19 June 2018

Tackling roadside nitrogen dioxide concentrations in Wales

Dear Sir/Madam,

On behalf of BMA Cymru Wales, I am writing to respond to the Welsh Government consultation on tackling roadside nitrogen dioxide concentrations in Wales. Whilst we do not seek to offer a detailed commentary on the proposals put forward for specific local action, we would nonetheless like to put forward a few observations for the Welsh Government’s consideration.

At UK level, the BMA is a member of the UK Health Alliance on Climate Change. As a member of this alliance, we were co-signatories to a report entitled ‘A Breath of Fresh Air’ published in 2016. The key recommendations of that report were as follows:

1. Increase cross-departmental collaboration to promote a joined-up approach to tackling air pollution and climate change
2. Phase-out coal power stations by 2025
3. Expand existing clean air zones and extend their use to other cities
4. Better monitor air pollution in areas where the most vulnerable populations live
5. Retain or improve air quality standards that the previous EU regulations afforded us
6. Better inform and support health professionals to take local action and provide advice to patients

1 UK Health Alliance on Climate Change (2016) A breath of fresh air. Available at: http://www.ukhealthalliance.org/report-breath-fresh-air/
Further detail regarding our policy position can be found within the document itself, as well as within an earlier report published by the BMA’s Board of Science entitled ‘Healthy transport = healthy lives’. In this earlier report, we expressed support for the use of low emission zones which we noted can be implemented to improve air quality in areas where air pollution has reached levels dangerous to health. We also noted that road charging can influence decisions to drive, and positively benefit health through reducing traffic volume and improving local air quality.

BMA Cymru Wales supports the analysis detailed within the consultation document outlining the adverse impact on public health of roadside pollution, including from nitrogen dioxide, and we very much support the principle that greater action needs to be taken to address this – both by the Welsh Government and by relevant local authorities.

Having canvassed views amongst members, we would like to make a few further points for the Welsh Government’s consideration:

- In considering the roadside pollution that derives from emissions from diesel vehicles, it is worth considering that technological solutions may be being developed, such as by Bosch, that can reduce diesel engine NO₂ output to 10% of current levels. When combined with the use of particulate filters employed on modern diesel cars this may tip the balance back in favour of diesel cars due to their greater level of fuel economy. A priority for the Welsh Government may therefore be to facilitate the removal of older, more polluting diesel vehicles and encourage investment in newer, less-polluting vehicles. This could involve more modern and less polluting diesel vehicles, subject to suitable advances in their production, alongside those with electric and hybrid engines.

- There is a significant need for much greater investment in Wales in the provision of charging points for electric vehicles, including fast charging points. We note that Wales is lagging significantly behind other parts of the UK in this regard. One of our members has noted that there is minimal provision of charging points that could facilitate someone wishing to use an electric vehicle to travel between north and south Wales, and this contrasts with her recent experience of touring Scotland by electric vehicle where she found there were free charging points available at ferry ports. We would therefore suggest that addressing the provision of charging points for electric vehicles should also be part of the Welsh Government’s strategy.

- Whilst we recognise that the references in the consultation document to taking action “within the shortest time possible” are largely driven by the outcome of the judicial review of the 2017 plan, we believe that there is potential for such a timeframe to lack sufficient clarity. We feel it is important that any plan commits to achieving a specific target for improvement in roadside nitrogen dioxide levels within a specified timeframe. Our members also feel it is important we consider the need for action in the longer term as well, in line with the aims of the Well-being of Future Generations (Wales) Act 2015.

Yours sincerely,

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Dr Rodney Berman
Senior Policy Executive

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