

The Rt. Hon. Therese Coffey MP
Secretary of State for Environment, Food and Rural Affairs
c/- AQS Review
Air Quality and Industrial Emissions Team
Defra
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By email: AQSreview@defra.gov.uk

21 April 2023

Dear Secretary of State

Consultation on the draft revised Air Quality Strategy

I am writing on behalf of Clean Air in London (CAL) in response to Defra's consultation on the draft revised air quality strategy ("draft AQS") to be set under the Environment Act 2021. This letter touches on the ambition level that should be set by the Government and other matters.

CAL's mission is to achieve, urgently and sustainably, full compliance with the World Health Organisation's ("WHO's") air quality guidelines throughout London and elsewhere. Further details about CAL can be found at <https://cleanair.london/>. It was founded in 2006.

CAL is independent of any government funding, has cross-party support and a large number of supporters, both individuals and organisations. CAL provides a channel for both public concern and expert opinion on air pollution.

This consultation is obviously inadequate

To be lawful, a consultation exercise – carried out by a public authority in relation to a proposed decision – must be conducted at a time when proposals are at a sufficiently formative stage, include adequate information to inform a proper and informed response, allow enough time for a proper and informed response to be submitted and allow sufficient time for the public authority to consider those responses.

CAL has read the consultation paper, and it is clear, as outlined below, that the information it contains is inadequate to inform a proper and full response.

This consultation is being held over a period of only 10 calendar days. The period includes local authority purdah in advance of the May elections¹ (and a Bank Holiday Monday in the immediate post public consultation period²). It is crystal clear that these arrangements for this consultation are

¹ <https://commonslibrary.parliament.uk/research-briefings/sn05262/>

² Note: Defra says it must publish the final Air Quality Strategy by 1 May 2023 in accordance with Schedule 11 of the Environment Act 2021² and subsection 4 of the Environment Act 2021 (Commencement No. 2 and Saving Provision) Regulations 2022². This is no excuse for launching a late and inadequate consultation.

inadequate. Local authorities who perceive the proposed decision to be politically controversial, because they disagree with it, are less likely to respond than local authorities who agree with it and therefore do not perceive it to be controversial. Other people and organisations will simply not have the time to grapple with the consultation document, including its omissions and the important issues that the strategy raises, in such a short period.

It follows that any decision informed by this flawed consultation must itself be flawed. CAL therefore calls for a re-consultation on the proposed Air Quality Strategy and decision.

Note 1: Defra says it must publish the final Air Quality Strategy by 1 May 2023 in accordance with Schedule 11 of the Environment Act 2021³ and subsection 4 of the Environment Act 2021 (Commencement No. 2 and Saving Provision) Regulations 2022⁴.

Note 2: Even Defra's own consultation document says "This consultation runs for 2 weeks. It opens on 11 April and closes on 21 April 2023" (page 6) i.e. 10 calendar days. The fact that it includes obvious other mistakes such as "[hyperlink]" on page 4 suggests that it was rushed out late.

Introduction

CAL calls for the Government to commit to achieve full compliance with the WHO's latest air quality guidelines and good practice statements, including fine particulate matter (PM_{2.5}) and ultrafines (PM_{0.1}), by 1 January 2028 with annual review and enforcement thereafter. This objective is necessary to protect public health and achievable. It should be seen in the context of commitments made in the City of London (Various Powers) Act 1954 which banned smoke from premises (from 1 October 1955), the Clean Air Act 1956 (which allowed seven years) and the UK's obligations under the Air Quality Directive 2008/50/EC for nitrogen dioxide (set in June 2008 to be achieved by 1 January 2010 with the possibility of a five year time extension subject to strict conditions). The Clean Air (Human Rights) Bill suggests a similar time extension mechanism of up to five years.

The WHO published new air quality guidelines on 21 September 2021⁵ including an annual mean for PM_{2.5} of 5 µg/m³. The WHO said that "these guidelines are expected to remain valid for a period of up to 10 years". It has found no level of exposure below which it is 'risk-free' so further guidelines are likely to be lower.

It is impossible for CAL to respond properly or fully to Defra's consultation in such a short timescale. This impossible position has been made more difficult by the extraordinary lack of detail in the draft Revised Air Quality Strategy (which totals 41 pages compared to the 342 page, two-volume Air Quality Strategy published in 2007). It is insulting to the memory of those who wrote the 2007 strategy to suggest that the draft AQS is "a replacement for the 2007 strategy" (page 4 of the consultation document). Nor is the draft AQS an adequate supplement to the Clean Air Strategy 2019⁶ which "set[s] out the comprehensive actions required across all parts of government and society to improve air quality". The draft AQS mainly includes case studies, descriptions of work being done by other departments, platitudes and onerous new obligations on local authorities that smack of "passing the buck" and micro-managing "inputs" instead of facilitating the achievement of "outputs".

³ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

⁴ <https://www.legislation.gov.uk/ukxi/2022/48/regulation/4/made>

⁵ <https://cleanair.london/hot-topics/new-who-air-quality-guidelines/>

⁶ <https://www.gov.uk/government/publications/clean-air-strategy-2019>

In the short time available, CAL points Defra to the further following matters or documents which should be properly considered before Defra re-consults and publishes any form of ‘revised’ or ‘modified’ national air quality strategy (whether to achieve alleged compliance with Schedule 11 of the Environment Act 2021⁷ or otherwise). This list is not exclusive for reasons explained earlier. Please therefore review and appropriately modify the draft AQS to fully address the following before re-consulting:

Lessons from the Great Smog

1. Please learn the greatest lesson from the Great Smog of 1952 which is to take action⁸.
2. The City of London (Various Powers) Act 1954⁹ showed the scale, speed and type of action needed following the Great Smog.
3. The Clean Air Acts 1956¹⁰, 1968¹¹ and 1993¹² need to be updated for modern fuels, technologies and circumstances. Please review the work done for the Red Tape Challenge and related analyses and reports¹³ which seem to have been largely ignored by Defra.
4. The Clean Air (Human Rights) Bill¹⁴ shows what action is needed. It has cleared all legislative stages in the House of Lords after Baroness Jones topped the ballot of private members bills on 12 May 2022. This excellent Bill was thoroughly scrutinised and debated in the House of Lords including by the Delegated Powers and Regulatory Reform Committee. It could quickly and easily be strengthened further with advice from government officials and experts based on lessons from the Red Tape Challenge and related work¹⁵ and by the addition of new powers for local authorities (as suggested below).

Actual and expected legal breaches

5. Defra admits it has breached the annual mean limit value for nitrogen dioxide (NO₂) in every year since 2010¹⁶.
6. Defra admitted breaching the single annual emission ceiling for PM_{2.5} applicable to both the NECR and the CLRTAP for 2021 on 22 February 2023¹⁷.
7. The UK Informative Inventory Report (1990 to 2021) published on 15 March 2023¹⁸ shows the scale of action needed now and up to 2030 and beyond.
8. The Opinion by Catherine Dobson in relation to current and prospective breaches of the NECR and CLRTAP¹⁹ (dated 17 December 2021) and Harrison Grant Solicitors’ letter to the Government Legal Department dated 20 January 2022²⁰. Please consider them in relation to this consultation.

⁷ <https://www.legislation.gov.uk/ukpga/2021/30/schedule/11/enacted>

⁸ <https://cleanair.london/health/great-smog/>

⁹ https://cleanair.london/app/uploads/City-of-London_VP_Act-1954-2.pdf

¹⁰ <https://www.legislation.gov.uk/ukpga/Eliz2/4-5/52/enacted>

¹¹ <https://www.legislation.gov.uk/ukpga/1968/62/contents/enacted>

¹² <https://www.legislation.gov.uk/ukpga/1993/11/contents>

¹³ <https://cleanair.london/clean-air-act/>

¹⁴ <https://bills.parliament.uk/bills/3161>

¹⁵ <https://cleanair.london/clean-air-act/>

¹⁶ <https://uk-air.defra.gov.uk/library/annualreport/index>

¹⁷ <https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-background>

¹⁸ https://uk-air.defra.gov.uk/assets/documents/reports/cat09/2303151609_UK_IIR_2023_Submission.pdf

¹⁹ https://cleanair.london/app/uploads/CAL-433-Catherine-Dobson-advice-re-NECR_Final-171221.pdf

²⁰ https://cleanair.london/app/uploads/CAL-433-HG-letter-to-GLD-Defra-final-200122_Redacted.pdf

9. It is not reasonable for Defra to isolate consideration of “concentrations” from “emissions” as Defra seems to be doing in the draft AQS given that emissions become (primary or secondary) concentrations.

Governance

10. CAL warmly welcomes the leadership by DLUHC on wider planning reforms that will reduce emissions and improve air quality, including indoor air.
11. Why is the draft AQS focused almost entirely on the micro-management of “inputs” by local authorities? What work is Defra doing itself to reduce air pollution e.g. from ammonia or wood burning?
12. Please demonstrate that Defra has fully considered the recommendations of all the select committee inquiries into air quality since the EAC’s first inquiry in 2009/2010 and their related NAO reports.
13. Please recognise that the United Nations General Assembly adopted a resolution recognising the right to a clean, healthy and sustainable environment as a human right on 28 July 2022²¹.
14. CAL will respond separately to DLUHC’s consultation on Environmental Outcomes Reports which closes on 9 June 2023²².
15. Why does Defra cite 2020 emissions data on page 4 of the separate consultation document when it published 2021 data in February 2023? Why has Defra not highlighted flat or rising trends for ammonia and PM_{2.5} combustion emissions in the last decade?
16. Defra’s reference list of air quality documents in Annex B appears arbitrary and incomplete. For example, it includes reference to Defra’s annual update on emissions²³ but not concentrations of major air pollutant in the UK²⁴ and fails to mention the Chief Medical Officer’s Annual Report on Air Pollution which was published on 8 December 2022. It also includes a number of links to webpages rather than specific named documents which is inappropriate for a major governance document.
17. Please check 6.4 National Emissions Ceilings (Regulations?) on page 39 e.g. it shows a PM_{2.5} ceiling of 89kt between 2020 and 2029 compared to 80.8kt in the national emission statistics release in February 2023²⁵.

Compliance with the WHO’s new air quality guidelines

18. Please follow the recommendations included in CAL’s proposed pathway for the UK to achieve full compliance with WHO’s AQGs for PM_{2.5} by 2030²⁶.
19. Please include the Interim targets for PM_{2.5} (January 2028) in section 5.1 on page 33.
20. The limits in Annex A of the draft AQS should be updated to match the WHO’s new air quality guidelines. Annex B fails to include the latest WHO air quality guidelines (21 September 2021).
21. The draft AQS must also take full account of the Report to Prevent Future Deaths (20 April 2021) following the inquest touching on the tragic death of Ella Roberta Adoo Kissi-Debrah, aged nine²⁷.

<https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

²¹ <https://cleanair.london/app/uploads/CAL-455-UNGA-R2HE-resolution-adopted-280722.pdf>

²² <https://consult.levellingup.gov.uk/planning/environmental-outcomes-report/>

²³ <https://www.gov.uk/government/statistics/emissions-of-air-pollutants>

²⁴ <https://www.gov.uk/government/statistics/air-quality-statistics>

²⁵ <https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-background>

²⁶ https://cleanair.london/app/uploads/CAL-467-Achieving-WHO-AQGs-asap_080822.pdf

²⁷ <https://cleanair.london/hot-topics/ellaslaw/>

Actions for Local Partners

22. CAL supports the imposition of stronger duties on local and other public authorities to comply fully with the WHO's new air quality guidelines and legal limits including the PM_{2.5} targets for 2028 i.e. "outcomes". It does not support the imposition by Defra of micro-managed "inputs" e.g. parts of bullet points 2 and point 4 under Actions for Local Partners – 2 (page 11). Please refer to the IMF's report showing that "*The estimated multipliers associated with green spending are about 2 to 7 times larger than those associated with non-eco-friendly expenditure, depending on sectors, technologies and horizons*"²⁸. The task of public authorities and others is to determine the most cost-effective route(s) to comply with their obligations not to endlessly reinvent the wheel of new cost-benefit studies as Defra is suggesting.
23. Defra is putting strict duties on local authorities while failing to give them the powers they want and need to control harmful emissions. For example, Defra's proposed 'Actions for local partners' says that "Local authorities should robustly assess the monetised benefits of air quality interventions, implementing those which boost healthy life expectancy and are economically beneficial to the areas." Frankly, this is a ridiculous hurdle to set for public authorities when the obligations they need to meet are set at a national level; it smacks of micro-management of 'inputs' not 'outputs' by ministers or officials. Imagine the consequential deaths if such requirements were imposed on the health service. Please scrap this and similar unreasonable requirements on "inputs". Defra's warning to local authorities to avoid trade-offs and tensions when tackling climate change and air quality is poorly worded. Put simply, public authorities should prioritise "zero air emission" solutions to protect health, the environment and the climate.
24. Public authorities need to be given more powers to achieve "outputs" and not additional obligations on "inputs" so that they can get on with the vital task of protecting public health, the environment and the climate and complying fully with vital outcomes including the WHO's new guidelines.
25. Please introduce a statutory duty on local authorities that strengthens the requirement on them to support the delivery of national PM_{2.5} targets i.e. "outputs" (while giving them greater powers).
26. The Department of Health and Social Care should take over from Defra in the provision of high quality, accurate air quality information available to the public after many years of failure by the latter (see section below). This would be much more cost effective than asking each local authority to undertake the task in a hotchpotch fashion (pages 17 and 18 of the draft AQS).
27. Please ensure continuity of reporting if Defra modifies the zones or agglomerations used for reporting air quality in the UK. At a minimum, it will be important to maintain fully the current monitoring, information and reporting for comparison purposes and scientific and other research e.g. to identify trends and assess which policies are the most cost effective.

Domestic wood and other burning

28. Please give local authorities powers to issue on-the-spot fines if smoke is emitted from a chimneys in any urban area. The City of London (Various Powers) Act 1954 said that "No smoke should be emitted from premises in the City of London". That was 69 years ago.
29. No smoke should be emitted from new or old wood burning stoves.

²⁸ <https://www.gov.uk/research-for-development-outputs/building-back-better-how-big-are-green-spending-multipliers>

30. The Climate Change Committee's ("CCC's") long-standing advice²⁹ is *"that government should not support wood-burning stoves as part of climate policy and that their use should be phased out over time"*³⁰. Defra has provided no evidence that it is aware of this advice or considered it.
31. The CCC's advice to government is to not support any biomass for heat in urban areas because of the air quality impacts.
32. The CCC's advice on wood burners is that they should not be counted towards either low-carbon heat targets or renewables targets.
33. The CCC makes clear that wood burners are not a desirable policy outcome based on their inefficient heat generation, air quality impacts and the suboptimal use of finite bioenergy resources.
34. Ecodesign requirements for wood burning stoves (only) entered into force from 1 January 2022. They were an important step on the path to banning wood burning for heat but have many weaknesses (as CAL has highlighted)³¹.
35. Please consider early evidence from Defra's study to measure pollutant emissions from burning solid fuels in a range of domestic appliances under real-world conditions. Geraint Davies MP has asked many parliamentary questions that highlight the problems of wood burning³².
36. Defra needs a comparative assessment of (a) laboratory test standards and (b) real work conditions for an assessment wood burning stoves in the context of the Ecodesign regulations 2022. Please see question 14 and others here <https://cleanair.london/hot-topics/clean-air-in-london-exposes-cosy-world-of-the-wood-stove-industry/>.
37. There are problems with the Ecodesign legislation for wood burning stoves including the different methods for testing stove emissions to determine what test methods are most reliable for wood burning stoves in the context of the EU Ecodesign Regulations 2022³³ and more generally.
38. Defra should not shift an emissions problem from old wood burning stoves to new ones.
39. Defra's annual update on concentrations of major air pollutants in the UK is due at 930am on Thursday 27 April 2023³⁴. Defra's recent emissions statistics highlighted the worsening wood burning problem.
40. Smoke Control Areas and emission standards for Manufactured Solid Fuels need to be strengthened to reduce both smoke emissions and sulphur levels in the very short term on a path to phasing out domestic wood burning for heating in urban areas by January 2028.
41. Serious questions remain about the cosy world of the wood burning stove industry and its regulators following an investigation by Clean Air in London³⁵ and the release of information by Defra during a subsequent investigation by the Information Commissioners' Office (see decision notice reference IC-164990-H8L7 dated 6 April 2023)³⁶.
42. Other forms of domestic burning also need to be more effectively controlled and phased out. Your never-ending approach of delaying action, launching (two year) reviews and publishing 'guidance' fails to respond to the health and climate emergencies.
43. Please fully consider CAL's research into the wood burning industry and follow all our recommendations including:

²⁹ <https://cleanair.london/health/ban-domestic-wood-burning-in-urban-areas/>

³⁰ https://cleanair.london/app/uploads/CAL-429-CCC-covering-letter-reply-211221_EIR-UK-Health-Expert-Advisory-Group-Report.pdf

³¹ <https://cleanair.london/health/implementation-of-ecodesign-regulations-from-1-january-2022-is-an-important-step-on-the-path-to-banning-wood-burning/>

³² <https://members.parliament.uk/member/155/writtenquestions>

³³ <https://cleanair.london/health/implementation-of-ecodesign-regulations-from-1-january-2022-is-an-important-step-on-the-path-to-banning-wood-burning/>

³⁴ <https://www.gov.uk/government/statistics/announcements/air-quality-statistics--2>

³⁵ <https://cleanair.london/hot-topics/clean-air-in-london-exposes-cosy-world-of-the-wood-stove-industry/>

³⁶ <https://ico.org.uk/media/action-weve-taken/decision-notices/2023/4024909/ic-164990-h817.pdf>

<https://cleanair.london/health/ban-domestic-wood-burning-in-urban-areas/>

<https://cleanair.london/health/implementation-of-ecodesign-regulations-from-1-january-2022-is-an-important-step-on-the-path-to-banning-wood-burning/>

<https://cleanair.london/hot-topics/clean-air-in-london-exposes-cosy-world-of-the-wood-stove-industry/>

Building emissions including new powers needed by Metro Mayors and local authorities (LAQM)

44. Industrial emissions: Please close the lacuna that exists for small CHP units (under 20MW). See attached information relating to CAL's complaint to the European Commission in 2019.
45. Please see CAL's letter dated 14 February 2023 (attached) which explains and makes recommendations for the powers needed by local authorities to tackle air pollution. This covers matters such as non-road mobile machinery.
46. Defra should make it easier not harder for public authorities to control industrial emissions of all sorts and require zero or ultra low emission measures including for non-road mobile machinery.

Agriculture and ammonia (NH₃)

47. Please provide line of sight between emissions from agriculture, particularly ammonia (NH₃), and secondary PM_{2.5} concentrations. Evidence shows that UK agriculture accounted for 25% of PM_{2.5} concentrations in London in 2019³⁷. Defra has made no progress in reducing these emissions for a decade and looks set to breach the national emission ceiling in the current and future years to 2030³⁸.
48. Defra needs to undertake much more ambitious action to protect health, the environment and the climate from agricultural emissions e.g. NH₃ and methane (CH₄). Also oxides of nitrogen (NO_x).
49. Defra has spent many years pointing its finger at other government departments, such as the Department of Transport over breaches of nitrogen dioxide, while taking little or no action in policy areas where it has primary responsibility e.g. wood burning and ammonia.
50. Annex III (Part 2) (pages 22-24) of 'Directive 2016/2284 on the reduction of national emissions of certain atmospheric pollutants' listed many good practices which should be adopted to control ammonia emissions. Defra should implement them all.

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016L2284&from=EN>

Indoor air

51. Please see CAL's letter dated 14 February 2023 (attached) which explains what needs to be done to improve indoor air and how.
52. CAL is pleased to see that Defra has referred to the need for action on damp and mould. This should be led by DLUHC not Defra. Why has Defra not mentioned the CMO's annual report?
53. Please understand that opening windows for 'ventilation' will result in higher energy costs in (cold) winters and (warm) summers. The outcomes to be prioritised are 'clean air' and 'low energy costs'.

³⁷ <https://www.theguardian.com/environment/2023/mar/24/uk-farming-causes-over-quarter-cities-particle-pollution-study>

³⁸ <https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-ammonia-nh3>

54. CAL considers that DLUHC (and DHSC) should lead generally on the new government guidance on indoor air, not Defra.

Need and opportunity to match and exceed the ambition level in the European Union's review Air Quality Directives and the CLRTAP

55. Defra needs to demonstrate that it has considered the analysis, evidence and facts from the work being undertaken for the review of the Gothenburg Protocol which shows that 'only' 8,197 people in the UK are expected to be exposed to more than $7 \mu\text{g}/\text{m}^3$ of annual mean concentrations of $\text{PM}_{2.5}$ by 2030 as a **baseline case** i.e. after including many actions already planned or required by legislation. None are expected to be exposed to more than $8 \mu\text{g}/\text{m}^3$ (see attached spreadsheet). A map summarising the results of this modelling was shown in the European Commission's press release with its proposals for the revision of the ambient air quality directives on 26 October 2022:

https://cleanair.london/app/uploads/A_Press-release_European_Green_Deal_Commission_proposes_rules_for_cleaner_air_and_water.pdf

56. Relevant reports and supporting evidence can be seen under the section titled 'Evidence on policies' on this webpage (shown as section 11 on 19 April 2023)³⁹. CAL points Defra particularly to the European Commission's working documents and analysis to support the proposed revision of the ambient air quality directives and the EMEP, GAINS and IIASA modelling some of which relates to the revision of the Gothenburg Protocol. The baseline cases show what can and should be being done by Defra.

https://cleanair.london/app/uploads/EMEP_Status_Report_1_2022_Reduced-file-size.pdf

<https://op.europa.eu/en/publication-detail/-/publication/a05c2e91-54db-11ed-92ed-01aa75ed71a1/language-en>

<https://op.europa.eu/en/publication-detail/-/publication/e23c5923-54db-11ed-92ed-01aa75ed71a1/language-en/format-PDF/source-search>

https://climate.ec.europa.eu/eu-action/climate-strategies-targets/economic-analysis/modelling-tools-eu-analysis_en#GAINS

57. Please demonstrate that you have considered and addressed fully the above including shipping, aviation and other sources of primary and secondary air pollutants.

Communicating air quality information

58. Please show that Defra is sincere about wanting to warn the public about air pollution. For example:
- Who would look for or find a website called <https://uk-air.defra.gov.uk/>?
 - The website hasn't shown the helpful four (or five) day air quality forecast on the homepage for many years <https://twitter.com/cleanairlondon/status/1648750897739051009>
 - The last time Defra sent a 'media release' to environmental editors of media outlets or weather desks warning them about an air pollution episode was 20/21 April 2011. Since

³⁹ <https://cleanair.london/ellaslaw/>

then, Defra has published ‘Information bulletins’ on an obscure webpage when legally required to do so e.g. when ozone exceeds an ‘Information threshold’ under Directive 2008/50/EC or the Air Quality Standards Regulations.

<https://uk-air.defra.gov.uk/news?view=149>

<https://uk-air.defra.gov.uk/news>

- d. CAL has found Defra reluctant to warn the public and published evidence to support this belief:

https://cleanair.london/app/uploads/CAL-398-Ella-Roberta_Warning-the-public-about-air-pollution-episodes_210421.pdf

- e. Good luck to anyone trying to find this important summary from Defra’s homepage:

<https://uk-air.defra.gov.uk/latest/measurement-summary-map>

- f. There is no unique weblink for the ‘Latest measured air quality map’ on the homepage of the UK Air website:

<https://uk-air.defra.gov.uk/>

59. CAL would like to see Defra’s responsibilities for warning the public about air pollution episodes taken over by the DHSC.

Next steps

60. CAL would like to see Defra’s main responsibilities taken over by a new Department of Environment with Defra’s role narrowly limited to farming, food and rural affairs.

Freedom of Information request

Defra told CAL by email on 14 April 2023 that “We have conducted extensive engagement with stakeholders, including local authorities, while developing the draft Strategy prior to the consultation, which we reflected in the draft Strategy”. CAL wishes to understand who was consulted and when during that “extensive engagement” and what written information is held by Defra relating to that engagement since the publication of the Clean Air Strategy on 14 January 2019 e.g. emails requesting or receiving comments on the draft Strategy and reports or papers summarising the responses. Please treat this as a Freedom of Information request.

Reconsult

Please confirm that Defra will reconsult on this proposed decision.

CAL will complain to Defra’s consultation co-ordinator about this consultation and forward a copy of this letter to the Office for Environmental Protection (and separately to the chairs of several select committees and Geraint Davies MP as chair of the APPG on air pollution (without attachments)).



CAL has barely been able to touch the surface of the inadequacies of the proposed AQS and its omissions in the time available.

Yours sincerely

Simon Birkett
Founder and Director

Ps please accept CAL's apologies for typos, errors, omissions and unnumbered appendices in its submission which are due to the inadequate timetable

Enclosures