

Cynulliad Cenedlaethol Cymru
Y Pwyllgor Newid Hinsawdd,
Amgylchedd a Materion Gwledig
Ansawdd Aer
NHAMC (5) AA10
Ymateb gan Coleg Brenhinol y
Meddygon

National Assembly for Wales
Climate Change, Environment and
Rural Affairs Committee
Air Quality
CCERA(5) AQ10
Evidence from Royal College of
Physicians

RCP Cymru welcomes the opportunity to respond to the Climate Change, Environment and Rural Affairs Committee's inquiry into air quality. worked with consultant physicians, trainee and specialty doctors, and members of our patient and carer network in Wales to produce this response. We will be happy to organise further written or oral evidence if that would be helpful.

Summary of evidence

- Each year in the UK, around 40,000 deaths are attributable to exposure to outdoor air pollution, with more linked also to exposure to indoor pollutants¹.
- Wales should introduce a Clean Air Act before the Senedd 2021 elections to reduce the impact of air pollution and improve the health of people living and working in Wales.
- There is no level of exposure to air pollution that is safe with multiple organs being affected.
- The Welsh Government should continue to work with EU partners to ensure Brexit is not used as an opportunity to weaken laws and regulations relating to air pollution and smoking.
- National and local authorities throughout the world are tackling car air pollution by introducing odd-even vehicle bans and promoting public transport. National authorities in Europe aim to reduce the wider cause of air pollution by reducing the total national emissions of sulphur dioxide, nitrogen oxides (NOx), ammonia and particulates.
- The Welsh Government should seek to improve public transport schemes across Wales so the Welsh population are not reliant on cars as a means of transport
- Responsibility for monitoring, assessing and implementing the Local Air Quality Management regime should be shared by the whole system. The Welsh Government must provide support for LAs, including funding.

Introduction

The Royal College of Physicians and the Royal College of Paediatrics and Child Health (RCPCH) have produced two reports highlighting the damaging effects of air pollution. *Every breath we take: The lifelong impact of air pollution (2016)* and *The inside story: Health effects of indoor air quality on children and young people (2020)*².

The reports highlight that harm from air pollution is not just associated with poor health over short periods. It is a long-term problem that can begin at conception and occur across a lifetime.

The Welsh Government's Healthy Air Healthy Wales strategy plan will assist in the development of a healthier living conditions for Wales. Nevertheless, much more needs to be done to address air pollution and health related illnesses.

What regulatory gaps or issues will need to be addressed after the UK leaves the EU? How should these be addressed and what will be the main challenges?

The Welsh Government should ensure Brexit is not used as an opportunity to weaken laws and regulations relating to air pollution. The government should:

- consolidate the complex and disparate body of domestic, EU and international air pollution laws into one coherent and effective clean air act
- enshrine World Health Organisation (WHO) guidelines³ in law
- continue to work with EU institutions in responding to the challenge of tackling air pollution, otherwise Wales may be unable to meet the WHO's air pollution standards
- Introduce and maintain an integrated pollution prevention and control regulatory regime, including a process for reviewing and updating best available techniques
- produce a statutory 5 year air quality strategy to monitor weakness in legislation
- introduce 'right to breath' legislation, obliging local authorities to inform vulnerable groups when certain levels breach recommended guidance
- cigarette smoke is a pollutant and must be monitored post Brexit to ensure the Welsh Government continues to meet the requirements of EU regulations.

Are the Welsh Government's proposals for a Clean Air Act appropriate? How could they be improved?

We welcome the introduction of the Clean Air Plan for Wales and the path it sets out to urgently address the levels of air pollution and improve overall air quality.

Funding

An initial concern, shared with Healthy Air Cymru, is the lack of clear funding plans to accompany the ambition of *Healthy Air Healthy Wales* and a Clean Air Act. RCP Cymru welcomes reforms at a local authority level that allow for local authorities (LA) to develop and incorporate plans to address air pollution. However, there are concerns that the already stretched LAs in Wales may not have sufficient funding to successfully implement a Clean Air Act. The Welsh Government should work with LA's to develop a Clean Air Act that can be successfully implemented at a local level.

Legislative timeline

While legislative time may not allow the introduction of a Clean Air Act now, campaign work should begin at a much earlier stage. It will help to change behaviour and thereby begin to reduce the level of air pollution. Healthy Air Healthy Wales proposed a review the benefits of the Transport (Scotland) Bill and the UK Environment (Principles and Governance) Bill. We are concerned as to whether the bills will have been implemented for a sufficient amount of time for their benefits to be assessed. The Welsh government should aim to review the success of environment acts and air quality initiatives outside of the United Kingdom.

What can be learned from legislative approaches elsewhere?

London

The Mayor of London's transport⁴ and environment strategies⁵ have set out a number of ambitious and bold solutions to tackling London's illegal levels of air pollution. Changing the way people travel so that, by 2041, 80% of all Londoners' trips will be made on foot, by cycle or by public transport will reduce air pollution levels and unlock health benefits resulting from improved air quality. London has recently introduced a toxicity-charge and ultra-low emission zone (ULEZ). Phasing out pure diesel buses and ensuring no diesel taxi will be licensed from 2018 will also go some way to tackling London's air pollution. The Mayor of London aims to ensure all newly licensed taxis are electric and zero emissions⁶. Transport for London's decision to invest in cost-effective measures that deliver improvements in public health will set an example for local authorities across the UK considering such interventions.

France

To comply with the legal requirements of the EU, the French government introduced the Mobility Act 2018. According to the law, areas with more than

100,000 inhabitants or with an Air Protection Plan must have established permanent or temporary environmental zones on their territory by the end of 2020⁷.

Paris

Since 2015 the city has imposed odd-even bans on vehicles⁸, made public transport free during major pollution events and encourages car and bike sharing programmes. A long section of the Right Bank of the river Seine is now car-free and a monthly ban on cars has come into force along the Champs-Élysées⁹. In 2019 Paris decided to tighten the driving bans on the basis of the French antipollution sticker for a trial period of 3 years. From that date on, only vehicles with a French antipollution sticker E, 1, 2 and 3 are allowed to drive¹⁰.

The Netherlands

The Dutch government has recently outlined plans to make all new cars emission free by 2030¹¹. The city of Amsterdam published a Clean Air plan 2019 that aims to meet the World Health Organisation's air quality guidelines from 2030 and achieve zero admission by 2030¹².

Helsinki, Finland

The Finnish capital has drastically reduced the number of cars on its streets by investing heavily in better public transport, imposing higher parking fees, encouraging bikes and walking and converting inner city ring roads into residential and walking areas. The idea is to make the city's public transport so good that no one will want to own a car by 2050.

Germany

The German government has adopted a Clean Air Programme, which lays out how the country aims to improve air quality over the coming decade. The programme looks at percentage reductions of total national emissions of certain atmospheric pollutants, including sulphur dioxide, nitrogen oxides (NOx), ammonia and particulates. The programme will lay down environmental quality standards, set emission ceilings and regulate products¹³.

What are your views on the regulatory proposals in relation to the Local Air Quality Management (LAQM) regime? What are the main challenges in relation the proposed approach?

The Welsh Government should ensure Wales meets, if not exceeds, EU environmental standards. It should enshrine WHO standards in law.

In principle RCP Cymru welcomes the modernisation of the LAQM to ensure 'hot-spots' are monitored and addressed appropriately. The plans are ambitious in their assessment of pollutants and efforts to increase public engagement. As air quality is worse in areas of deprivation, the plan will address health-inequalities and reduce health related illnesses of those living and travelling through those areas. Responsibility for managing, reviewing and assessing air quality cannot be placed on LAs alone, because LAs may be overwhelmed by air quality measures. Responsibility for monitoring, assessing and implementing strategies should be shared by the whole system. The Welsh Government must provide support for LAs, including funding.

What are your views on the regulatory proposals relating to domestic combustion (including fireworks/bonfires), road vehicle idling and Clean Air Zones/Low Emission Zones?

There is popular demand for Clean Air Zones (CAZ) and Low Emission Zones (LEZ) in Wales, following the successful implementation of Ultra Low Emission Zones in London. Countries across the world have introduced CAZ and LEZ in their capitals and major cities.

The Welsh Government should support LAs to introduce air quality measures. Cardiff City Council has recently published a white paper proposing a 'Road User Charging Scheme'¹⁴ and would use the funds raised to promote a model shift for transport in Cardiff. The Welsh Government should support the white paper and seek to do the same for other LA proposals.

What are the main challenges in introducing a legislative framework for air quality as set out in the consultation document?

Primary vs Secondary legislation

An assessment, carried out by the Welsh Government, is required of the document to determine whether primary legislation is necessary. This would challenge the Welsh government to collaborate with the Westminster government to ensure the approach measures are taken. The Welsh government should review the Westminster Environment (2019) Bill to assess the measures that cover England and Wales and those that are four-nation measures.

Post EU

The Welsh Government should continue to work with EU institutions to tackle air pollution.

Without such cooperation, Wales may be unable to meet the WHO's air pollution standards.

The emphasis on local authorities

The document places most of the responsibility on LAs. The Welsh Government must support LAs to successfully introduce, manage and assess initiatives.

The improvement of public transport

The transport links in Wales are poor, especially in rural areas. The Welsh government should promote public transport schemes with the ambition to make cars undesirable. The Welsh government should example clean air and transport policies from Helsinki. Improving public transport and decreasing the public's dependability on cars would greatly reduce air pollution.

Further Reading

Royal College of Peds and Child Health (RCPCH) and Royal College of Physicians (RCP) (2020). *The inside story: Health effects of indoor air quality on children and young people*.

Royal College of Peds and Child Health (RCPCH) and Royal College of Physicians (RCP) (2016). *Every breath we take: the lifelong impact of air pollution*. Report of a working party.

About us

The Royal College of Physicians (Wales) plays a leading role in the delivery of high quality patient care by setting standards of medical practice and promoting clinical excellence. We provide physicians in Wales and across the world with education, training and support throughout their careers. As an independent body representing more than 37,000 fellows and members worldwide, including 1,300 in Wales, we advise and work with government, the public, patients and other professions to improve health and healthcare.

^{1 1} Royal College of Peds and Child Health (RCPCH) and Royal College of Physicians (RCP) (2020). *Every breath we take*. <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution> ² Royal College of Peds and Child Health (RCPCH) and Royal College of Physicians (RCP) (2020). *The inside story*:

Health effects of indoor air quality on children and young people.

https://www.rcpch.ac.uk/sites/default/files/2020-01/the-inside-story-report_january-2020.pdf.

³ World Health Organisation 2017 *WHO Ambient (outdoor) air quality and health*. <http://www.who.int/mediacentre/factsheets/fs313/en/>

⁴ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/draft-london-environment-strategy-have-your-say> ⁵ See Above (5). ⁶ See Above (5)

⁷ <https://www.lez-france.fr/nc/en/general-information/future-environmental-zones.html#c119277> ⁸ <https://www.theguardian.com/world/2016/dec/07/paris-bans-cars-for-second-day-running-as-pollutionstrikes>.

⁹ <https://www.theguardian.com/cities/2016/sep/26/paris-council-approves-ban-vehicles-right-bank-seineroad>.

¹⁰ <https://www.lez-france.fr/nc/en/french-environmental-zones-zcr/paris-zone-zcr.html#c18096>.

¹¹ <https://electrek.co/2017/10/10/netherlands-dutch-ban-petrol-diesel-cars-2030-electric-cars/>.

¹² <https://www.amsterdam.nl/en/policy/sustainability/clean-air/>.

¹³ German Government 2018. *Clean Air - Made in Germany* http://www.german-sustainable-mobility.de/wpcontent/uploads/2014/12/CleanAir-MadeInGermany_GPSM.pdf.

¹⁴ Cardiff Council 2020 *Parking, Roads and Travel Transport White Paper*.

<https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/transport-white-paper/Documents/White%20Paper%20for%20Cardiff%20Transport%202019.pdf>.