

Written evidence submitted by Imperial College London (AQU0089)

Imperial College London's written submission to the Environment, Food and Rural Affairs inquiry on air quality – summary of roundtable with peers on the Environment Bill

Overview

1. This short submission provides an overview of a virtual roundtable on 22 October 2020 which was organised jointly between Imperial College London and the London School of Economics (LSE) with peers about the Environment Bill, focusing specifically on air quality. The aim of this event was to inform peers about the research of some of our academics specialising in air quality and provide insights about the legislation as it progresses towards the House of Lords.
2. Chaired by Lord Teverson, Chair of the Lords EU Environment Sub-Committee, Imperial academics Professor Frank Kelly, Dr Audrey de Nazelle and Dr Marc Stettler and LSE economist Dr Sefi Roth presented their research around air quality and outlined how the bill, and wider government policy, can be most effective at improving air quality.
3. Academic speakers and parliamentarians agreed that the Environment Bill, and the creation of the new Office for Environmental Protection (OEP), presents an opportunity to significantly improve environmental standards, including in relation to air quality. For this to happen, it is crucial that the government is ambitious in the setting of its targets, a wide range of metrics are considered, there is joined-up thinking across government, there is adequate support for local measures, and that the OEP is sufficiently powerful and independent from central government.

Key areas for consideration

4. In relation to air quality, the Environment Bill currently only contains a statutory requirement to reduce PM_{2.5} pollution. It is crucial that the government and OEP has robust, ambitious targets for reducing air pollution which are based on metrics wider than just PM_{2.5}.
5. There should be a focus on following World Health Organization (WHO) guidelines on reducing air pollution rather than current EU targets which are less ambitious.
6. Targets on air quality should be set nationally rather than using regional target values to avoid pollution 'hot spots' in certain areas. The use of daily limits for air pollution as well as yearly ones would also stop extremes being masked through averages.
7. Attendees raised concerns about the wording in Clause 3 that "before making regulations... which set or amend a target the Secretary of State must be satisfied that the target, or amended target, can be met", as this clause as currently drafted leaves too much room for interpretation.
8. The Office for Environmental Protection (OEP) should ensure joined-up thinking across government, recognising the connections between air quality and other issues like climate change, construction, health and inequalities.
9. Attendees generally welcomed that the Environment Bill recognises the crucial role which local authorities and other partners have to play in tackling air pollution. However, it is important that local authorities have sufficient funding to ensure that they can implement robust local measures to improve air quality. It is also vital that measures are effectively evaluated and best practice is shared at a national level.
10. Government figures show that agriculture is responsible for 88% of ammonia emissions and 68% of nitrous oxide emissions in the UK. Despite this, there has been limited concerted action to

reduce agricultural emissions in recent years. The OEP, and wider government initiatives, should consider how to effectively reduce air pollution from agriculture.

11. The government should start preparing for future regulation of pollutants which are not currently regulated but there is evidence that they have harmful health effects, such as ultrafine particles and elemental carbon, by improving monitoring of these particles.
12. It is important that the Environment Bill ensures that the OEP is independent of government and has sufficient powers to hold authorities to account on environmental targets. Several parliamentarians raised the issue that under current plans the OEP will not be able to fine the government if it misses targets and a lack of other sanctions.

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