

CAMPAIGN FOR CLEAN AIR IN LONDON

“The cross-party campaign to achieve urgently and sustainably at least World Health Organisation recommended standards of air quality throughout London”

Campaign website: www.cleanairinlondon.org

Our reference: CAiL EC Consultations

Commission Vice-President Gunter Verheugen
Enterprise and Industry
European Commission
B – 1049 Brussels
Belgium

By email to: entr-emissions-euro-VI@ec.europa.eu

18 August 2007

Dear Commission Vice-President Verheugen

Public Consultation on future Euro VI emission limits for heavy duty vehicles

This contribution to the Public Consultation on the future Euro VI emission limits for heavy duty vehicles, which is due to close on 5 September 2007, is sent on behalf of the Campaign for Clean Air in London.

<http://europa.eu/rapid/pressReleasesAction.do?reference=IP/07/1100&format=HTML&aged=0&language=EN&guiLanguage=en>

We would not normally comment on a consultation by the European Commission about Euro emission standards but we consider that you have deliberately and sensibly raised a vitally important question, the answer to which can set a powerful framework for all aspects of the difficult and important trade-offs that will be necessary in coming years between Climate Change and Air Quality matters (and vice versa).

The Campaign for Clean Air in London

The Campaign for Clean Air in London has only one aim which is to achieve urgently at least World Health Organisation (WHO) recommended standards of Air Quality throughout London. Given that most of these have been required to be met since 1999 legislation by January 2005 (in respect of coarse particulate matter i.e. PM₁₀) and January 2010 (for nitrogen dioxide i.e. NO₂), we are campaigning to achieve sustainably at least WHO recommended standards of Air Quality throughout London by no later than the London 2012 Summer Olympics.

The Campaign for Clean Air in London has received support from the Mayor of London, leading politicians from the four main political parties in London as well as leading business and community groups including the Central London Partnership, London First and The Knightsbridge Business Group. We have also received a pledge of support from Environment Protection UK (formerly the National Society for Clean Air and Environmental Protection). Our campaign website is shown in the letterhead above.

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“The Air Pollution Trade-off Principle” (perhaps “The London Principle”)

Treating Air Pollution holistically requires difficult trade-off decisions between Air Quality and Climate Change issues. The Campaign for Clean Air in London encourages policy makers, like the European Commission, to accept a disbenefit of up to about 5% in Climate Change terms provided there is an associated benefit of over 50% in Air Quality terms (and vice versa) i.e. one to 10. Such an approach should be considered acceptable since large benefits may be hard to find and small disbenefits can be rectified relatively easily through a combination of other policy measures.

The Four Scenarios

The Campaign for Clean Air in London has the following comments on the European Commission’s individual examples:

Scenario A – This is the second best scenario. While there is a very small disbenefit in terms of carbon dioxide (CO₂), there are still major benefits compared to the worst scenarios although NO_x is still not as good as Scenario B.

Scenario B – This is the best scenario. While there is a small disbenefit in terms of CO₂, there is a major benefit in terms of NO_x and particulate matter emissions are still very low.

Scenario C – This is the worst scenario. While it is neutral in terms of CO₂, it offers poor results for NO_x and hydrocarbons.

Scenario D – This is the second worst scenario. It offers a sub-optimal result in several areas.

In our view, Scenarios A and B offer substantial benefits in Air Quality terms for small disbenefits in Climate Change terms. They are certainly consistent with “The Air Pollution Trade-off Principle” and much to be preferred over Scenarios C and D. If there are substantial and clearly defined financial cost or international competitiveness advantages in favour of Scenario A over Scenario B, for example by adopting standards close to those equivalent to the future United States emission standards, we would be willing to support Scenario A over Scenario B.

Obviously, whichever Scenario is chosen there will be consequences for the degree of stringency needed from other policy areas in order to meet European Union limit values for Air Quality.

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Timing of Euro VI and Euro VII proposals

We do not have a strong view *per se* as to whether the European Commission should present a proposal for Euro VI before the end of 2007 or whether it should prepare a proposal on the next two stages (Euro VI and Euro VII) if this means delaying the proposal and possibly the entry into force of the new emission limits by several months. Our strong view however is that a delay in either should only be acceptable if it results in meaningful and demonstrable benefits and does not result in more than, say, a six month delay in the implementation of the new emission limits.

We would be pleased to discuss or expand on any aspect of this letter if you or your officials consider it worthwhile. We can be contacted at the email address below.

Finally, thank you for taking seriously our concerns about Air Pollution in London and giving the issues we raise your particular attention. We recognise that you and others are already taking many steps that will improve Air Quality across Europe.

Please acknowledge receipt of this letter.

With best wishes.

Yours sincerely

Simon Birkett
Principal Contact
Campaign for Clean Air in London

By hand: Winston Fletcher, Chair, The Knightsbridge Association
Carol Seymour-Newton, Honorary Secretary, The Knightsbridge Association

Cc: Commissioner Dimas
The Rt. Hon. Hilary Benn MP, Secretary of State for Defra
Marianne Klingbiel, Head of Unit, Air Quality, Environment DG
Ken Livingstone, Mayor of London
Sian Berry, Principal Speaker and Green Party candidate for Mayor of London
John Bird, Independent candidate for Mayor of London
ORGANISATIONS
Amenity Societies
Helen Ainsworth, EU and International Air Quality, Defra
Jenny Bates, London Regional Campaigns Co-ordinator, Friends of the Earth

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James Bidwell, Chief Executive, Visit London
John Brewster OBE, Chairman, Port Health and Environmental Services Committee, Corporation of London
Patricia Brown, Chief Executive, Central London Partnership
Robert Buxton, Deputy Chairman, West London Residents Association
Sarah Dudgeon, National and Local Air Quality, Defra
Nick Fairholm, Transport for London
David Higgins, Chief Executive, Olympic Delivery Authority
Tim Hockney, Executive Director, London First
Professor Frank Kelly, Kings College London
Dr Michal Krzyzanowski, Regional Adviser, Air Quality and Health, WHO
Sarah Legge, GLA Principal Policy Adviser – Air Quality
Blake Ludwig, Campaign Director, Alliance Against Urban 4x4s
Professor Bob Maynard, Health Protection Agency
Paul McLoughlin, UK General Manager, Zipcar
Philip Mulligan, Chief Executive, Environment Protection UK
Derek Picot, Chairman, The Knightsbridge Business Group
Dr Gordon Taylor, Chairman, West London Residents Association
Dr Martin Williams, Head of Air and Environment Quality Division, Defra

LEADING POLITICIANS

Peter Ainsworth MP, Shadow Secretary of State, Defra, Conservative
Greg Barker MP, Shadow Minister for the Environment, Conservative
Mrs Gwyneth Dunwoody MP, Chair of the Transport Committee, Labour
Mark Field MP, Conservative
Chris Huhne MP, Shadow Environment Secretary, Liberal Democrat
The Rt. Hon. Michael Jack MP, Chairman of the Environment and Rural Affairs Select Committee
The Rt. Hon. Ruth Kelly MP, Secretary of State, Department for Transport, Labour
Susan Kramer MP, Shadow Secretary of State for Transport, Liberal Democrat
The Rt. Hon. Sir Malcolm Rifkind QC MP, Conservative
The Rt. Hon. the Lord Rooker, Minister of State, Defra
Joan Ruddock MP, Parliamentary Under Secretary of State
Jonathan Shaw MP, Parliamentary Under Secretary of State and Minister for the South East
Theresa Villiers MP, Shadow Secretary of State for Transport, Conservative
Phil Woolas MP, Minister of State, Defra
Tim Yeo MP, Chairman Environmental Audit Committee, Conservative
Gerard Batten MEP, London, Independence
John Bowis MEP, London, Conservative
Chris Davies MEP, Liberal Democrat
Robert Evans MEP, London, Labour
Mary Honeyball MEP, London, Labour
Syed Kamall MEP, London, Conservative
Ms Jean Lambert MEP, London, Green Party
Baroness Ludford MEP, London, Liberal Democrat
Linda McAvan MEP, Labour
Claude Moraes MEP, London, Labour
Charles Tannock MEP, London, Conservative

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Angie Bray AM, Leader of the Conservative Group, GLA
Tony Arbour AM, Conservative
Richard Barnes AM, Conservative
Robert Blackman AM, Conservative
Brian Coleman AM, Conservative
Roger Evans AM, Conservative
Elizabeth Howlett AM, Conservative
Bob Neill AM, Conservative
Andrew Pelling AM, Conservative
Jenny Jones AM, Leader of the Green Group, GLA
Darren Johnson AM, Chair of the Environment Committee, GLA, Green
Len Duvall AM, Leader of the Labour Group, GLA
Jeanette Arnold AM, Labour
John Biggs AM, Labour
Nicky Gavron AM, Labour
Joanne McCartney AM, Labour
Valerie Shawcross AM, Labour
Murad Qureshi AM, Labour
Mike Tuffrey AM, Leader of the Liberal Democrat Group, GLA
Dee Doocey AM, Liberal Democrat
Sally Hamwee AM, Liberal Democrat
Geoff Pope AM, Liberal Democrat
The Lord Tope, AM, Liberal Democrat
Peter Hulme Cross AM, One London Group, GLA
Damian Hockney AM, One London Group, GLA
Councillor Sir Simon Milton, Leader of the Council, WCC, Conservative
Councillor Alan Bradley, Chair, Go Green Board, WCC, Conservative
Councillor Merrick Cockell, Leader of the Council, RBKC, Conservative
Councillor Daniel Moylan, Deputy Leader, RBKC, Conservative
Councillor Frances Blois, WCC, Conservative
Councillor Tony Devenish, WCC, Conservative
Councillor Philippa Roe, WCC, Conservative
Councillor Dr Iain Hanham, RBKC, Conservative
Councillor Margot James, RBKC, Conservative
Councillor Mrs Shireen Ritchie, RBKC, Conservative
LOCAL GOVERNMENT OFFICIALS
Rebecca Brown, Environment Quality Unit, RBKC
Guy Denington, Team Manager, Environment Quality Unit, RBKC
Martin Low, Director of Transportation, WCC
Mike LeRoy, WCC
Mahmood Siddiqi, Chief Traffic Engineer, RBKC