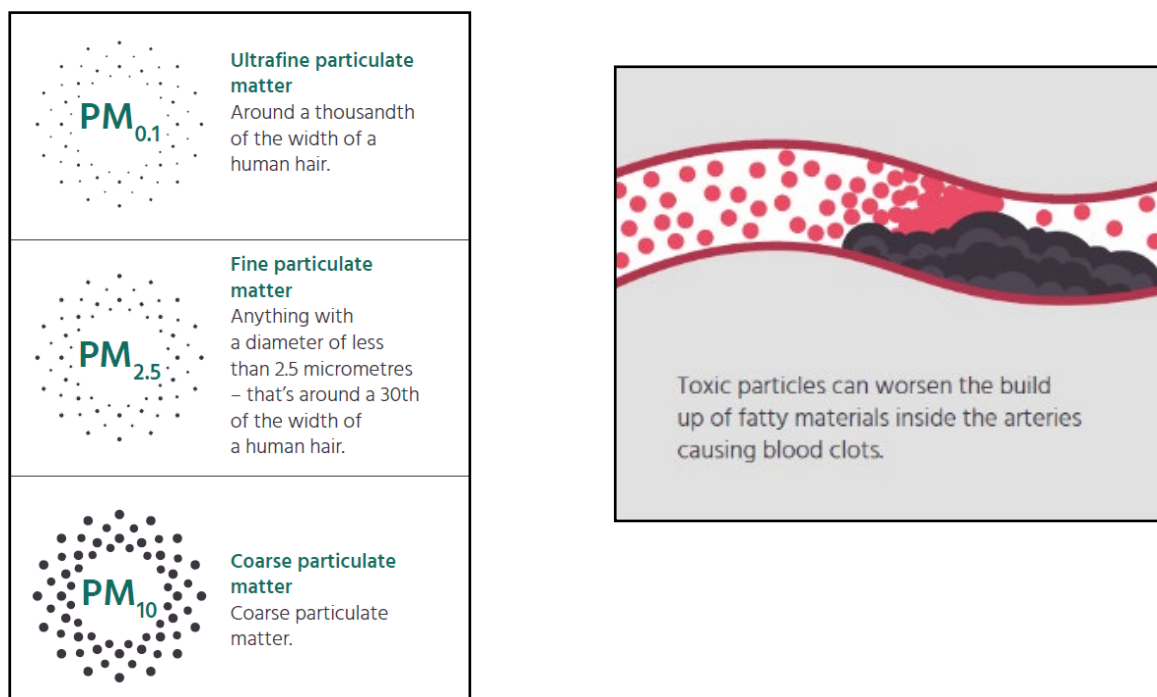
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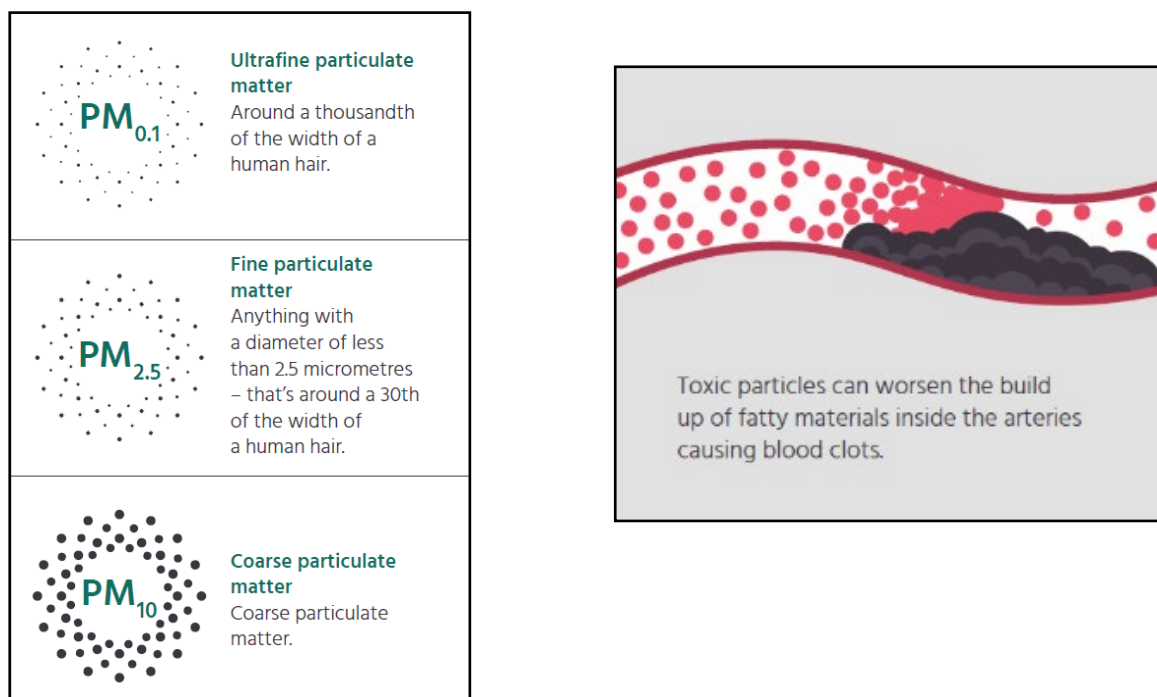
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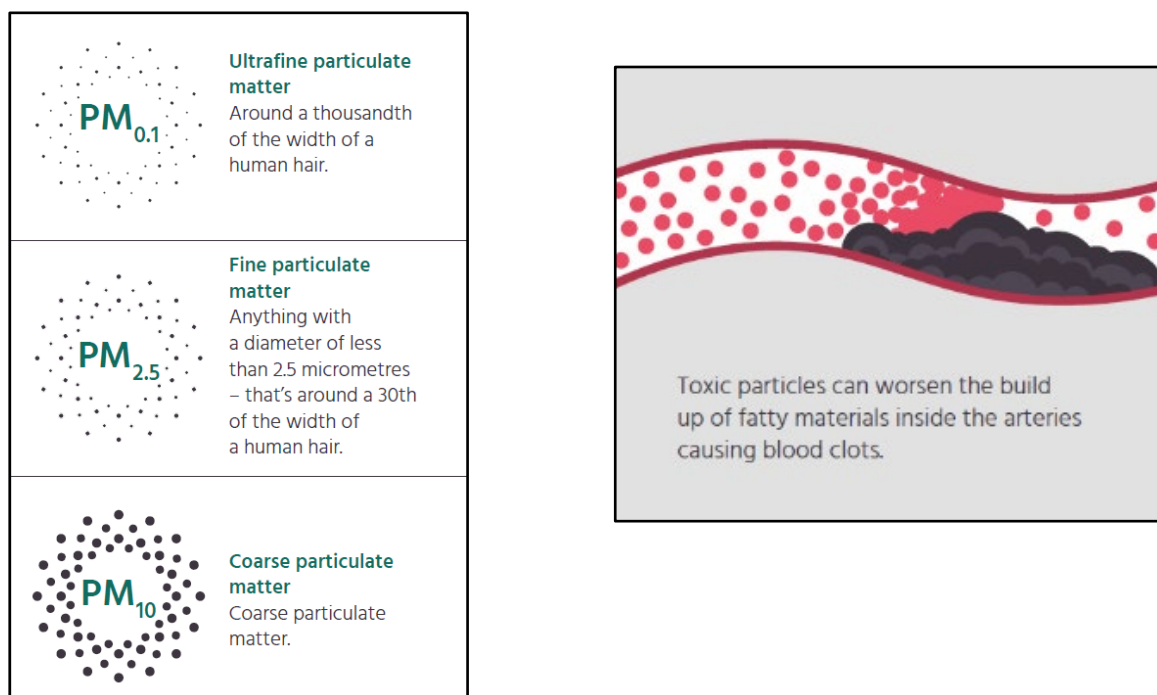
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Zero Pollution Vision

In instances where pollution has occurred, DAERA will seek remediation, through the 'polluter pays' principal, along with enforcement action via DAERA legislation.

Comments on highlighted portion: "Via PPC" and "I think we need a more specific action or delete this"

DAERA will strive to reverse the zero pollution hierarchy and will focus on an example from Industry as a pilot to showcase positive change

Comment on highlighted portion: "Input needed – if no pilot, is there any scope for new improvement via PPC? Thank you"

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Comment on highlighted portion: "Input needed – if no pilot, is there any scope for new improvement via PPC? Thank you"

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: CAS and CIPP input on industrial actions requested by the Minister
Date: 04 April 2025 12:52:25
Attachments: [image001.png](#)

Hi [REDACTED]

With reference to your below request, I've added some text below in red. I hope this is of some assistance

Happy to discuss.

Regards,

[REDACTED]
Chemical and Industrial Pollution Policy
DAERA Natural Environment Policy Division

From: [REDACTED]
Sent: 03 April 2025 13:28
To: [REDACTED]
Cc: [REDACTED]
Subject: CAS and CIPP input on industrial actions requested by the Minister

Good afternoon [REDACTED]

We have been asked to get a copy of the Clean Air Strategy to the Minister by this Friday and I wanted to ask you about some proposed changes the Minister had requested:

Towards zero pollution.

This Strategy follows the principal of the EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'. Based on this vision DAERA will focus on:

- a) Preventing air pollution at source;
- b) If prevention is not fully possible, air pollution should be minimised; and
- c) If air pollution has occurred, it should be remediated.

Outcome – We have better air quality

Indicators - Reduced trend in NO₂ and PM in DAERA's Air Pollution NI report;

Reduced trend in NO₂ and PM in NIEA IPRI annual reporting for industry; % increased enforcement when pollution has occurred.

- Can CIPP please consider, particularly regarding c)

- My concern regarding this is that agreement with NIEA is needed before a ‘% increase enforcement target’ can be included and I’m very conscious that they are currently struggling with a lack of staff resource in several areas. Therefore, without current vacancies being filled and were appropriate additional resources allocated, they may not be able to achieve.

In instances where pollution has occurred, DAERA will seek remediation, through the ‘polluter pays’ principal, along with enforcement action via DAERA legislation.

- Can CIPP please consider e.g. in respect of LCP/MCP, PCBs etc
- While implementation of the NI PPC Regulations makes a significant impact on NI’s air quality, through the regulation of large and medium sized industrial sites in NI, the full suit of environmental regulation will need to be considered.
- CIPP only has influence over the NI PPC Regulations PART C charging scheme, whereby we work with local councils to agree the annual percentage increase and complete the necessary paperwork on their behalf to ensure it is applied. Each year we consult with NIEA on what increase they are applying across the board in the NIEA Charging Scheme. We are aware that this year they were hoping to increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle. However, a final amount was not agreed before we had to sign-off on the PART C increase on the 1st April 2025. As a result, we only applied the previous years (2024-25) deflator value as we normally do, for the 205-26 financial year.
- In terms of LCP’s feeding into the Single Energy Market (SEM) on the island of Ireland, under the terms of the Windsor Framework we are required to ensure NI remains aligned with EU legislation in our regulatory activities on these sites . As a result, we are currently reviewing the EU’s new ‘Industrial and Livestock Rearing Emissions Directive (IED 2.0)’, to see what provisions need to be transposed into NI’s domestic legislation (namely the NI PPC Regulations 2023, as amended), before the 1st July 2026 deadline.
- While the provisions in the IED 2.0 aim to help deliver the EU Action Plan: "Towards a Zero Pollution for Air, Water and Soil"; NI is not obligated to implement the other changes being brought, only those linked to the Windsor Framework.
- However, we are currently working with Defra and the other DG’s to see what aspects we may want to apply across the UK and other UK specific changes that we might to bring in to take account of new emerging industrial sectors etc.
- DAERA policy and NIEA officials are currently working with Defra, other DG’s and the EA on the development of a suite of new UK Best Available Technique (BAT) Conclusions which will be used to inform NI PPC permits. Over time they too are likely to contribute to improvements in air quality but not within the timeframe of this strategy.
- You should also be aware that CIPP have been engaging with Defra and the other DGs in recent years on updating the current UK wide Crematoria Guidance. A consultation was conducted a couple of years ago and we are just waiting confirmation that the Defra SoS is happy to publish it, prior to a Ministerial right round of the DG’s. Some modelling was done as part of the RIA. However, when this was conducted NI had only one crematoria. Now that others have come into operation across the province, application o the new guidance will have a bigger impact than that modelled, particularly wrt emissions of Mercury into the environment.

DAERA will strive to reverse the zero pollution hierarchy and will focus on an example from Industry as a pilot to showcase positive change.

- Can CIPP please consider
- I'm not aware of any pilots but NIEA may be able to assist.
- The only thing that comes to mind that might be of help, is the fact that the coal fired plants at Kilroot Power Station closed in September 2023 and as of the middle of last year two new Open Cycle Gas Turbines started to operate site. These are much more environmentally friendly and will have an impact on local air quality in the longer term.

Please consider these comments and advise if you have any concerns with this approach, or ongoing work that we could mention alongside this text to support this approach.

We have to get our current draft of the strategy to the Minister **by CoP tomorrow** so all comments in advance welcome.

If you are not in a position to comment, we will add at note that CIPP are considering as a holding response.

Happy to discuss,




Air and Environmental Quality
Natural Environment Policy Division | Clare House | 303 Airport Road West | Belfast | BT3 9ED
Phone: 
Email:  | AEQTeam@daera-ni.gov.uk
Website: <https://www.airqualityni.co.uk/>



Zero Pollution Vision

In instances where pollution has occurred, DAERA will seek remediation, through the 'polluter pays' principle, along with enforcement action via DAERA legislation.

Comments on highlighted portion:

Person 1 "CIPP to provide input. Consider LCP/MCP, PCBs"

Person 2 "CIPP only has influence over the NI PPC Regulations PART C charging scheme, whereby we work with local councils to agree the annual percentage increase and complete the necessary paperwork on their behalf to ensure it is applied. Each year we consult with NIEA on what increase they are applying across the board in the NIEA Charging Scheme. We are aware that this year they were hoping to increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle. However, a final amount was not agreed before we had to sign-off on the PART C increase on the 1st April 2025. As a result, we only applied the previous years (2024-25) deflator value as we normally do, for the 205-26 financial year.

I suggest we say:

DAERA will work in partnership with NIEA and the local councils to agree, and assist with the application of the annual percentage increase of the NI PPC Regulations PART C charging scheme. This will increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle.

To be achieved by 1 April 2027."

Person 2 "[REDACTED] can you help make this a strong action?"

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: CAS and CIPP input on industrial actions requested by the Minister - thank you
Date: 08 July 2025 15:59:26
Attachments: [image001.png](#)

Afternoon [REDACTED]

Many thanks indeed for your response on the CAS.

[REDACTED] and I have reviewed and in light of Minister's and [REDACTED] comments we think a meeting would be helpful to help tease out some more 'SMART' actions for DAERA. We appreciate these may not be for CIPP, possibly for NIEA, but we would really appreciate a steer or some suggestions as to how we go forwards.

We are hoping we could say something on new regs that are being made ([REDACTED] only wants 'new' actions, not BAU) so we may need to give further consideration to whether the part C charging scheme can be considered 'new'. We are also thinking of an action around reviewing the need for Hg monitoring – something we would like your thoughts on too.

I am now off on leave for 3.5 weeks, so wondered if you would have any time on Tuesday 5th August to meet online (or [REDACTED] and I are about tomorrow (Wednesday) if you would prefer to discuss sooner)?

Many thanks
[REDACTED]

From: [REDACTED]
Sent: 02 July 2025 11:29
To: [REDACTED]
Cc: [REDACTED]
Subject: CAS and CIPP input on industrial actions requested by the Minister - thank you

Morning [REDACTED]

Thank you very much for your detailed response which I've been working through.

Please see my responses below and I've edited the Strategy accordingly. I think that the Strategy can still accommodate the 'Towards Zero Pollution for Air, Water and Soil' concept as the Minister has requested, and the actions could focus on increase charges above the deflator value/ implementation of the polluter pays principle, and possibly mercury monitoring.

[REDACTED] and I can discuss further. It would also be good to meet with you to discuss when we are all free, but in the meantime, call anytime if you feel anything needs clarified.

Thanks again,
[REDACTED]

From: [REDACTED]
Sent: 04 April 2025 12:52
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]
Subject: CM: CAS and CIPP input on industrial actions requested by the Minister

Hi [REDACTED]

With reference to your below request, I've added some text below in red. I hope this is of some assistance

Happy to discuss.

Regards,
[REDACTED]

[REDACTED]
Chemical and Industrial Pollution Policy
DAERA Natural Environment Policy Division

From: [REDACTED]
Sent: 03 April 2025 13:28
To: [REDACTED]
Cc: [REDACTED]
Subject: CAS and CIPP input on industrial actions requested by the Minister

Good afternoon [REDACTED]

We have been asked to get a copy of the Clean Air Strategy to the Minister by this Friday and I wanted to ask you about some proposed changes the Minister had requested:

Towards zero pollution.

This Strategy follows the principal of the EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'. Based on this vision DAERA will focus on:

- a) Preventing air pollution at source;
 - b) If prevention is not fully possible, air pollution should be minimised; and
 - c) If air pollution has occurred, it should be remediated.
- Outcome – We have better air quality

Indicators - Reduced trend in NO2 and PM in DAERA's Air Pollution NI report;
Reduced trend in NO2 and PM in NIEA IPRI annual reporting for industry; %
increased enforcement when pollution has occurred.

- Can CIPP please consider, particularly regarding c)

- My concern regarding this is that agreement with NIEA is needed before a '% increase enforcement target' can be included and I'm very conscious that they are currently struggling with a lack of staff resource in several areas. Therefore, without current vacancies being filled and were appropriate additional resources allocated, they may not be able to achieve.

I have removed the text '% increase enforcement target'

In instances where pollution has occurred, DAERA will seek remediation, through the 'polluter pays' principal, along with enforcement action via DAERA legislation.

- Can CIPP please consider e.g. in respect of LCP/MCP, PCBs etc
- While implementation of the NI PPC Regulations makes a significant impact on NI's air quality, through the regulation of large and medium sized industrial sites in NI, the full suit of environmental regulation will need to be considered. Noted
- CIPP only has influence over the NI PPC Regulations PART C charging scheme, whereby we work with local councils to agree the annual percentage increase and complete the necessary paperwork on their behalf to ensure it is applied. Each year we consult with NIEA on what increase they are applying across the board in the NIEA Charging Scheme. We are aware that this year they were hoping to increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle. However, a final amount was not agreed before we had to sign-off on the PART C increase on the 1st April 2025. As a result, we only applied the previous years (2024-25) deflator value as we normally do, for the 205-26 financial year.

Many thanks [REDACTED]. Based on this, I would suggest the following action if you agree?
'DAERA will work in partnership with the NIEA and the local councils to agree and assist with the application of the annual percentage increase of the NI PPC Regulations PART C charging scheme. This will increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle. To be achieved by 1 April 2027.'

- In terms of LCP's feeding into the Single Energy Market (SEM) on the island of Ireland, under the terms of the Windsor Framework we are required to ensure NI remains aligned with EU legislation in our regulatory activities on these sites. As a result, we are currently reviewing the EU's new 'Industrial and Livestock Rearing Emissions Directive (IED 2.0)', to see what provisions need to be transposed into NI's domestic legislation (namely the NI PPC Regulations 2023, as amended), before the 1st July 2026 deadline. If the IED 2.0 results in improved emissions standards as a result of being transposed into NI's domestic legislation, this could be included if the changes are known by the time we publish the Strategy.
- While the provisions in the IED 2.0 aim to help deliver the EU Action Plan: "Towards a Zero Pollution for Air, Water and Soil"; NI is not obligated to implement the other changes being brought, only those linked to the Windsor Framework. Noted.
- However, we are currently working with Defra and the other DG's to see what aspects we may

want to apply across the UK and other UK specific changes that we might to bring in to take account of new emerging industrial sectors etc. Noted and thanks

- DAERA policy and NIEA officials are currently working with Defra, other DG's and the EA on the development of a suite of new UK Best Available Technique (BAT) Conclusions which will be used to inform NI PPC permits. Over time they too are likely to contribute to improvements in air quality but not within the timeframe of this strategy. Noted this is outside the timeframe of the Strategy.
- You should also be aware that CIPP have been engaging with Defra and the other DGs in recent years on updating the current UK wide Crematoria Guidance. A consultation was conducted a couple of years ago and we are just waiting confirmation that the Defra SoS is happy to publish it, prior to a Ministerial right round of the DG's. Some modelling was done as part of the RIA. However, when this was conducted NI had only one crematoria. Now that others have come into operation across the province, application o the new guidance will have a bigger impact than that modelled, particularly wrt emissions of Mercury into the environment. Thank you [REDACTED] This may be a good reason for DAERA to peruse Mercury monitoring, and we could possible include am action based on this.

DAERA will strive to reverse the zero pollution hierarchy and will focus on an example from Industry as a pilot to showcase positive change.

- Can CIPP please consider
- I'm not aware of any pilots but NIEA may be able to assist. Noted and thank you for considering.
- The only thing that comes to mind that might be of help, is the fact that the coal fired plants at Kilroot Power Station closed in September 2023 and as of the middle of last year two new Open Cycle Gas Turbines started to operate site. These are much more environmentally friendly and will have an impact on local air quality in the longer term. Thank you for this and we update. As this has already taken place, it can't be included as per Katrina's guidance, but that's very helpful background.

Please consider these comments and advise if you have any concerns with this approach, or ongoing work that we could mention alongside this text to support this approach.

We have to get our current draft of the strategy to the Minister **by CoP tomorrow** so all comments in advance welcome.

If you are not in a position to comment, we will add at note that CIPP are considering as a holding response.

Happy to discuss,

[REDACTED]

[REDACTED]

Natural Environment Policy Division | Clare House | 303 Airport Road West | Belfast | BT3 9ED

[REDACTED]

AEQTeam@daera-ni.gov.uk

Website: <https://www.airqualityni.co.uk/>



From: [REDACTED]

Sent: 09 July 2025 13:00

To: [REDACTED]

Cc: [REDACTED]
[REDACTED]

Subject: FW: DAERA/ DfE CAS meeting actions 21 May 25 - update requested

Hi [REDACTED]

Please see below comments from DfE on the CAS.

The second two are relevant to CIPP's work and we are keen to discuss how we can address these comments and include more actions relating to IED, MCP, PPC Regs and the role of NIEA in the CAS (noting [REDACTED] desire that actions are to be SMART and new):

- There appear to be some gaps in terms of references to The Environment Act (Environmental improvement plan), Industrial Emissions Directive (run hour limits on energy generators), Medium Combustion Plant Directive (ELV compliance from 1-1-25) and PPC Regs (are these being renewed?) all of which have a role to play here. I'm sure there are more.
- What role do NIEA play in this, are associated agencies in GB taking a leadership role? The main mention of the NIEA appears to be in the context of a Peaceplus project rather than in any regulation, protection or enforcement capacity.

I'm off on leave from today, but I'm very happy for [REDACTED] to set something up for the three of us to chat this through when I'm back.

Many thanks
[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: CAS and CIPP input on industrial actions requested by the Minister - thank you
Date: 18 August 2025 12:42:18
Attachments: [image001.png](#)

[REDACTED]
Many thanks indeed for your time this morning. It was very helpful to discuss Minister [REDACTED] requests regarding the contents of the CAS and for you to take us through the various policy areas and your thoughts on DfE's comments.

For a variety of reasons (BAU, too early in policy development, await a Defra decision, already underway etc) a number of potential actions do not meet the 'criteria' for inclusion in the strategy. We have however identified two possible actions relating to:

1. Increased enforcement target for NIEA – I will pick this up with [REDACTED] and, if appropriate, we will pick up with NIEA; and
2. Possible assessment of Hg monitoring in NI. I'll pick this up with [REDACTED] on my return from leave in early September.

Thanks again for your input

[REDACTED]

From: [REDACTED]
Sent: 08 July 2025 15:59
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: CAS and CIPP input on industrial actions requested by the Minister - thank you

Afternoon [REDACTED]

Many thanks indeed for your response on the CAS.

[REDACTED] and I have reviewed and in light of Minister's and [REDACTED] comments we think a meeting would be helpful to help tease out some more 'SMART' actions for DAERA. We appreciate these may not be for CIPP, possibly for NIEA, but we would really appreciate a steer or some suggestions as to how we go forwards.

We are hoping we could say something on new regs that are being made ([REDACTED] only wants 'new' actions, not BAU) so we may need to give further consideration to whether the part C charging scheme can be considered 'new'. We are also thinking of an action around reviewing the need for Hg monitoring – something we would like your thoughts on too.

I am now off on leave for 3.5 weeks, so wondered if you would have any time on Tuesday 5th August to meet online (or [REDACTED] and I are about tomorrow (Wednesday) if you would prefer to discuss sooner)?

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[REDACTED]

From: [REDACTED]
Sent: 03 April 2025 13:28
To: [REDACTED]
Cc: [REDACTED]
Subject: CAS and CIPP input on industrial actions requested by the Minister

Good afternoon [REDACTED],

We have been asked to get a copy of the Clean Air Strategy to the Minister by this Friday and I wanted to ask you about some proposed changes the Minister had requested:

Towards zero pollution.

This Strategy follows the principal of the EU Action Plan: 'Towards Zero Pollution for Air, Water and Soil'. Based on this vision DAERA will focus on:

- a) Preventing air pollution at source;
- b) If prevention is not fully possible, air pollution should be minimised; and
- c) If air pollution has occurred, it should be remediated.

Outcome – We have better air quality

Indicators - Reduced trend in NO₂ and PM in DAERA's Air Pollution NI report;

Reduced trend in NO₂ and PM in NIEA IPRI annual reporting for industry; %

increased enforcement when pollution has occurred.

- Can CIPP please consider, particularly regarding c)
- My concern regarding this is that agreement with NIEA is needed before a ' % increase enforcement target' can be included and I'm very conscious that they are currently struggling with a lack of staff resource in several areas. Therefore, without current vacancies being filled and were appropriate additional resources allocated, they may not be able to achieve.

I have removed the text ' % increase enforcement target'

In instances where pollution has occurred, DAERA will seek remediation, through the 'polluter pays' principal, along with enforcement action via DAERA legislation.

- Can CIPP please consider e.g. in respect of LCP/MCP, PCBs etc
- While implementation of the NI PPC Regulations makes a significant impact on NI's air quality, through the regulation of large and medium sized industrial sites in NI, the full suite of environmental regulation will need to be considered. Noted
- CIPP only has influence over the NI PPC Regulations PART C charging scheme, whereby we work with local councils to agree the annual percentage increase and complete the

necessary paperwork on their behalf to ensure it is applied. Each year we consult with NIEA on what increase they are applying across the board in the NIEA Charging Scheme. We are aware that this year they were hoping to increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle. However, a final amount was not agreed before we had to sign-off on the PART C increase on the 1st April 2025. As a result, we only applied the previous years (2024-25) deflator value as we normally do, for the 205-26 financial year.

Many thanks [REDACTED] Based on this, I would suggest the following action if you agree? 'DAERA will work in partnership with the NIEA and the local councils to agree and assist with the application of the annual percentage increase of the NI PPC Regulations PART C charging scheme. This will increase charges above the deflator value to take account of cost of living raises and thus, enable full cost recovery and implementation of the polluter pays principle. To be achieved by 1 April 2027.'

- In terms of LCP's feeding into the Single Energy Market (SEM) on the island of Ireland, under the terms of the Windsor Framework we are required to ensure NI remains aligned with EU legislation in our regulatory activities on these sites. As a result, we are currently reviewing the EU's new 'Industrial and Livestock Rearing Emissions Directive (IED 2.0)', to see what provisions need to be transposed into NI's domestic legislation (namely the NI PPC Regulations 2023, as amended), before the 1st July 2026 deadline. If the IED 2.0 results in improved emissions standards as a result of being transposed into NI's domestic legislation, this could be included if the changes are known by the time we publish the Strategy.
- While the provisions in the IED 2.0 aim to help deliver the EU Action Plan: "Towards a Zero Pollution for Air, Water and Soil"; NI is not obligated to implement the other changes being brought, only those linked to the Windsor Framework. Noted.
- However, we are currently working with Defra and the other DG's to see what aspects we may want to apply across the UK and other UK specific changes that we might to bring in to take account of new emerging industrial sectors etc. Noted and thanks
- DAERA policy and NIEA officials are currently working with Defra, other DG's and the EA on the development of a suite of new UK Best Available Technique (BAT) Conclusions which will be used to inform NI PPC permits. Over time they too are likely to contribute to improvements in air quality but not within the timeframe of this strategy. Noted this is outside the timeframe of the Strategy.
- You should also be aware that CIPP have been engaging with Defra and the other DGs in recent years on updating the current UK wide Crematoria Guidance. A consultation was conducted a couple of years ago and we are just waiting confirmation that the Defra SoS is happy to publish it, prior to a Ministerial right round of the DG's. Some modelling was done as part of the RIA. However, when this was conducted NI had only one crematoria. Now that others have come into operation across the province, application o the new guidance will have a bigger impact than that modelled, particularly wrt emissions of Mercury into the environment. Thank you [REDACTED] This may be a good reason for DAERA to peruse Mercury monitoring, and we could possible include am action based on this.

DAERA will strive to reverse the zero pollution hierarchy and will focus on an example from Industry as a pilot to showcase positive change.

- Can CIPP please consider
- I'm not aware of any pilots but NIEA may be able to assist. Noted and thank you for considering.
- The only thing that comes to mind that might be of help, is the fact that the coal fired plants at Kilroot Power Station closed in September 2023 and as of the middle of last year two new Open Cycle Gas Turbines started to operate site. These are much more environmentally friendly and will have an impact on local air quality in the longer term. Thank you for this and we update. As this has already taken place, it can't be included as per [REDACTED] guidance, but that's very helpful background.

Please consider these comments and advise if you have any concerns with this approach, or ongoing work that we could mention alongside this text to support this approach.

We have to get our current draft of the strategy to the Minister **by CoP tomorrow** so all comments in advance welcome.

If you are not in a position to comment, we will add at note that CIPP are considering as a holding response.

Happy to discuss,

[REDACTED]

[REDACTED]
Air and Environmental Quality

Natural Environment Policy Division | Clare House | 303 Airport Road West | Belfast | BT3 9ED

[REDACTED]
[REDACTED] AEQTeam@daera-ni.gov.uk

Website: <https://www.airqualityni.co.uk/>



From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Clean Air Strategy - input on industrial actions requested by the Minister
Date: 21 August 2025 16:14:37
Attachments: [image001.png](#)

Hi [REDACTED]

As you know, IPRI are an operational team so we can only implement the legislation as it is given to us. Air emission limits are included in our Pollution Prevention & Control permits according to the emission limit values set in EU BREF and UK BAT documents.

I am concerned that “Reduced trend in NO₂ and PM in NIEA IPRI annual reporting for industry” is included as an indicator in Strategic Objective 4. The only annual reporting we contribute to is the UK Pollutant Release and Transfer Register (PRTR) data sets ([Search by facility - Defra, UK](#)) and the National Air Emissions Inventory (NAEI) [The UK National Atmospheric Emissions Inventory \(NAEI\) | National Atmospheric Emissions Inventory](#). However, the thresholds for reporting to these are quite high so it wouldn’t capture most of the emissions and there is no driver by which we could reduce these other than where limits in BREF or BAT documents are reduced (which happens quite infrequently).

The biggest change we have been implementing is the Medium Combustion Plant Directive (MCPD) which is introducing emissions limits to smaller combustion plants which wouldn’t have been caught under PPC previously (and wouldn’t have had emission limits imposed on them). However, we are only doing this for MCPD on existing Part A and B PPC sites – the bulk of the MCPD permits would be Part C permits be issued by councils. The first phase of this implementation imposed emission limits on plant between 5-20MW thermal input from 2025. The next phase will be for plant between 1-5MW thermal input and will impose emission limits from 2030. There is some info here: <https://www.daera-ni.gov.uk/articles/medium-combustion-plant-directive-and-specified-generators> It might be worth mentioning in the paper as it should drive air quality improvements but it will likely take some years before the impact of that would be measurable. Monitoring against the emission limits only needs to be carried out once every 3 years.

IPRI has not planned any increased enforcement – we already ensure compliance against air emissions limits in our permits and carry out enforcement action as appropriate.

For any potential legislative changes relating to air emissions and PPC, you would need to talk to [REDACTED] in the CIPP team.

Regards,

[REDACTED]

From: [REDACTED]
Sent: 20 August 2025 12:17

To: [REDACTED]

Cc: [REDACTED]
[REDACTED]
[REDACTED]

Subject: Clean Air Strategy - input on industrial actions requested by the Minister

Good afternoon [REDACTED]

Please see attached, a current draft the NI Clean Air Strategy (CAS).

The Strategy now includes a Strategic Objective (4.) called 'Towards zero pollution'. This has been added at our Ministers request.

Strategic Objective 4 follows the principle of the EU Action Plan, and will require input from NIEA IPRI to help deliver positive changes for air quality:

- a. Preventing air pollution at source;
- b. If prevention is not fully possible, air pollution should be minimised; and
- c. If air pollution has occurred, it should be remediated.

We have drafted an outcome and indicator to monitor if this objective has been met:

Outcome - We have better air quality

Indicators - Reduced trend in NO₂ and PM in DAERA's Air Pollution NI report; and

Reduced trend in NO₂ and particulate matter in NIEA IPRI annual reporting for industry.

With this in mind, do IPRI have any work in the pipeline, over the next year or longer term, that could be added as an action to the CAS, to help deliver this objective?

For example, is there any increased enforcement planned, or any planned actions that could result in a downward trend in NO₂/PM emissions?

Also, what this the main routine publication of IPRI data on the testing of emissions/consents, which we could use to monitor trends?

Please note that we cannot include BAU actions, and all actions must be 'SMART'.

All comments or suggested actions are welcome by Friday 29 August.

Kind regards,

[REDACTED]

[REDACTED]
Air and Environmental Quality

Natural Environment Policy Division | Clare House | 303 Airport Road West | Belfast | BT3 9ED

[REDACTED] | AEQTeam@daera-ni.gov.uk

Website: <https://www.airqualityni.co.uk/>



From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Clean Air Strategy - input on industrial actions requested by the Minister
Date: 01 September 2025 09:46:00
Attachments: [image001.png](#)

Morning [REDACTED]

Many thanks indeed for your response which is helpful, and as I expected. I number of the points we raised with you had been brought up by DfE so we needed to work through them and ensure we had considered all potential options for actions.

I appreciate the situation that we are in as regards industrial pollution and air quality and I recognise that most of the initial actions to go in the CAS stemmed from RTP, which is paused indefinitely.

This Strategy is a first step - an important first step as regards increasing the profile of air pollution in NI and highlighting a need for change. Recognising its likely to be 5 year duration, I am content, in the circumstances that this Strategy focusses more on data, education, PM and residential heating, with a view to the second Strategy picking up further issues and actions, hopefully for industry (CIPP has a few things possibly in the pipeline/coming through from the EU which will be sufficiently certain to be included in the next Strategy).

Many thanks for your feedback.

[REDACTED]

From: [REDACTED]
Sent: 21 August 2025 16:15
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED]
Subject: RE: Clean Air Strategy - input on industrial actions requested by the Minister

Hi [REDACTED]

As you know, IPRI are an operational team so we can only implement the legislation as it is given to us. Air emission limits are included in our Pollution Prevention & Control permits according to the emission limit values set in EU BREF and UK BAT documents.

I am concerned that "Reduced trend in NO₂ and PM in NIEA IPRI annual reporting for industry" is included as an indicator in Strategic Objective 4. The only annual reporting we contribute to is the UK Pollutant Release and Transfer Register (PRTR) data sets ([Search by facility - Defra, UK](#)) and the National Air Emissions Inventory (NAEI) [The UK National Atmospheric Emissions Inventory \(NAEI\) | National Atmospheric Emissions Inventory](#). However, the thresholds for reporting to these are quite high so it wouldn't capture most of the emissions and there is no driver by which we could reduce these other than where limits in BREF or BAT documents are reduced (which happens quite infrequently).

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which is introducing emissions limits to smaller combustion plants which wouldn't have been caught under PPC previously (and wouldn't have had emission limits imposed on them). However, we are only doing this for MCPD on existing Part A and B PPC sites – the bulk of the MCPD permits would be Part C permits be issued by councils. The first phase of this implementation imposed emission limits on plant between 5-20MW thermal input from 2025. The next phase will be for plant between 1-5MW thermal input and will impose emission limits from 2030. There is some info here: <https://www.daera-ni.gov.uk/articles/medium-combustion-plant-directive-and-specified-generators> It might be worth mentioning in the paper as it should drive air quality improvements but it will likely take some years before the impact of that would be measurable. Monitoring against the emission limits only needs to be carried out once every 3 years.

IPRI has not planned any increased enforcement – we already ensure compliance against air emissions limits in our permits and carry out enforcement action as appropriate.

For any potential legislative changes relating to air emissions and PPC, you would need to talk to [REDACTED] the CIPP team.

Regards,

[REDACTED]

From: [REDACTED]

Sent: 20 August 2025 12:17

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]

[REDACTED]

Subject: Clean Air Strategy - input on industrial actions requested by the Minister

Good afternoon [REDACTED]

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For example, is there any increased enforcement planned, or any planned actions that could result in a downward trend in NO₂/PM emissions?

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Please note that we cannot include BAU actions, and all actions must be 'SMART'.

All comments or suggested actions are welcome by Friday 29 August.

Kind regards,

[Redacted]

[Redacted]

Air and Environmental Quality

Natural Environment Policy Division | Clare House | 303 Airport Road West | Belfast | BT3 9ED

[Redacted]

| AEQTeam@daera-ni.gov.uk

Website: <https://www.airqualityni.co.uk/>



Topics/policies covered in Discussion Document which are not in CAS

Pollution Prevention and Control

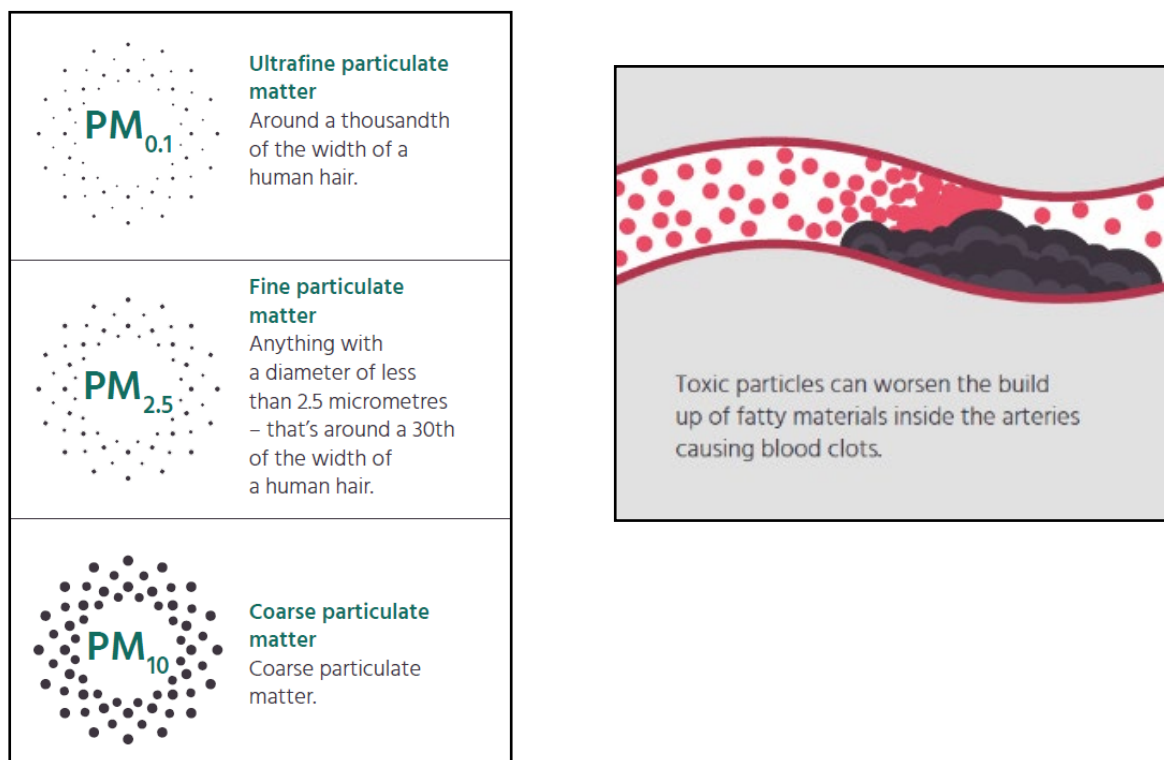
Actions which have been removed from the CAS (from previous Minister's time – see AE1/22/1632306):

- DAERA (and NI district councils) will continue to regulate through the NI PPC Regulations until new UK policy, legislation and BATC's have been developed, and new NI Environmental Permitting Regulations (EPR) are in place. DAERA will also continue to implement the latest EU BREF BAT Conclusions which were published prior to the end of the EU Exit transition period, for relevant industrial sectors such as Waste Incineration, and Food Drink and Milk, which will result in reduced air emission limits values to be met within required timescales

Particulate Matter (PM₁₀, PM_{2.5} and PM_{0.1})

Particulate Matter (PM) is categorised on the basis of the size of the particles. PM_{2.5} is particles with a diameter of less than 2.5µm, while PM₁₀ roughly equates to the mass of particles less than 10 µm in diameter. The very smallest particles, ultrafine PM_{0.1} (particles smaller than 0.1 microns) are thought, once inhaled, to be able to pass directly into the bloodstream.

Figure 3. Illustration of particulate matter sizeⁱ



PM is made up of a wide range of materials and arises from a variety of sources. Concentrations of PM comprises of primary particles emitted directly into the atmosphere from combustion sources. Secondary particles are formed by chemical reactions in the air. PM derives from both anthropogenic and natural sources (such as sea spray and Saharan dust). In the UK, the largest anthropogenic sources are stationary fuel combustion and transport. Road transport gives rise to primary particles from engine emissions, tyre and brake wear and other non-exhaust emissions. Other primary sources include quarrying, construction and non-road mobile sources. Secondary PM is formed when emissions of ammonia, react with sulphur dioxide or oxides of nitrogen also present as pollutants in the atmosphere.

ⁱ BHF NI Air Pollution and Mortality on the Island of Ireland 2023 <https://www.bhf.org.uk/-/media/files/what-we-do/in-your-area-northern-ireland-pages/air-pollution-and-mortality-on-the-island-of-ireland-report.pdf?rev=7f884a2856784374928acb956f2706b9&hash=B6714D212095722B95909C93C2E03279>

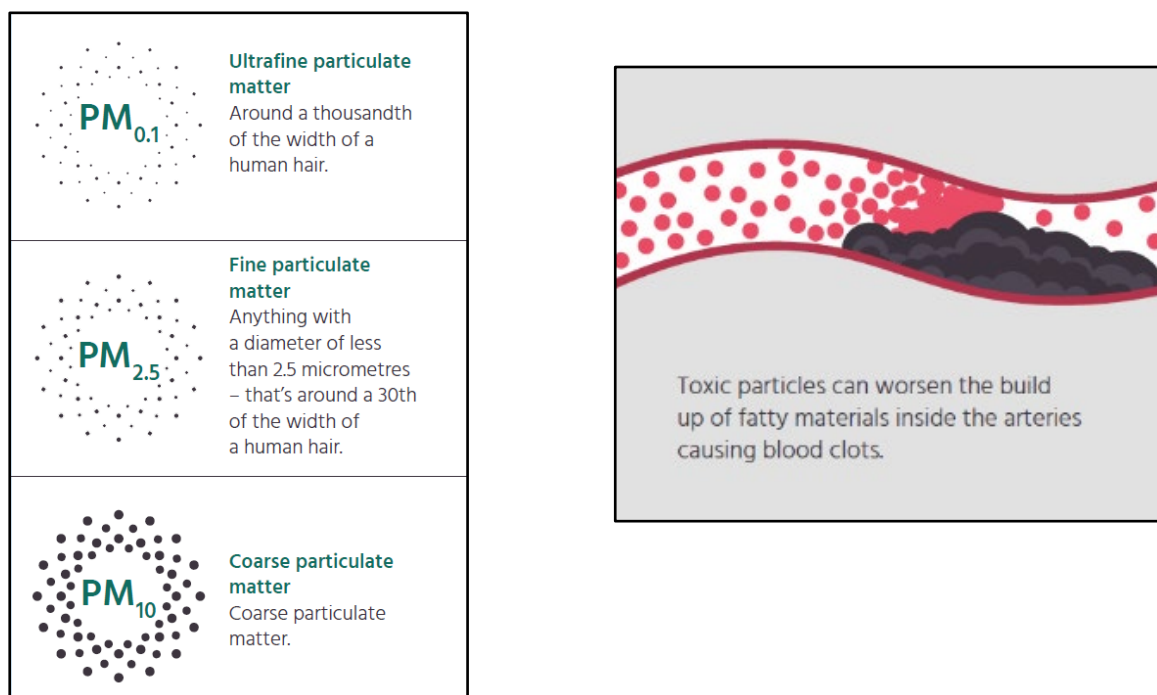
The Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013ⁱ (PPC Regulations) These Regulations made under Article 4(1) of the Environment (Northern Ireland) Order 2002, transpose Directive 2010/75/EU on industrial emissions (IED). These regulation cover a wide range of industrial emissions including those from energy industries, production and processing of metals, mineral industries, chemical industry; waste management; and a range of other activities, including intensive farming.

ⁱ The Pollution Prevention and Control (Industrial Emissions) Regulations (Northern Ireland) 2013 <https://www.legislation.gov.uk/nisr/2013/160/contents/made>

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