Dear Sir/Madam

Consultation on the Clean Air Strategy

The British Medical Association (BMA) is a voluntary professional association and independent trade union, representing doctors and medical students from all branches of medicine across the UK and supporting them to deliver the highest standards of patient care. Doctors are concerned about levels of air pollution, and the significant threat this poses to their patients’ and wider public health. Air pollution can damage health in numerous ways; it is linked to chronic respiratory diseases, diabetes, obesity, cancer and dementia. It is estimated to be attributed to 40,000 deaths a year and impacts some of the most vulnerable in society. The Association therefore welcomes the opportunity to respond to the Clean Air Strategy 2018; and is also a member of the UK Health Alliance for Climate Change (UKHACC), who are providing a more detailed response. Our responses to some of the specific areas covered by the strategy are detailed below.

Understanding the problem
We support increased investment into improving modelling, data and analytical tools, to better monitor air pollution (as outlined in section 1.5). We would like there to be more testing and tracking of car emissions and harmful pollutants in major urban areas specifically, particularly around schools (including playgrounds) and hospitals. This will better inform the effectiveness of interventions to tackle air pollution in these areas.

Protecting the nation’s health
We support the provision of clear and transparent information about air pollution as outlined in section 2.5; which is particularly important to those who are more vulnerable to the impacts of air pollution such as children, the elderly and those with chronic health problems. We support making this data more transparent to the public and policymakers, by bringing it together into a single accessible portal. It is
important that there is a specific commitment to publishing new data on a regular basis (for example quarterly), to allow rapid identification of emerging trends.

**Action to reduce emissions from transport**

We welcome the actions to reduce air pollution associated with vehicles, in the 2017 [UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations](https://www.gov.uk/government/publications/uk-plan-for-tackling-roadside-nitrogen-dioxide-concentrations) and [Clean Growth Strategy](https://www.gov.uk/government/publications/clean-growth-strategy). We would like the actions of the [Road to Zero](https://www.gov.uk/government/collections/road-to-zero) to go further, by bringing forward the planned end sale of petrol and diesel vehicles, from 2040, to 2030. In the meantime, vehicle taxation should be implemented to rapidly discourage the use of diesel and petrol vehicles. This should be supplemented by providing clearer information for consumers on emissions produced by new vehicles (such as ultrafine particulates and oxides of nitrogen). We would also like to see increased funding for the charging infrastructure deployment – as we do not believe that £80 million is sufficient to significantly boost this infrastructure required to meet the 2040 (or 2030) goal. We would also like to see increased funding dedicated to offering financial assistance for people to switch to hybrid and electric vehicles.

As outlined in section 5.7.2, we welcome the commitment to encouraging more active modes of transport such as cycling and walking. Along with investment in new cycle lanes, there needs to be increased investment into providing safe areas for walking. Promoting active travel will not only help reduce levels of air pollution, but is also an opportunity to improve the population’s health. As highlighted in the BMA’s report [Healthy Transport = Healthy Lives](https://www.bma.org.uk/news-and-resources/publications/healthy-transport-healthy-lives), being physically active, through active travel, is a major component of weight control, reducing the risk of premature death by up to 30%. This would be highly beneficial for the population, as in 2015/16, 26% of adults were classified as being inactive (fewer than 30 minutes of physical activity a week), as well as being obese. Being obese can increase the risk of conditions such as type 2 diabetes, heart disease, stroke and some types of cancer. Promoting active travel could also therefore reduce the huge cost of obesity to society (estimated £27 billion in 2014/15) and health system (estimated £6.1 billion).

**Leadership at all levels**

We support empowering local authorities to expand ultra-low emission zones, which could significantly reduce local levels of air pollution. More generally, local authorities could potentially play a strong health leadership role in the reduction of air pollution, but to do so they must be fully resourced. The 2018 BMA briefing [Feeling the squeeze – the local impact of cuts to public health budgets in England](https://www.bma.org.uk/media/529168/briefing0818.pdf) highlighted that funding to deliver public health services across England has significantly reduced over recent years, and planned cuts average 3.9% a year to 2020/21. This reduction in funding will significantly undermine any efforts to having a joined-up approach to tackling air pollution locally.
Securing clean growth and driving innovation

We welcome the confirmation of the Government’s intention to phase out coal in section 4.5 and in the 2017 Clean Growth Strategy (by 2025); and we would like this to be enshrined in law. This must be coupled with a transition to cleaner, renewable energy. We also support the creation of more energy-efficient infrastructure; for which there needs to be significant investment.

To drive innovation in the air pollution and climate change agenda, we would like to see increased funding for research into the economic and health impacts of air pollution over the short and long-term; as well as research on the effectiveness of interventions to tackle air pollution. The Clean Air Strategy must be supported by significant investment overall, to turn these ambitions into reality and address the huge scale of the problem.

We hope that our submission is useful – please do not hesitate to contact us for more information if required.

Yours sincerely

Jenny Priest
Head of Public Health and Healthcare

1 Royal College of Physicians & Royal College of Paediatrics and Child Health (2016) Every breath we take: the lifelong impact of air pollution. Royal College of Physicians & Royal College of Paediatrics and Child Health.
2 BMA (2012) Healthy transport = healthy lives. BMA.
6 BMA (2018) Feeling the squeeze - The local impact of cuts to public health budgets in England. BMA.