TERMS OF REFERENCE
Viet Nam Air Resource and Air Quality Management Review

Title: 03 National Consultants (1 NC Team Leader and 2 NCs - Experts) to develop an analysis report on existing policies and legal instruments in Vietnam and assessing applicability of international best practices for air resource and air quality management.

Project ID and title: 00085508/Strengthening Capacity on Natural Resources and Environment Policy Development and Environmental Performance Project (NREP)

Duration: September 2014 to June 2015

Duty station: Home-based and Hanoi, and travel to the field if required

Reporting: National Project Director (NPD) ISPONRE and UNDP Viet Nam

1) GENERAL BACKGROUND

Current status of air quality in Viet Nam

The status of air pollution in Vietnam at present is alarming. The 2014 Environmental Performance Index (EPI, as developed and monitored by Yale University\(^1\)) ranked Vietnam 170 out of 178 countries for air quality, thus including Vietnam among the 10 worst countries for air pollution. According to the evaluation report for the period 2005 - 2010 air quality in a large number of urban centres of Vietnam (such as Hanoi and Ho Chi Minh City), pollution problems consist mainly of dust and fine dust, especially around building and construction sites and near roads used by trucks carrying large uncovered loads of construction materials and building waste. In these areas, dust and fine dust concentrations exceeding permissible standards are quite high (about 1.5-2.5 times). In addition, the focal areas for industrial production are also home to high dust levels which exceed permissible levels. Moreover, many production facilities continue to use obsolete technology, with inefficient exhaust treatment systems, leading to large industrial emissions, exacerbated by the burning of fossil fuels, production of cement, metallurgy, and thermal power stations along with toxic gases discharged by chemical industries.

In rural areas, some localities also show signs of local pollution due to industrial production facilities, industrial complexes or from craft villages. Specifically, the rural areas near power plants, cement factories and villages involved in metal recycling, manufactured stone and terracotta tiles, dust concentration has exceeded permissible standards. Moreover, in recent years smoke pollution and dust from the burning of post-harvest rice straw has become a pressing issue.

Air pollution has caused much harm to people's health. According to statistics of the Ministry of Health, in recent years, respiratory disease incidence is very high, as a result of air pollution from dust, SO\(_2\), NOx, and CO. Apart from affecting health and lives of the people, air pollution has caused huge economic losses, through the cost of health care, medical care, loss of time due to illness in humans, crop damages, the quality of construction and materials, and tourism. Indoor air pollution remains an

\(^1\) See: http://epi.yale.edu/epi
especially potent threat for poor Vietnamese families, as it does elsewhere in Asia and in developing counties worldwide. According to WHO, 1.5 million people die prematurely each year from exposure to indoor smoke, ranking fourth in the list of serious threats to health in less developed countries, with women and children facing the greatest risks. Breathing unsafe levels of smoke indoors from the burning of burning wood, coal or other cheap fuels for cooking, more than doubles a child’s risk of serious respiratory infection and is associated with pregnancy problems, such as stillbirth and low-weight babies.

Polluted air also directly affects ecosystem health, which then impacts on human well-being. Air therefore needs to be understood and managed as a resource, like land and water, and as an essential element of the socio-ecological system. However, institutionalisation of a whole-of-Government stewardship approach to, and integrated management of, air as a resource is lacking. International lessons learned need to be applied for good air resource management.

Air resource management in Vietnam

The National Environmental Protection Strategy until 2020 vision 2030 was adopted in 2013 and included air pollution (section V, term 2, point d). The revised draft Law on Environmental Protection also includes air pollution (chapter 8 – section 5 – ART 83 – 85), but neglects the issue of in-door air pollution or the management of clean air as a natural resource.

As of the end of 2013, two projects had been instigated in MONRE: (i) ISPONRE was delegated by MONRE in early 2013 to collect materials that could serve as a foundation for a study the development of a Clean Air Act and (ii) VEA (Department of Pollution Control) was undertaking a strengthening institutional capacity for air quality management project, funded by JICA, solely focusing on improving outdoor ambient air quality in Hanoi and Ho Chi Minh City, which is ongoing.

Issues not addressed include the development of law and policy on the integrated national management of air as a resource, including the reduction of pollution from greenhouse gases from industrial production, transport, and agricultural production; the upgrading of environmental standards for setting new targets; measures for improving indoor air quality; and mixed rural-urban approaches such as the delineation of airsheds (see ANNEX) and development of airshed management plans. Carbon pollution is also a key issue in air resource management: According to MONRE Deputy Minister Bui Cach Tuyen, ‘air pollution not only has a harmful impact on human health and the economy but also is one of the reasons leading to climate change [as] the use of fossil fuels in industrial production, transport, agricultural production, cause carbon dioxide emissions.’

---

Internationally, air is increasingly being managed as a natural resource, as part of the nation’s natural capital that needs to be protected from degradation. Air pollution, as toxic waste gases, dust and particulate matter, greenhouse and ozone depleting gases, or as haze, affects the integrity of natural ecosystems and agricultural crops and degrades the visibility of scenic vistas. Together with the health costs, these impacts and their consequences for tourism and other industries have implications for all economic activity throughout the country.

Consequently clean air as a resource needs to be addressed as a cross-cutting issue in development planning and decision-making processes in urban and industrial development, land zoning and transportation planning, meteorological forecasting and climate monitoring, as well as climate change mitigation and adaptation. In this respect, delineation of regional airsheds and development of a national airshed management framework and provincial-level airshed management plans are important aspects of integrated air resource management that need to be considered in future Clean Air legislation.³

Airshed planning has emerged as an important tool for dealing with multiple pollution sources that involve numerous stakeholders and, in some cases, cross political boundaries. It is a stakeholder-driven process to coordinate the activities affecting air quality in a defined area or airshed. It recognizes that local air quality is influenced by a myriad of activities and sources, including industry, transportation, commercial and residential development, burning of biomass, road dust, and natural circumstances. Since no one jurisdiction controls all these sources, a collective approach to air quality protection is needed that can engage a variety of organizations and individuals and, where necessary, encourage partnerships with neighbouring communities.

Attention also needs to be paid to resolving the issue of integrated air resource governance, which remains particularly problematic. Under the provisions of LEP 2005 and the decree mandates of ministries, the responsibilities for air quality management remain fragmented:

1. The Ministry of Natural Resources and Environment is responsible for the implementation of the unified state management of environmental protection, including management of ambient air.

2. The Ministry of Transport is responsible for coordination with the Ministry of Natural Resources and Environment in guiding, testing and certifying environmental standards for motor vehicles; construction of transport infrastructure and transport operations; means of air quality management in traffic, and emissions problem from transport.

3. The Ministry of Construction is responsible for assigning monitoring work of environmental protection in construction activities, including implementation of strategic direction, planning and overall development of national urban policies, management solutions process of urbanization, the urban management model integrated with environmental protection; promulgate regulations, and monitoring and inspection to ensure the implementation of environmental protection requirements in construction activities, such as shielding built

buildings under construction, and the transportation of building materials to ensure no dust is dispersed into the environment.

4. The Ministry of Industry and Trade is responsible for monitoring the work of environmental protection clusters / industrial locations, villages, industrial production facilities in the locality; guiding and monitoring the implementation of mitigation measures and handling of dust, and industrial emissions.

5. The Ministry of Agriculture and Rural Development is responsible for developing and implementing the strategy, master planning, and professional development of rural villages; and to guide and supervise the implementation of the law on environmental protection in the agricultural sector.

6. The People's Committees of provinces and cities directly under the central government are responsible for directing the assignment of departments for undertaking the state management of the environment in general and the atmospheric environment in particular within their local jurisdictions.

This high fragmentation in the distribution of responsibilities among ministries, sectors, and localities is also reflected in various under-laws related to air quality management. Furthermore, urban air quality action plans need to have a comprehensive and integral approach to air pollution prevention and control to keep pace with the rapid development in urban and industrial centres. The issue of the delineation of regional airsheds and development of airshed management plans also needs serious consideration. Government actions to stop the depletion of clean air as a natural resource have already be recognised as legitimate by GATT/WTO.4

The policy system for the management and protection of air quality and prevention of air pollution is inadequate and ineffective. There are various measures to preserve clean air which are outlined in the national sustainable development strategy, environmental protection strategy, and in the Law on Environmental Protection but these provisions chiefly serve for the purpose of orientation, and have not been effectively applied in practice. The policy framework and legislation on clean air is not in evidence. Policy makers have paid attention to the classification, prevention and control of pollution sources, but have not really developed an integrated approach to the management of clean air as natural capital for healthy people and healthy ecosystems, including delineation and integrated management of airsheds and reduction of greenhouse gas emissions.

Towards a Clean Air Act.
The project “Strengthening Capacity on Natural Resources and Environment Policy Development and Environmental Performance” (NREP), with financial assistance from UNDP, has the objective to assist Government in optimally revising old and introducing major new legislation and policy, and supporting mechanisms and tools aimed at improving environmental protection, environmental performance and natural resource efficiency. In terms of air quality and air resource management, the project is embarking on a five step process, with the aim of seeing a Clean Air Act introduced into the National

---

Assembly. While clean air legislation is a known quantity elsewhere, the notion of a Clean Air Act that looks at the integrated management of air as a resource is new to Viet Nam. In particular, a roadmap of how to begin, how to proceed, and how to keep on track to achieve the legislative objective in the given time-frame remains unclear and uncertain to MONRE staff.

The Five step process can be outlined as follows:

1) Suitably qualified national consultants are required to kick-off the process by thoroughly reviewing and analyzing the extent of, as well as existing policies and legal instruments governing issues related to control of outdoor and indoor air pollution, reduction of GHG emissions and utilization and management of air as a natural resource in Viet Nam.

2) This will be followed up by a review of international best practice in methodologies and legal frameworks, and best practices and successful case studies in legislation and assessing their applicability in the Viet Nam context.

3) A final report synthesising the results of the first two steps, will be prepared by the middle of 2015, with a view to provide evidence-based recommendations on issues that need to be addressed in the development of an integrated legal framework for curbing air pollutants, reducing greenhouse gases, and for the management of air as a natural resource.

4) Preparation of a proposal for a Clean Air Act

5) Finalizing and submitting the draft law to the Prime Minister for approval in 2016, so as to be included in the law development program of the National Assembly at their first sitting in 2017.

2) OBJECTIVES OF THE ASSIGNMENT

The objective of this assignment is to produce a thorough review and analysis of existing policies and legal instruments governing issues related to clean air as a resource in Viet Nam, including integrated management for the control of air pollution and reduction of GHG emissions, matched by a review of international best practice in methodologies and legal frameworks, and best practices and successful case studies in legislation, assessing their applicability in the Viet Nam context, with a Final Report synthesising the results.

3) SPECIFIC DUTIES AND RESPONSIBILITIES

National Consultant – Team Leader (NC TL) (45 Days)

General Tasks:

As Team Leader, the main task of the NC TL is to lead, guide, supervise and coordinate the entire research process to ensure consistency of approach and outcomes, and to provide advice, guidance and quality assurance to team members. The NC TL shall assure quality of outputs, synthesise findings as the study proceeds, work collaboratively with the NCs and the PMU to finalise recommendations, draft the Final Report and make the presentation to stakeholders.
Specifically, the NC – TL will:

1. Work collaboratively with the NCs and the PMU to develop an approved work plan, including possible suggestions for field trips to provinces / Districts / Areas that could be of relevance to the assignment, as well as an iterative methodology for undertaking the assignment.

2. Work collaboratively with the Team to ensure that the Team implements the plan of the assignment as scheduled, and oversee and monitor the work of the NCs, provide quality control and iterative feedback during the course of the study, to ensure successful quality outcomes are delivered on schedule, minimizing risks to timely product delivery, and forewarning PMU on any likely delays.

3. Given that a future Clean Air Act is meant to broaden air quality regulation to include GHG pollution and regional air quality management, conduct a preliminary screening and scoping exercise of areas of regulatory concern, including related to curbing GHG pollution and managing regional air quality, in order to give necessary direction to the NCs for undertaking research in these two areas.

4. Prepare and submit a report detailing results of this screening and scoping exercise to the PMU, and continue to revise as directed until PMU final approval is confirmed.

5. Review, proof, edit and draft reports of both NCs, and discuss with NCs in order to attain quality and comprehensiveness, before finalizing and submitting the NC reports.

6. Assist two NCs to incorporate PMU comments into the Final Reports.

7. Prepare a draft Final Synthesis Report integrating findings from all NCs and including a set of recommendations and roadmap for future work, including a suggested set of air resource management areas and issues that ought to be covered in a future comprehensive Clean Air Act, and clear reasons for their selection.

8. Have the draft Final Synthesis Report agreed to and approved by PMU/UNDP, before presenting it to stakeholders for comment in a National Workshop to be organised by the PMU.

9. Incorporate stakeholder comments and finalise the Report. Include as an Annex the final results of the screening and scoping exercise, reflecting expert stakeholder consensus, on areas that may best be covered in the Law itself and those best left to be addressed in under-law.

National Consultant – Legal Specialist (NC - LS) (35 days)

The main task of the NC– Legal Specialist is to thoroughly review and analyse the adequacy of existing legal instruments in Viet Nam, including associated policies and strategies, governing the control of all forms of indoor and outdoor air pollution, including GHG emissions, with a view towards the development of a comprehensive Clean Air Act focusing on air resource management.

Specifically the NC – LS will:

1. Will assist the NC TL in preparing the work plan and work collaboratively to ensure the success of the assignment, and take direction from the NC TL in carrying out the specific duties of the mission.

2. Utilise the results of NC – TL screening and scoping exercise to conduct a thorough review that identifies and analyses gaps, overlaps, fragmentation, and inconsistencies in existing policies and
legal instruments in Viet Nam related to managing and improving overall air quality and reducing air pollution impacts on people and ecosystems through setting and improving standards and controlling outdoor and indoor air pollution in urban and rural areas, including the reduction of GHG emissions, specifically carbon dioxide (CO$_2$), methane (CH$_4$), nitrous oxide (N$_2$O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF$_6$), lead, particulates and ground-level ozone.

3. As a result of this review, detail laws and regulations needing to be harmonized as well as identifying regulatory and policy gaps that need to be filled.

4. Identify institutional strengths and weaknesses that affect the development of integrated air quality legal instruments, policies, strategies and plans, and their implementation and compliance. This should include setting and improving standards for control of gas emissions, particulates and haze, and highlight possible synergies between air management approaches across different Government agencies and possible value-added benefits of common tools or approaches.

5. Provide a summary, including a visual diagram and/or outline which summarises current harmonization and duplication / conflicts in existing law and policy regarding air quality, and legal and policy gaps that need to be filled, as well as implementation / compliance weaknesses, in order to facilitate communication and discussion on developing a roadmap for overall improved air resources management with policy-makers in MONRE and related ministries.

6. Prepare a draft Report synthesising all results and use it as a basis for consulting with experts in MONRE and related Ministries on how existing legal instruments, policies, strategies and plans governing clean air in Viet Nam may be best improved to overcome obstacles, inconsistencies, omissions and duplications.

7. With assistance and following the guidance from the NC – TL, finalise the Report.

*National Consultant – International Legal Specialist (NC – ILS) (35 days)*

The main task of the NC – ILS is to review international best practice legal frameworks, and successful case studies in policies, strategies and related legislation for managing air as a natural resource, including integrating air quality considerations into natural resource and land use planning, for controlling and reducing impacts of air pollution and greenhouse gases, and assessing their applicability in the Viet Nam context.

In doing so, the NC – ILS:

1. Will assist the NC TL in preparing the work plan and work collaboratively to ensure the success of the assignment, and take direction from the NC TL in carrying out the specific duties of the mission.

2. Conduct an overview of international experience and best practice (eg of ASEAN countries New Zealand, Canada, Australia, United States agencies, such as the California Air Resources Board, and those of the European Union), and then, with the results of NC – TL screening and scoping exercise as a guide, select and undertake an examination of a minimum of six international policies, strategies and plans for reducing emissions of short-lived and long-lived greenhouse gases, ozone-depleting substances and ground-level ozone, controlling urban and rural air
pollution, including indoor air pollution in rural and urban residential and industrial settings, and for managing regional air quality through the use of airsheds.

3. Assess lessons learned from the case studies and their applicability in the Viet Nam context to overcome problems and challenges identified in the review of the NC – LS by:
   a. Designing an analytical framework to assess lessons learned from each of the selected international case studies on the basis of criteria deemed appropriate to the Vietnam context.
   b. Reviewing the approved set of international best practices and successful case studies in legislation, on the basis of the application of the analytical framework.
   c. Show-casing those aspects of the studies which illustrate and communicate effective legal features which could be translated to the Viet Nam context to implement improved integrated air resource management.

4. Prepare a draft Report detailing results of 3 (a), (b) and (c) above and consult with experts in MONRE and related Ministries on how international policies, strategies and plans may be best utilised to overcome inconsistencies, gaps and overlaps in policies, strategies and plans governing clean air in Viet Nam and identify possible ways forward.

5. Incorporate stakeholder comments and prepare a draft Report synthesising all results.

6. With assistance from and following the guidance the NC – TL, finalise the Report.

4) DURATION OF ASSIGNMENT

Duration and Timing:

National Consultant – Team Leader (NC TL): 45 days from September 2014 to June 2015

National Consultant – Legal Specialist (NC - LS) 35 days from September 2014 to May 2015

National Consultant – International Legal Specialist (NC – ILS) 35 days from September 2014 to May 2015

Duty station: Home based and Hanoi, and travel to the field as required. In case of travel, separate travel cost including DSA will be paid by the project based on UN-EU cost norm.

5) FINAL PRODUCTS

National Consultant – Team Leader

1. Work plan and methodology for undertaking the assignment, approved by PMU.

2. Scoping Report, outlining the areas of regulatory concern for air quality management, including related to curbing GHG pollution and managing regional air quality, in order to give necessary direction to the assignment, including to the NCs for undertaking research in these two areas

3. Draft Synthesis Report integrating findings from all NCs and including a set of recommendations and roadmap for future work for presentation to workshop
4. Final Synthesis Report, including comments and feedback from Validation workshop and other experts.

**National Consultant – Legal Specialist**

1. Policy and legal instruments review.
2. Visual diagram / outline summarising legal and policy gaps, and implementation / compliance weaknesses in overall air resources management.
3. Draft Report synthesising all results, to be provided to TL for presentation at National Workshop.
4. Final Report, including all comments.

**National Consultant – International Legal Specialist**

1. Review of international policies, strategies and plans for controlling urban and rural air pollution.
2. Analytical framework to assess international approaches.
3. Draft Report synthesising all results, to be provided to TL for presentation at National Workshop.
4. Final Report, including all comments.

All products including work-plans and draft reports will be in English, final reports will be in both English and Vietnamese.

### 6) DEGREE OF EXPERTISE AND QUALIFICATIONS

**National Consultant Policy Specialist – Team Leader**

**Education:**

- Minimum of University (Masters) degree in environmental science, natural resource management or related field. PhD degree preferred.

**Experience and Competencies:**

- Minimum 10 years experience working in administration and development of environmental policy at a senior level, including the development of laws and regulations in Viet Nam, preferably with a focus on air quality management.
- Sound knowledge of current greenhouse gas emissions and air quality management policies regulations and standards in Viet Nam.
- Good network and contacts in key Government and civil society agencies dealing with indoor and outdoor air quality management.
- Experience working in international donor-funded projects an advantage.

**Language**

- Good oral and written communication skills, including in English

**Other Desirable skills:**

- Adequate computer literacy
- Good interpersonal and presentation skills.

**National Consultant – Legal Specialist**

*Education:*

- Minimum of University degree in environmental law, natural resources management law or related field. Master degree preferred.

*Experience and Competencies:*

- Minimum 5 years experience in legal issues relating to air quality management
- Sound knowledge of current legal framework for management of air quality, greenhouse gas emissions and related standards in Viet Nam
- Good network and contacts in key Government and civil society agencies dealing with legal issues relating to clean air.

*Language*

- Good oral and written communication skills, including English

*Other Desirable skills:*

- Adequate computer literacy
- Good interpersonal and presentation skills.

**National Consultant – International Legal Specialist**

*Education:*

- Minimum of University degree in environmental law, natural resources management law or related field. Master degree preferred.

*Experience and Competencies:*

- Minimum 5 years experience in legal issues relating to air quality management, with a focus on international legislation an advantage.
- Sound knowledge of current legal framework for management of air quality, greenhouse gas emissions and related standards in other countries, particularly countries with conditions similar to Viet Nam.
- Good contacts in key Government and civil society agencies dealing with legal issues relating to clean air.

*Language*

- Good oral and written communication skills, including English

*Other Desirable skills:*
- Adequate computer literacy
- Good interpersonal and presentation skills.

7) ADMINISTRATIVE SUPPORT AND REFERENCE DOCUMENTS

Documents/secondary documents
The PMU/ISPONRE will assist the selected consultant with administrative support related to, but not necessarily limited to:

- Provide a list of relevant documents/reviews in regard to clean air management/air pollution control.
- Provide a list of experts/official that can be interviewed or consulted
- Organize necessary consultative workshop and meeting(s)

Arrangement of meetings and interviews:
The consultants shall arrange and conduct all relevant all meetings and interviews as needed.

8) REVIEW TIME REQUIRED AND PAYMENT TERM
- The first payment of 20% contract value will be paid upon submission of approved work plan by ISPONRE and the NPD.
- The second payment of 40% will be paid upon the submission of draft report, with satisfactory acceptance by ISPONRE and the NPD.
- The third payment of 40% will be paid upon the completion of final products under the contract, with satisfactory acceptance by ISPONRE and the NPD.

9) CONSULTANT PRESENCE REQUIRED ON DUTY STATION/UNDP PREMISES

- NONE
- PARTIAL
- INTERMITTENT
- FULL-TIME
ANNEX – EXAMPLES OF REGULATORY ISSUES RELATING TO GHG REDUCTION AND REGIONAL AIR QUALITY MANAGEMENT THAT MAY BE SCOPED FOR A CLEAN AIR ACT.

Many GHG emission mitigation and regional air quality matters could be potentially covered by a Clean Air Act or associated regulations. These include (and are not limited to):

1. Legal basis for establishment, operation and regulation of carbon trading markets; market monitoring, reporting and verification procedures, adoption of a Vietnamese verified carbon standard; and use of offsets and allowances.

2. Designation of airsheds and regional airshed management boards for managing regional air quality.\(^5\)

3. Haze management, especially in iconic scenic tourist areas.

4. Regulation of carbon capture and storage.

5. Regulation of urban and rural indoor air pollution in public buildings and private dwellings.

6. Regulation of vehicle emissions standards.

7. Regulation of ground level ozone and black carbon.

8. Regulation of methane emissions from solid waste, including organic waste and agricultural waste.

9. Control of dark smoke.

10. Designation and supervision of smoke control areas – control of smoke emission and constraints on the types of appliances and fuels which can be used in such areas;

12. Approval of chimney heights for non-residential furnaces;

13. Control of grit and dust emissions from non-residential furnaces, including setting of thresholds.

14. Approval of new non-residential furnaces;

15. Approval of abatement equipment for use on non-residential furnaces.

\(^5\) An airshed refers to areas with common weather or meteorological conditions and sources of pollution such as industries or vehicles affecting the interchange or diffusion of pollution in the atmosphere. Legal gazetting of airsheds for regional air quality management has been done in diverse countries such as Canada, the Philippines, and New Zealand.
16. Regulation of composition of motor vehicle fuel and sulphur content of fuel oil allowed for sale and use.

17. Regulation of recycled used oils and fossil fuel products.

18. Regulation of emissions of dust, dark smoke, from commercial furnaces.

19. Regulation of commercial chimney heights

20. Regulation of burning of rubber-based products – eg tyres and cables

21. Regulation of emissions from shipping, river vessels and steam engines

22. Regulation of emissions from mine waste

23. Regulation of emissions from landfills

24. Regulation of fossil fuel emissions by households (use of coal, wood etc for cooking and heating)

25. Regulation of GHG emissions inventories.


27. Regulations of emissions estimates by stationary (point and aggregated point), area-wide, on-road mobile (gasoline and diesel), off-road mobile (gasoline, diesel, and other), and natural sources.

28. Mandatory reporting of greenhouse gas emissions from specific types of facilities, suppliers, and entities and general requirements for greenhouse gas reporting emissions, data report contents and mechanism, record keeping requirements and standardized methods.

29. Requirements for verification of greenhouse gas emissions data reports; requirements applicable to emissions data verifiers; requirements for accreditation of emissions data and offset project data report verifiers

30. Reporting requirements and calculation methods for toxic emissions estimates by: stationary (point and aggregated point) sources; on-road sources (passenger cars and trucks, motorcycles, buses, and heavy-duty trucks); off-road sources (trains, ships, and boats); natural sources of total organic gas and particulate matter for stationary, mobile, and natural sources; natural sources such as like wildfires; and designation of air toxics “hot spots” through aggregated point sources.
31. Provide a legal basis and framework for State and local air regulators to conduct a program for smoke management, including: registering and permitting of agricultural and prescribed burns; meteorological / air quality smoke management forecasting; daily burn authorization; smoke management planning and communication; alternatives to burning; and public education and outreach.

32. Environmental Management of national Air Space.