



**Institute for Air Quality
Management**

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Clerk of the Committee
Environmental Audit Committee
House of Commons
7 Millbank, London SW1P 3JA

Dear Sir

Air Quality Inquiry

(1) The Institute of Air Quality Management (<http://www.iaqm.co.uk/index.html>) is the UK's professional body for those working in the field of air quality management. The Institute of Air Quality Management (IAQM) seeks to maintain, enhance and promote the highest standards of working practices in the field of air quality and for the professional development of those who undertake this work.

(2) The IAQM does not develop policy, but it generally commends the approach put forward to the Audit Committee by Environmental Protection UK.

(3) The Environmental Audit Committee has requested responses in each of four areas. The IAQM have summarised in a few words its view of current understanding in these areas.

Question The causes of particulate and NO₂ air pollution in the UK and how these can be reduced most effectively.

Answer It is not easy to reduce these pollutants as technical measures have mostly delivered what they can.

Question The impacts on health and the environment from particulate and NO₂ pollution, and how these should be measured.

Answer The impacts are thought to be large, so that the broad solution is clear. The precise linkages are subject to considerable uncertainty, making decisions as to what is the most appropriate action in local situations difficult.

Question The effectiveness of the Government's strategy for improving particulate and NO₂ air quality, and how that might be improved.

Answer It is unclear what the strategy is, but it appears to be based mainly on non-technical local action. Local action in the community is to be encouraged by ensuring that there is sufficient local support.

Question The potential effects of the Government's localism agenda and proposed reforms of public health provision on local authorities' capacity for tackling poor air quality.

Answer These are mechanisms for increasing support for local non-technical measures which may be unpopular with some sections of the local community. In theory, the proposed public health measures present an opportunity for addressing air quality issues in a unified manner with a firm focus on achieving health benefits, rather than 'ticking a box' to confirm that certain processes have been carried out. The IAQM has serious reservations about the possible impacts of localism given some of the measures proposed in recent months. In particular the proposed redrafting of Planning Policy Statements by DCLG and the forthcoming third round of Local Transport Plans appear to relegate air quality to a minor issue which can largely be ignored. Localism could accentuate the use of the motor vehicle and road transport in the short term, especially in south east England.

(4) If there is broad consensus on the above, then the serious issue facing the air quality management profession is that the right local measures on improving air quality, although highly desirable, may be difficult to determine. The UK Government needs to ensure that the quality of the evidence which supports local action is good enough and can deliver better air quality. The IAQM have grave concerns that the evidence may not be good enough, resulting in local criticism, loss of credibility, and repercussions from Europe over whether European legislation is being implemented properly.

(5) The UK Government should adopt a leadership role to ensure that the latest knowledge and science is incorporated into the local air quality management system. There is a need for continual update and review of current science and understanding.

(6) The role of Europe in UK environmental policy is now dominant. The EU Air Quality Directive will be revised in 2013. Examples of relevant questions for UK action are:

- Does the effort on particulate matter and NO₂ fairly reflect the degree concern over these pollutants?
- Should more attention be paid to ammonia if the country is concerned with critical loads, either to address acidification or an excess of nutrients?

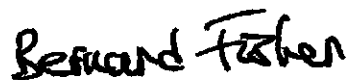
(7) There is a lack of guidance on implementing EU Directives. The FAIRMODE (Forum for Air Quality Modelling in Europe) and AQMEII (Air Quality Modelling Evaluation International Initiative) programmes are making international comparisons of air quality practice, but will their deliberations and Commission staff papers be consistent with UK expert opinion, and fairly reflect uncertainties? In contrast, in the UK detailed advice has been available on how local air quality management legislation should be carried out, following much consultation.

(8) There needs to be effective leadership within Government to ensure that local air quality management, in operation, is subject to the highest standards. The IAQM is not confident that the present departmental system, which has a tendency to adopt a silo mentality and short-term thinking, is able to tackle the broad and undoubtedly difficult policy measures relating to further improvement in air quality. It must also engage fully in

discussions with Europe to ensure that UK experience and practice is taken into account when European requirements are drafted.

(9) At the present time the reduction in resources available to local air quality management as the budget deficit is addressed should not be ignored. Reductions in experienced professional staff, in the monitoring of air quality and in the scope of assessment activities are to be expected. Thus the need to address the national leadership role is even more important, in order that the resources and priorities assigned to air quality management are balanced correctly in the overall national interest.

Yours sincerely

A handwritten signature in black ink that reads "Bernard Fisher". The signature is written in a cursive style with a large initial 'B'.

Prof Bernard Fisher
Chairman IAQM
On behalf of the Institute for Air Quality Management