



UK Health Forum response to the DEFRA Consultation on additional measures to support individuals and businesses affected by local NO₂ plans

Date: 5th January 2018

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About the UK Health Forum

The UK Health Forum (UKHF), a registered charity, is both a UK forum and an international centre for the prevention of non-communicable diseases (NCDs) including coronary heart disease, stroke, cancer, diabetes, chronic kidney disease and dementia through a focus on up-stream measures targeted at the four shared modifiable risk factors of poor nutrition, physical inactivity, tobacco use and alcohol misuse. UKHF undertakes policy research and advocacy to support action by government, the public sector and commercial operators. As an alliance, the UKHF is uniquely placed to develop and promote consensus-based healthy public policy and to coordinate public health advocacy.

Summary recommendations

The UKHF welcomes the opportunity to respond to the DEFRA consultation on additional measures to support individuals and businesses affected by local NO₂ plans. These are key recommendations:

- The government should introduce a levy on motor manufacturers to pay for a clean air fund following the polluter pays principle. This levy should be mandatory and apply to all motor manufacturers in order to create a level playing field. In Germany, a government-run clean air fund aims to support shifts in current transport use to cleaner modes such as zero emission buses (public transport), car clubs, walking and cycling. German motor manufacturers pledged around one quarter of a billion euros towards the fund. However, the schemes voluntary (not mandatory) nature and absence of a level playing field have led to challenges in securing the pledged funds^{1,2};
- The government should introduce a targeted scrappage scheme based on need, to help people on lower incomes and small business owners, who bought diesel vehicles in good faith. The scheme should include help for people to move to more active travel and cleaner alternatives, such as subsidised public transport season tickets and workplace bicycle schemes;
- The government should invest in improvements in infrastructure to encourage the uptake of active travel. This should include better cycling routes and improved walkability in local areas. Better public transport systems will be required in addition to improved bus access for those most affected by areas of high pollution;
- Motor vehicle manufacturers should be required to recall the most polluting diesel vehicles to have them retrofitted with pollution reducing hardware. This has happened in other countries such as Germany³ and can also be introduced in the UK.

Introduction

The cost of air pollution to the UK economy in 2010 was estimated by the World Health Organization to be \$83 billion (c.£54 billion). This accounts for 3.7% of GDP in Britain, where 29,000 people each year are estimated to die prematurely from air pollution⁴. Diesel vehicles are a major source of illegal and harmful levels of pollution in our towns, cities and across the country; pollution that can trigger heart and asthma

¹ <https://www.ft.com/content/04587322-7758-11e7-90c0-90a9d1bc9691>

² <https://uk.reuters.com/article/us-germany-emissions/germany-clears-1-19-billion-in-diesel-pollution-funds-for-cities-idUKKBN1DS1HJ>

³ <https://www.cnn.com/2017/08/02/german-carmakers-agree-to-update-software-of-5-million-diesel-cars.html>

⁴ <https://www.airqualitynews.com/2015/04/28/air-pollution-costs-uk-economy-54-billion-a-year/>

attacks, increase the risk of lung cancer and increase the risk of hospital admission and mortality⁵. Air pollution exposure may also affect mental and physical development in children and thinking skills (cognition) in older people.

Car manufacturers have failed to control emissions of nitrous oxides (NO_x). Even the newest diesel cars are not as clean as they should be. Recent analysis has shown that only 10% of the newest cars meet the official emission limits on the road, while the rest emit up to 12 times over the limit. The most polluting diesel cars emit more pollution than a modern diesel lorry⁶. Car manufacturers have lobbied against effective pollution controls and taken advantage of weak regulations to produce cars which pass laboratory tests but emit higher amounts of pollution on the road.

The polluter pays principle, states that “the polluter should bear the expense of carrying out the measures decided by public authorities to ensure that the environment is in an acceptable state”⁷. Applying this principle to car manufacturers, in the form of a levy, would help to ease the burden of such costs on the taxpayer. These funds could be used to support the additional measures mentioned in the DEFRA Air quality plan for nitrogen dioxide (2017)⁸. This would also enable vital funds to be freed up to support an over stretched National Health Service (NHS); funds that could provide care for those most affected by air pollution.

This is the Government’s opportunity to help remove diesel cars from roads across the country and to represent drivers who bought diesel cars in good faith, in order to put the UK on the path to a cleaner and healthier future.

We have drawn on the National Institute for Health and Care Excellence (NICE) guidance on air pollution in our recommendations, as a trusted source to inform evidence based strategies to reduce the health impacts of air pollution⁹.

Response to questions:

2) & 3) Please provide evidence on what else could be done to support people to upgrade or retrofit their vehicles in line with the assessment criteria. What can government and industry do to support local authorities to encourage the uptake of ultra low emission vehicles?

We support the proposed actions in the consultation document to enable individuals and businesses to make the switch to low emission vehicles. We highlight the actions we particularly agree with below, as some of these are evidence-based and recommended by NICE⁹:

- Local authorities should consider making low vehicle emissions (NO_x and particulates) one of the criteria when making routine procurement decisions. This could include selecting low-emission vehicles, for example electric vehicles
- Manufacturers should be required to recall the most polluting diesel vehicles to have them retrofitted with pollution reducing hardware

⁵ <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

⁶ https://www.theicct.org/sites/default/files/publications/ICCT_RoadTested_201709.pdf

⁷ http://ec.europa.eu/environment/legal/law/pdf/principles/2%20Polluter%20Pays%20Principle_revised.pdf

⁸ <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

⁹ <https://www.nice.org.uk/guidance/ng70>

These measures would meet the key assessment criteria: they represent value for money for the taxpayer as they would provide co-benefits for other national priorities such as climate change and the reduction of non-communicable diseases; they would have a minimal negative impact on air quality or other pollutant levels; and they are credible, deliverable and timely.

4) Please provide evidence on how the measures to support individuals to switch to other forms of transport could be designed to meet the assessment criteria.

We would strongly support the following recommendations from the NICE guidance⁹ on air pollution to support individuals to switch to other forms of transport:

- We would welcome the use of strategic planning processes and the development of infrastructure to prioritise active (cycling and walking) travel
- We support the development of integrated public transport networks (including park and ride schemes) based on low-emission vehicles

These measures would meet the following assessment criteria: they would represent value for money for the taxpayer and would also provide co-benefits by supporting other national priorities such as climate change and the reduction of non-communicable diseases; they would have a minimal negative impact on air quality or other pollutant levels; and they are credible, deliverable and timely.

6) Please provide evidence on whether a targeted scrappage scheme could be designed to meet the assessment criteria.

The introduction of a targeted scrappage scheme by the government would help people on lower incomes and small business owners, who bought diesel vehicles in good faith. The scheme should be designed to help and support them to switch to cleaner alternatives, such as subsidised public transport season tickets and workplace bicycle schemes.

The scrappage scheme would meet the following assessment criteria: it would represent value for money for the taxpayer and would also provide co-benefits by supporting other national priorities such as climate change and the reduction of non-communicable diseases; it would have minimal negative impact on air quality or other pollutant levels; and it would not create any delays to the implementation of the government's NO₂ Plan.