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Dear Ian

Health and Environment Committee air quality work programme

Clean Air in London (CAL) congratulates the Health and Environment Committee (Committee) on the publication of 'Air pollution in London - Issues paper'. The paper provides a clear, concise summary of current air pollution issues in London.

CAL is writing now with suggestions for further air pollution work to be done by the Committee, as requested in the 'Issues paper'. CAL has identified eight key areas where the Committee could make a powerful impact on the understanding of air pollution in London and action to reduce it.

1. What position is London taking during the 2013 'Year of Air' negotiations?

The outcomes from Europe's 'Year of Air' in 2013 will be critical for air pollution in London and the UK for the next decade and beyond. CAL strongly believes that the 'Year of Air' must deliver continuity with existing obligations and the further tightening of health and legal protections.

Cities and Member States can take two approaches if they are struggling to meet air quality objectives. They can implement a package of bold measures to meet air quality standards or lobby to weaken the effect of the standards. Unfortunately, CAL believes the Mayor is using London's significant weight and lobbying power to take the latter approach during the 2013 negotiations. Needless to say, such an approach undermines the health protections provided by UK and European air quality laws for London's residents, visitors and workers. The Mayor should be driving down harmful emissions and building public understanding of air pollution not undermining one of the bedrocks of public health legislation.

Scrutiny by the Committee could assess the Mayor's current negotiating and recommend steps that should be taken to protect Londoners and others. Relevant questions in your issues document here are '*Should the Committee support the city-regions' position in lobbying the EC?*' and '*Does the issue of transboundary pollution make a difference to the steps London should take to reduce its emissions?*' (both on page 16). As you know, the Mayor is refusing to release key information to CAL and others about his communications with other cities and regions.

UK and European air quality standards and legal limits have been set to ensure that all European citizens enjoy a universal minimum standard of air quality. Special pleading by large cities undermines this minimum level of protection (for everyone): people should have the right to live or visit large cities without air pollution causing serious damage to their health.

Transboundary air pollution further demonstrates why air quality objectives must apply equally everywhere. Cities such as London are huge sources of air pollutants; if air quality standards are relaxed for large cities it makes it more difficult for nearby towns and cities to meet their own air quality objectives. ‘Imported’ air pollution should be noted in London’s air quality strategies, but the city should also recognise its status as a major air pollution ‘exporter’ at both the UK and European scale.

CAL understands that ‘Partnership agreements’ have been suggested as a way to ‘finesse’ current and future breaches of nitrogen dioxide (NO₂) laws. CAL urges the Committee to consider whether such agreements are appropriate in any circumstances and, if they are, when and how might they be used?

2. What action must be taken to protect the public from diesel exhaust?

CAL gave oral evidence to the Committee last year highlighting the latest advice from the World Health Organisation that diesel exhaust is carcinogenic for humans. We need to know how much diesel exhaust is emitted in what areas of London, how it can be reduced, who is exposed and how can people be protected?

Are nanoparticles used to reduce diesel fuel consumption and does this matter? Why are diesel particulate filters being removed from vehicles and engine control units disconnected and are such vehicles no longer roadworthy and/or insurable?

As you may know, the Mayor has resisted some CAL efforts to obtain detailed information about the quantity of current diesel exhaust emissions in London.

3. How high are levels of air pollution in the London Underground and does it matter?

There is little public information about levels of air pollution in the London Underground or its possible health effects.

In MQT answers, the Mayor has said:

- MQT 3330/2011, 16 November 2011

“As the figures below show, the levels of tunnel dust remain stable compared with those last reported in my answer to question 2546/2011. All readings are less than one third of the Health and Safety Executive limit for general dust, and exposure remains safe for both staff and customers.

Year	Dust level in milligrams per metre cubed (mg/m ³)
2009/10	0.030 to 1.270
2010/11	0.030 to 1.230

“Dust levels vary by location which is why a range is given.”

- MQT 0282/2012, 25 January 2012

“[London Underground] regularly monitors levels of dust on the Tube within two parameters: air quality experienced by train staff and by station staff. Measurements show that these levels are consistently below the guidance levels recommended by HSE, Institute of Occupational Medicine and the Trade Union Congress.”

In CAL’s opinion, the above statements from the Mayor raise several questions including:

- Why is the Mayor making (and/or relying on?) comparisons between static levels and WELs? As CAL understands it, the monitoring done for Transport for London (TfL) is for static levels of dust which cannot be compared directly with the HSE’s Workplace Exposure Levels (WELs) or the WELs suggested by the Institute of Occupational Medicine. These levels are expressed over a specified period of time (usually eight hours). Has any testing been done across the Tube network over an eight hour or other time period and if so what?
- Why did the Mayor not mention monitored levels around those suggested by IOM and the TUC?:
 - the HSE updated its guidance on Workplace Exposure (WEL) limits (EH40/2005 Workplace Exposure limits) on 19 December 2011 for respirable dust and inhalable dust to 4 mg/m³ and 10 mg/m³ respectively;
 - the IOM “[suggested] that, until safe limits are put in place, employers should aim to keep exposure to respirable dust below 1 mg/m³ and inhalable dust below 5 mg/m³” (IOM, 5 May 2011); and
 - “Because of the serious health risks that exposure to dust can cause the TUC believes that unions and union health and safety representatives should try to ensure that employers follow a precautionary standard of 2.5 mg/m³ for inhalable dust (as opposed to the current 10 mg/m³ standard) and 1 mg/m³ for respirable dust (as opposed to the current 4 mg/m³ standard) for all general dust and dusts where there is not a lower [Workplace Exposure Limits].” (TUC, 1 September 2011)

In other words, the suggestions from IOM and the TUC for respirable dust are one-quarter not one-third of the level recommended by the HSE i.e. illustratively 1.000 mg/m³ compared to 1.230 mg/m³ recorded in static levels.

- Was the Mayor correct to give an absolute assurance that ‘exposure remains safe’ when it is around or near some guideline levels in some locations?

As CAL understands it, scientists have found no safe level for exposure to airborne particulate matter. Indeed, CAL’s understanding is that exposure to ‘dust’ can adversely affect health and it is important to keep dust concentrations as low as possible. In CAL’s opinion, it is wrong therefore for the Mayor to say or imply that such pollution is ‘safe’ when it is around some guideline levels in some locations: it is a bit like saying it’s safe to drive at the speed limit (in some countries).

CAL would like to see this subject investigated by the Committee with a view to establishing *inter alia*: actual levels of air pollution in the London Underground and trends; a range of expert opinions on possible health impacts from exposure to it; and whether and if so what warnings might be issued

to the most vulnerable people. The Committee might also investigate plans to introduce the 'Tunnel Cleaning Train' later this year.

4. How will London meet air quality requirements for PM_{2.5}; PM₁₀ and NO₂?

CAL supports the suggestion that *'The Committee could investigate what further measures may be needed to meet PM_{2.5} limits.'* (page 15). This work could build upon the recently published Air Quality Experts Group report 'PM_{2.5} in the UK' ^{Note 1} and the forthcoming recommendations from the World Health Organisation that CAL understands will be published on 30 January 2013.

CAL suggests that a scrutiny report by the Committee could cover:

- how PM_{2.5} is monitored in London, and whether Defra is meeting the monitoring requirements of the EU Air Quality Directive;
- the legal requirements of the PM_{2.5} objectives for both the Mayor and the UK Government;
- trends in PM_{2.5} concentrations; and
- additional measures needed in order to meet the PM_{2.5} objectives

Similar investigations are needed for PM₁₀ and NO₂. Please also investigate the levels of PM₁₀ around waste and construction sites in London and action needed to reduce them e.g. Neasden Lane in Brent.

5. How can Londoners be empowered to make choices about their own exposure to air pollution?

CAL supports the suggestion that *'The Committee could review how Londoners can be empowered to make choices about their own exposure to air pollution.'* (page 17). Such a review should focus on the effective use of 'smog alerts' and the advice people should be given to help them reduce their exposure to polluted air. As far as CAL is aware, the only smog alert systems for Londoners are the London Air Quality Network and the opt-in airTEXT system.

CAL believes that the Mayor should be doing much more to ensure that warnings of pollution episodes are widely and actively communicated, for example through TV, local newspapers, weather websites and social media. When air pollution is 'Moderate' or above vulnerable people should be warned and when it is 'High' or 'Very high' the general populace should be warned. As CAL understands it, the (otherwise) excellent Met Office and BBC air pollution forecasts do not address urban roadside air pollution i.e. they forecast 'background' levels of pollution.

As you know, the Government has not issued a press release warning of smog since April 2011 when it made headline news. The Mayor refuses to issue such warnings saying it is for the Government despite his own estimates showing there have been many hundreds of additional hospital admissions during smog episodes in the last five years alone (MQT 4295/2012, 19 December 2012).

Are people forgetting that one of the biggest issues needing to be addressed is traffic-related air pollution? What action is being taken to protect school children? How is the CityAir programme being rolled out within London?

The Committee should also investigate the steps being taken by the Mayor to ensure the widespread and robust monitoring and reporting of air pollution data.

6. How can public health authorities be persuaded (and supported) to play a leading role in tackling air pollution?

CAL supports the suggestion that *'The Committee could investigate what support public health authorities need, to play a leading role in tackling air pollution'* (page 18), however the topic needs to be expanded to investigate how public health authorities can be persuaded to adopt the issue of air quality in their assessments and strategies. CAL has been monitoring (and responding to) draft public health strategies in London as they emerge, and so far is aware of only one (the City of London) who has assessed air quality in its Joint Strategic Needs Assessment and prioritised it in its Health and Wellbeing Strategy. Air pollution should also be prioritised by the Mayor's overarching London Health Improvement Board.

CAL understands that the Department of Health is due to publish additional statistics on local air pollution health impacts during early 2013, which will include the number of attributable deaths and years of life lost for each local authority in England. A Committee investigation could spotlight these statistics, and also help to clarify some of the inaccurate comparisons often made on relative health impacts. For example, the health impacts of air pollution are often compared to cancer deaths, but air pollution is a cause of disease whilst cancer is an outcome. We need clarity on 'exposures' and 'outcomes' and the impact of non-communicable diseases generally which a Committee report could bring.

7. How can indoor air quality in London be improved?

We spend the majority of our time inside of buildings, and most of our exposure to polluted air comes when we are indoors. Whilst there is a relationship between indoor and outdoor air quality, indoor air quality is also influenced by building design and the presence of mechanical ventilation/ filtration systems. Very little attention has been paid to date on indoor air quality in London, and research by CAL^{Note3} has revealed that public bodies have a poor understanding of the air filtration systems fitted to their buildings. A Committee report would help to move indoor air quality up the agenda to achieve significant health improvements and energy savings.

8. How can the Mayor's air quality and climate change objectives be aligned and co-managed?

The Mayor's air quality and climate change strategies are distinct, and considerations around co-benefits and trade-offs seem only to be made when the two strategies come into conflict. The Committee could investigate how both sets of objectives can be achieved in a way that maximises co-benefits and minimises trade-offs i.e. prioritising technologies with both air quality and climate change benefits and carefully managing the deployment of low carbon technologies with negative air quality impacts.

Priority issues include:

- Combined Heat and Power (CHP). The Mayor plans to increase hugely the use of gas fired CHP in London. However, modelling suggests this could have very significant negative air quality impacts in central London. More work is needed to understand the technologies used, whether they should be deployed in large cities at all and how adverse air quality impacts could be minimised;

- biomass burning in London homes and buildings. Currently, the Mayor seems to be actively encouraging biomass when its use should be discouraged and/or banned. Festival bonfires are also an increasing concern; and
- the use of standby diesel generators. Many buildings in London contain backup diesel generators to ensure electricity supply is maintained in the event of a power cut. Building operators are now being (financially) encouraged to run these generators to provide electricity to the grid in times of high demand ^{Note 2}. These generators are likely to have high air pollutant emissions. In CAL's view, their use should be actively discouraged.

It seems the Mayor's climate, energy, health and environmental policies are not 'joined up' and may be in active conflict with one another.

I hope these suggestions are useful for planning the Committee's future work on air quality. CAL would be pleased to give further oral or written evidence to the Committee.

Please contact me if you wish to discuss these suggestions or any other air pollution issues.

With best wishes.

Yours sincerely

Simon Birkett
Founder and Director

Notes

1. <http://www.defra.gov.uk/publications/files/pb13837-aqeg-fine-particle-matter-20121220.pdf>
2. <http://www.flexitricity.com/>
3. <http://cleanairinlondon.org/indoor-air-quality/few-local-authorities-know-if-their-schools-use-air-filters-that-protect-children/>