

Healthy Air Campaign

Policy call

Air pollution is one of the most serious public health risks facing us today, contributing to the earlier deaths of up to 200,000 people in the UK each year.¹

Action is required at all levels. Air pollution does not respect national borders and so we must work with our European neighbours. National action is also vital and central government must face up to its responsibilities. There is no single solution - we need a cross-government approach which tackles the sources of air pollution while maximising the co-benefits for physical activity, health inequalities, congestion and climate change.

Carcinogenic diesel is the biggest culprit and we need an urgent policy shift to reverse the 'dieselification' of the fleet and incentivise cleaner fuels and technologies. However, technology alone will not be enough. We also need:

- Reduced levels of motor traffic overall;
- a steep increase in the levels of walking and cycling and;
- to properly warn the public of the risks and how to reduce their exposure, with particular emphasis on vulnerable groups.

We, the undersigned, are calling for government to take the following urgent steps to protect our right to breathe clean air:

1. Support a more ambitious EU air package which delivers real improvements in urban air quality through strict national emissions targets.

The European Commission proposed a new package of air pollution legislation in December 2013. The legislative proposals comprise two directives which aim to cut emissions of air pollution at source, and so have an important role to play in improving air quality. However, the proposals are very weak, with no meaningful targets until 2030.²

It is vital that the UK supports ambitious action at the EU level, including strengthening the legally-binding targets for 2020 and 2030 as well as adding an additional legally-binding

¹COMEAP report:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/304641/COMEAP_mortality_effects_of_long_term_exposure.pdf

² Joint NGO assessment of the Commission proposal: <http://www.eeb.org/EEB/?LinkServID=13110E1F-5056-B741-DB5B8C89AC46D071>

target for 2025. Given that the World Health Organisation (WHO) has found health impacts for air pollution concentrations below current EU legal limits³, the UK should also support the alignment of EU ambient air quality limit values with the latest WHO health guidelines.

2. Develop and deliver a cross-government national air quality strategy.

This was one of the key recommendations of the Environmental Audit Committee (EAC) in its second report on air quality from 2011.⁴

Despite this, there is still no up-to-date national strategy (the current National Air Quality Strategy dates back to 2007).⁵ The only plans were those submitted to the European Commission as required by the EU air quality directive, which are the subject of the legal challenge in the ClientEarth case.

A new strategy is urgently needed to set out the measures needed to comply with nitrogen dioxide (NO₂) limit values in the shortest time possible. In terms of particulate matter (PM), we need to go beyond current EU limit values towards World Health Organisation guidelines in order to reduce the public health burden of poor air quality. The government needs to re-evaluate plans for biomass in light of the requirement to comply on air quality in the shortest time possible – this is already a particular problem in urban areas.

One of the main problems is that Department for Environment, Food & Rural Affairs (Defra) is responsible for air quality, with little formal role for Department for Health, Department for Transport or Department of Energy & Climate Change (DECC). Each department's ability to influence air quality should be ascertained and given a share of responsibility – along the lines of carbon budgets.

3. Set stricter national air quality objectives for 2030 which align with WHO guidelines.

The first aim of a new National Air Quality Strategy would be to achieve legal compliance with all EU ambient air quality objectives. In particular, it would need to demonstrate compliance with NO₂ limits in order to satisfy the European Commission and the UK Supreme Court. This would deliver significant health benefits.

However, recent scientific evidence has shown that merely complying with EU standards is wholly inadequate to protect human health – as air quality causes illness and death at levels well below current EU standards.^{6,7} Current EU limits for PM_{2.5} are especially inadequate (250% higher than WHO guidelines). UK policy therefore needs to set out a clear path towards compliance with WHO guidelines.

³ REVIHAAP report: http://www.euro.who.int/_data/assets/pdf_file/0020/182432/e96762-final.pdf

⁴ EAC 2011: Air quality: a follow up report:

<http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/1024/1024.pdf>

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

⁶ Cesaroni et al, *BMJ* 2014;348:f7412 <http://www.bmj.com/content/348/bmj.f7412>

⁷ WHO REVIHAAP study press release: http://europa.eu/rapid/press-release_IP-13-72_en.htm

4. Drive a dramatic decrease in the use of diesel, through a range of measures including a national network of low emission zones, and taxation changes.

Diesel exhaust has been classified by the World Health Organisation as carcinogenic for humans,⁸ and is the main source of nitrogen oxides (NOx) and ultrafine particles in cities.⁹ Various policies from successive governments have promoted the increasing uptake of diesel vehicles. The following measures would be key to reversing this trend.

a) Create a national network of Low Emission Zones to keep the most polluting diesel vehicles out of towns and cities and incentivise zero emission vehicles.

London remains the only major¹⁰ low emission zone (LEZ) in the UK, whereas Germany has over 50. LEZs have been proven to dramatically reduce particulate emissions (especially the finer particles which are thought to be especially harmful to health).¹¹ LEZs can also be very effective in tackling NO₂ – the main legal compliance problem and subject of ClientEarth's case and European Commission infringement action. ClientEarth has developed a detailed advocacy report making the case for a national network of LEZs.¹²

b) Implement changes to consumer labelling and Vehicle Excise Duty to change perceptions about diesel and reverse the growth in diesel's market share.

This is just one of 14 national policies the Mayor of London called on the UK Government to implement in his 2010 Air Quality Strategy, almost all of which were ignored.¹³ In the UK, the percentage of diesel cars increased from 9% to 24% between 1995 and 2009,¹⁴ and in July 2010, sales of new diesel vehicles outstripped petrol cars for the first time.¹⁵

Changes to other fiscal measures such as fuel duty and company car tax should also be pursued.

⁸ International Agency for Research on Cancer press release: http://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf

⁹ Clean Air in London diesel briefing: http://www.cleanair.london/wp-content/uploads/CAL-227-Reducing-NOx-emissions-from-diesel-vehicles_030413.pdf

¹⁰ i.e. affecting vehicles other than buses.

¹¹ <http://urbanaccessregulations.eu/low-emission-zones-main/impact-of-lezs>

¹² This will be published November 2014.

¹³ Clearing the Air: The Mayor's Air Quality Strategy section 5.3.9

http://www.london.gov.uk/sites/default/files/archives/Air_Quality_Strategy_v3.pdf

¹⁴ European Environment Agency website: Dieselification in the EEA <http://www.eea.europa.eu/data-and-maps/figures/dieselisation-in-the-eea>

¹⁵ https://www.london.gov.uk/sites/default/files/Air_Quality_Strategy_v3.pdf

5. Commit to measures to increase sustainable transport, which would reduce overall levels of motor traffic.

a) Government should set national targets to double the proportion of local trips made by foot, bike or public transport from 40% to 80%, and direct dedicated, sustained and significant transport investment to active travel.

Increased levels of walking, cycling and public transport are widely accepted as a cost efficient way to achieve multiple benefits to society, and this needs to be meaningfully taken on board in policy decisions. We need ambitious targets along with dedicated investment and practical measures, such as implementing 20mph limits in residential areas, which encourage walking and cycling.¹⁶ These measures can achieve health benefits through improved air quality and increased levels of physical activity, as well as added benefits of reduced congestion and reduced climate change emissions.¹⁷

Local authorities also need to play their part in achieving the step change that is needed, and the National Institute for Health and Care Excellence (NICE) has set out practical guidance on the subject.¹⁸

6. Provide better public information on air pollution, including a comprehensive warning system for pollution episodes and clinical advice.

a) A national awareness raising campaign.

This was identified by the EAC¹⁹ as the “single most important tool” to improve air quality. Improved awareness would allow people to reduce their exposure and also change their behaviour to reduce their contribution to the problem. It would also build public support for the measures that are needed.

¹⁶ 20mph limits are one measure that can help people feel safe to encourage them to walk and cycle. A study from the Commission for Integrated Transport in 2001 found that where cities have 20mph speed limits covering between 65% and 85% of the street network, they are transformed “from being noisy, polluted places into vibrant, people-centred environments.” 50% of respondents claimed their neighbourhoods were more pleasant places to live and 60% believed that more children played in the streets.
<http://webarchive.nationalarchives.gov.uk/20110304132839/http://cfit.independent.gov.uk/pubs/2001/ebp/ebp/key/pdf/key.pdf>

¹⁷ Take Action on Active Travel: http://www.fph.org.uk/uploads/Take_action_on_active_travel.pdf

¹⁸ <http://www.nice.org.uk/guidance/ph41>

¹⁹ EAC 2011: Air quality: a follow up report:

<http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenvaud/1024/1024.pdf> (para 52)

b) A comprehensive early warning system for PM and ozone episodes, with priority given to communication channels specifically for vulnerable groups.

Short term exposure to high levels of air pollution can pose a threat to the health of the general population as well as markedly exacerbate symptoms for those with conditions such as asthma, COPD and heart disease. Children and older people are particularly vulnerable, and government advice to members of the public is to reduce levels of outdoor activity during high levels of pollution, if they are experiencing discomfort.

The government has a legal and moral responsibility to, as far as possible, ensure accurate prediction of pollution episodes, and warn the public so that people can take actions to reduce their exposure. The current approach needs to be significantly strengthened and should utilise a wide range of media (e.g. TV weather forecasts, newspapers, radio and internet), and include specific communication channels to warn those most vulnerable.

c) Clinical advice to include information on air pollution exposure to relevant patients.

Currently, clinical advice about managing relevant conditions does not routinely include information on the effect of exposure to high levels of air pollution.

The 2014 National Review of Asthma Deaths²⁰ identified that 'at least 49% of people who died never had their triggers recorded in their medical notes and so may never have been told how to avoid them.'

The National Institute of Health and Care Excellence should examine relevant care pathways with an aim of consistently including this advice, working with relevant bodies such as the Royal College of GPs.

²⁰ National Review of Asthma Deaths <https://www.rcplondon.ac.uk/projects/national-review-asthma-deaths>

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The Healthy Air Campaign is a coalition of health, environment and transport groups coordinated by ClientEarth.

We work to raise awareness and demand political action to reduce air pollution, particularly in our towns and cities.

