



Department
for Environment
Food & Rural Affairs

Air Quality: Consultation on draft National Air Pollution Control Programme

February 2019



Scottish Government
Riaghaltas na h-Alba
gov.scot



Department of
Agriculture, Environment
and Rural Affairs
www.daera-ni.gov.uk



Llywodraeth Cymru
Welsh Government



© Crown copyright 2019

You may re-use this information (excluding logos) free of charge in any format or medium, under the terms of the Open Government Licence v.3. To view this licence visit www.nationalarchives.gov.uk/doc/open-government-licence/version/3/ or email PSI@nationalarchives.gsi.gov.uk

This publication is available at www.gov.uk/government/publications

Any enquiries regarding this publication should be sent to us at:

cleanair.consultations@defra.gsi.gov.uk

www.gov.uk/defra

Contents

1. About this consultation.....	1
Overview	1
2. Context and summary of draft NAPCP	1
Background	1
UK NAPCP	2
3. Aim of this consultation	3
4. Consultation questions.....	3
General information and how to respond	6
At the end of the consultation	7

1. About this consultation

Overview

The UK government and the devolved administrations (DAs) are strongly committed to improving air quality and the associated benefits for public health and the natural environment. Air pollution does not recognise national or international boundaries. Therefore, emissions in one nation can impact on air quality across the rest of the UK. In recognition of this, the UK government and DAs are working collaboratively to understand at a UK level what action is needed to improve air quality and the quality of life for current and future generations

The UK government and the devolved administrations are conducting a focused consultation on the UK's National Air Pollution Control Programme (NAPCP). Under the National Emissions Ceiling Directive and the transposing domestic legislation, The National Emissions Ceiling Regulations (2018), the Secretary of State is required to prepare and publish a UK National Air Pollution Control Programme by 1 April 2019. Current domestic and EU legislation requires the Secretary of State to publish the NAPCP and submit it to the European Commission by 1 April 2019. The legislation also states that the NAPCP must be subject to a public consultation prior to publication.

As air quality is a devolved matter and the devolved administrations have their own independent policies, the UK needs to work collaboratively with each administration to achieve its statutory objectives. The NAPCP is a UK wide document and sets out the proposed measures and technical analysis, which demonstrate how the legally binding 2020 and 2030 emission reduction commitments (ERCs) for 5 damaging pollutants (nitrogen oxides, ammonia, non-methane volatile organic compounds, particulate matter and sulphur dioxide) can be met across the UK.

The consultation will run for 4 weeks, closing on 14th March 2019. The consultation timings are dependent on the publication of our Clean Air Strategy (which happened in January) and meeting the challenging deadline to publish the NAPCP by 1 April 2019.

2. Context and summary of draft NAPCP

Background

Air pollution is the UK's top environmental risk to human health. Exposure to harmful pollutants such as nitrogen dioxide and fine particulate matter can adversely affect health, especially amongst vulnerable population groups. It can reduce life expectancy by increasing mortality and morbidity risks from heart disease and strokes, respiratory diseases, lung cancer and other conditions.

The UK is a Party to the 1979 Convention on Long-Range Transboundary Air Pollution of the United Nations Economic Commission for Europe (UNECE) and the original 1999 Gothenburg Protocol to the Convention which sets national emission ceilings for four air pollutants. The 2012 amendment to the 1999 Gothenburg Protocol was agreed among Parties with a view to further improving the protection of human health and the environment and sets new national ERCs for five air pollutants: nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), sulphur dioxide (SO₂), ammonia (NH₃) and fine particulate matter (PM_{2.5}), to be achieved by 2020 and beyond, and updating emission limit values of air pollutants at source.

A revised National Emission Ceilings (NEC) Directive (2016/2284/EU) entered into force on 31 December 2016 which implements the national ERCs agreed under the amended Gothenburg Protocol. Replacing earlier legislation (Directive 2001/81/EC), the new NEC Directive requires overall reductions in UK anthropogenic emissions of five damaging air pollutants: as compared with levels in 2005. These national ERCs need to be met in two phases, from 2020 to 2029 in line with commitments set by the amended Gothenburg Protocol, with more stringent levels to be met from 2030 onwards with the aim of reducing the health impacts of air pollution by half compared with 2005. It also ensures that the emission ceilings for 2010 set in the earlier directive remain applicable for Member States until the end of 2019.

On 14 January this year the UK government published a Clean Air Strategy (CAS) which outlines the actions to be taken in England (and across the UK where policies are reserved e.g. transports Road to Zero) to meet the ERCs. The Clean Air Strategy included the goal to halve the number of people living in areas exceeding World Health Organization (WHO) guideline limits, going beyond the EU targets. The World Health Organization has praised the Clean Air Strategy as 'an example for the rest of the world to follow'.

The Devolved Administrations have their own ambitious and wide ranging cross-sector policies to reduce emissions and improve air quality, a number of which were set out in the CAS. The Welsh Government will consult on a Clean Air Plan this year which will set out these policies alongside others to improve air quality and associated public health and environmental outcomes across Wales. The Scottish Government will also publish a revised version of the existing Cleaner Air for Scotland strategy later this year. The Department for Agriculture, Environment and Rural Affairs in Northern Ireland is currently preparing an Air Quality Strategy, which it hopes to consult upon later in 2019.

UK NAPCP

The NAPCP is a largely technical document which assesses the emission reduction (abatement) potential of a range of measures to be deployed across the UK. Estimates of the impact of these measures are made for each pollutant in terms of emission reductions. Each UK administration has its own current and planned emission reduction commitments and this has been factored-in when preparing the document and conducting the analysis.

For England, the measures used in the NAPCP analysis are those specified in the CAS (and therefore subject to a full public consultation in May 2018). The Devolved Administrations have outlined their existing and planned policies in the development of the NAPCP. A number of these policies, which have outcomes associated with the measures in the CAS, were described in the CAS. Defra have used the CAS measures to support the preparation of an initial NAPCP, which they will submit on 1st April 2019. Once the full suite of measures in each Devolved Administration has been accounted for fully, the NAPCP will be revised and republished in 2020.

Table 2.8.1 (pg. 58-59) of the NAPCP demonstrates that the UK is able to meet the 2020 and 2030 ERCs if the CAS measures are applied in England only and therefore the DA policies and NAPCP revisions, will only increase compliance and emission reductions.

In line with standard policy, we are submitting the mandatory reporting fields in the NAPCP (i.e., not optional content); these fields are highlighted in blue in the NAPCP document.

3. Aim of this consultation

This consultation seeks views on the draft NAPCP and the use of the estimates of abatement associated with the policy measures and also asks for any additional analysis or evidence that could be used.

The consultation sets out 8 questions, the first of which asks about the estimates of abatement associated with the policy measures. The next 7 questions link specifically to the package of measures linked to specific industries. There is also the opportunity to provide supporting quantitative evidence. The aim of this section is to understand whether there is additional evidence on emission reductions that we can incorporate into the NAPCP.

A further question relates to the development of further measures the UK government or the devolved administrations could incorporate in the future to help to achieve the UK ERC most effectively.

4. Consultation questions

1. Do you agree with the estimates of abatement associated with the policy measures in the NAPCP?

- Agree
- Neutral
- Disagree
- Don't know

If you answered Agree, please go to question 8.

2. Within the package of measures on **road transport** do you have any concerns about the estimates provided on any of the pollutants below?

Please only fill in the pollutant boxes where you have concerns.

Please explain your concerns in terms of the estimates for each pollutant.

Please use the document attachment feature to upload any supporting evidence you have in support of your concerns. However, please ensure that you express your main concerns and the main conclusions from your evidence in the text box.

- Nitrogen oxides (NOx)
- Sulphur dioxide (SO₂)
- Non-methane volatile organic compounds (NMVOCs)
- Fine particulate matter (PM_{2.5})
- Ammonia (NH₃)

3. Within the package of measures on **shipping** do you have any concerns about the estimates provided on any of the pollutants below?

Please only fill in the pollutant boxes where you have concerns.

Please explain your concerns in terms of the estimates for each pollutant.

Please use the document attachment feature to upload any supporting evidence you have in support of your concerns. However, please ensure that you express your main concerns and the main conclusions from your evidence in the text box.

- Nitrogen oxides (NOx)
- Sulphur dioxide (SO₂)
- Non-methane volatile organic compounds (NMVOCs)
- Fine particulate matter (PM_{2.5})
- Ammonia (NH₃)

4. Within the package of measures on **other transport** do you have any concerns about the estimates provided on any of the pollutants below?

Please only fill in the pollutant boxes where you have concerns.

Please explain your concerns in terms of the estimates for each pollutant.

Please use the document attachment feature to upload any supporting evidence you have in support of your concerns. However, please ensure that you express your main concerns and the main conclusions from your evidence in the text box.

- Nitrogen oxides (NOx)
- Sulphur dioxide (SO₂)
- Non-methane volatile organic compounds (NMVOCs)

- Fine particulate matter (PM2.5)
- Ammonia (NH3)

5. Within the package of **domestic** measures do you have any concerns about the estimates provided on any of the pollutants below

Please only fill in the pollutant boxes where you have concerns.

Please explain your concerns in terms of the estimates for each pollutant.

Please use the document attachment feature to upload any supporting evidence you have in support of your concerns. However, please ensure that you express your main concerns and the main conclusions from your evidence in the text box.

- Nitrogen oxides (NOx)
- Sulphur dioxide (SO2)
- Non-methane volatile organic compounds (NMVOCs)
- Fine particulate matter (PM2.5)
- Ammonia (NH3)

6. Within the package of measures on **agriculture** do you have any concerns about the estimates provided on any of the pollutants below?

Please only fill in the pollutant boxes where you have concerns.

Please explain your concerns in terms of the estimates for each pollutant.

Please use the document attachment feature to upload any supporting evidence you have in support of your concerns. However, please ensure that you express your main concerns and the main conclusions from your evidence in the text box.

- Nitrogen oxides (NOx)
- Sulphur dioxide (SO2)
- Non-methane volatile organic compounds (NMVOCs)
- Fine particulate matter (PM2.5)
- Ammonia (NH3)

7. Within the package of measures on **industry** do you have any concerns about the estimates provided on any of the pollutants below?

Please only fill in the pollutant boxes where you have concerns.

Please explain your concerns in terms of the estimates for each pollutant.

Please use the document attachment feature to upload any supporting evidence you have in support of your concerns. However, please ensure that you express your main concerns and the main conclusions from your evidence in the text box.

- Nitrogen oxides (NOx)
- Sulphur dioxide (SO2)
- Non-methane volatile organic compounds (NMVOCs)
- Fine particulate matter (PM2.5)
- Ammonia (NH3)

8. After the publication of this initial NAPCP, UK government and devolved administrations will continue to develop our policy measures and approach. This will be reflected in future iterations of the NAPCP which will be published in due course. Please inform us of any further measures you think the UK government and devolved administrations should take into account to help to achieve the UK ERCs most effectively. Proposals should be evidence based, indicating likely costs and benefits. Please select a country from the list below and use the text box and file upload button to leave your feedback.

- England
- Northern Ireland
- Scotland
- Wales

Add text here.

General information and how to respond

Response due date: This consultation will close at 11.59pm on 14 March 2019.

How to respond: Please respond via citizen space – the consultation is accessible at the following link: <https://consult.defra.gov.uk/environmental-quality/napcp-consultation/>

You may also respond by post to:

Draft NAPCP consultation
Air Quality Team
Department for Environment, Food & Rural Affairs,
Seacole Building
2 Marsham Street, London
SW1P 4DF

If you would like to respond by email, please contact us first and we will send a response template for completion that can then be submitted by email to:
cleanair.consultations@defra.gsi.gov.uk

Additional copies:

You may make copies of this document without seeking permission. Other versions of the document such as Braille or large print can be provided on request. Please contact us using the details above to request alternative versions.

When considering responses to this consultation, the government will give greater weight to responses that are based on argument and evidence, rather than simple expressions of support or opposition.

At the end of the consultation

When this consultation ends, we will keep copies securely. Members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer automatically includes a confidentiality disclaimer, that won't count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

We will summarise all responses and place this summary on our website at www.gov.uk/defra. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.

Please give us 24 hours' notice if you wish to see consultation responses and summaries. There is a charge for photocopying and postage.

If you have any comments or complaints about the consultation process, please address them to:

Defra Consultation Co-ordinator,

Area 1C Nobel House 17 Smith Square London SW1P 3JR

or email: consultation.coordinator@defra.gsi.gov.uk