

Mr Simon Birkett
Under the auspices of The
Knightsbridge Association
6 Montpelier Street
London SW7 1EZ

Dear Mr Birkett,

What is the DfT doing to ensure the UK meets EU Air Quality Limit Values?

Thank you for your letter of the 24th of October, in which you asked 15 crucial questions of the Department for Transport - these are answered below. As the two primary questions are encapsulated in the first two specific ones, I have responded to these with a combined answer.

1. What is the Department for Transport (DfT) doing now and planning to introduce as specific measures to ensure that the United Kingdom (UK) achieves the European Union's (EU) Limit Values for air quality throughout London given that road transport, particularly in so-called "hotspot areas", is the biggest single cause of exceedances?

The recent 'Air Quality Strategy for England, Scotland, Wales and Northern Ireland'¹, published in July 2007 by the Department for Environment, Food and Rural Affairs (Defra), highlights current DfT policies for tackling air pollution, as well as recommending new measures for consideration.

Local measures are clearly crucial to improving air quality. As such, Transport for London (TfL) is the main point of contact for London-specific measures (contact details available at <http://www.tfl.gov.uk/contact/default.aspx>).

2. By what date does the DfT consider currently that each of these binding EU legal obligations for air quality will be met for each of the regulated air pollutants?

Defra's 'Air Quality Strategy' lists the target dates for meeting EU obligations. It also receives and processes the vast majority of air quality data. We can provide no further information on this matter above and beyond that which you received in your recent Freedom of Information response from Defra.

¹ Available on Defra's website - <http://www.defra.gov.uk/environment/airquality/strategy/index.htm>

3. Is my understanding correct that the DfT is jointly responsible with the Department of Environment, Food and Rural Affairs (Defra) for the UK meeting its legal obligations in respect of the EU Limit Values for air quality? Assuming this belief is correct, will the DfT please make this responsibility explicit on its website e.g. in its aims and objectives, its organisation chart and elsewhere?

Yes, DfT shares a Public Service Agreement (PSA) target with Defra for air quality.

This is stated in the PSA section of the website:

<http://www.dft.gov.uk/about/how/psa/spendingreview2004psatargets1> and

<http://www.dft.gov.uk/about/how/psa/psatarget6> .

4. Will the DfT confirm please that it is treating air quality in its highest category of Ministerial level issues given that the UK is in breach of EU Legal Limits for air quality and now faces the possibility of enforcement action by the European Court of Justice?

As a current PSA target, air quality remains a priority issue and DfT is taking the possibility of EU action very seriously indeed.

5. Will the DfT please commit to consider air pollution holistically (i.e. air quality and climate change together) whenever it considers any air pollution related matters?

The importance of considering air quality and climate change co-benefits is repeatedly highlighted in the Air Quality Strategy. Where practicable and sensible, synergistic policies beneficial to both air quality and climate change will be pursued.

6. Will the DfT please reposition urgently “Act on CO₂” such that it advises citizens much more appropriately about vehicle choice? For example, the US Environment Protection Agency’s “Green Vehicle Guide” gives much more relevant, sophisticated and useful advice by highlighting an “Air Pollution Score” ahead of a “Greenhouse Gas Score”.

As part of the ‘Act on CO₂’ campaign, ‘Best on CO₂’ was launched on the 30th of July 2007 (www.dft.gov.uk/ActOnCO2/?q=best_on_co2_rankings). The rankings list the top ten cars in each class for low CO₂ emissions. Given the overall aim of the campaign, the focus is therefore weighted towards CO₂ emissions. However, it does include some advice on air pollutants and the important choice between petrol and diesel cars (http://www.dft.gov.uk/ActOnCO2/index.php?q=useful_tips).

Defra and DfT plan to investigate the possible incorporation of air quality into the ranking tables, potentially by highlighting those cars that meet Euro 5 standards. This will be of particular importance for Euro 5 diesel cars.

7. What action specifically is the DfT taking to actively and substantially discourage the driving of diesel engine vehicles in London? Please confirm that the emissions information given by Minister of State, Dr Stephen Ladyman, in a written answer to Mr Arbuthnot about “Motor Vehicles: Exhaust Emissions” on or about 25 June 2007 was correct (it was for different vehicle types in g/km) (please refer to Column 522W of Hansard).

London-specific transport measures are decided by Transport for London.

DfT and its agencies have worked very closely with TfL on the Mayor’s London Low Emission Zone (LLEZ). The Government fully supports the aim of the LLEZ, which is due to come into force in February 2008. DfT has assisted by running an alternative certification process and annual testing for Heavy Goods Vehicles, and by including parts of the trunk road network in the LLEZ.

Please refer to <http://www.tfl.gov.uk/roadusers/lez/default.aspx> for more information.

We have reviewed the 2005 fleet average emissions figures provided in response to Mr Arbuthnot’s question on 25th June 2007. These appear to be correct based on the data we have from the National Atmospheric Emissions Inventory. However, as noted in the response, the vehicle emissions test data underlying these figures is several years old and includes estimated figures for the performance of more recent vehicles. The Department is in the process of updating these based on recent test data including data on the actual performance of recent vehicles. In particular, the diesel NO_x figures are probably too low and the HGV CO₂ figures too high on the basis of recent test data.

8. What is the DfT doing to introduce technology and testing standards for the abatement of emissions of nitrogen oxides from vehicles of all sizes with particular reference to Selective Catalytic Reduction and its use in the UK’s current vehicle fleet (i.e. not just new vehicles)? When will these measures be implemented and with what estimated impact?

As regards the choices made by manufacturers and operators in the process of meeting the legislative limits on emissions of pollutants, DfT remains ‘technology neutral’.

Through its Type Approval work, the Vehicle Certification Agency (VCA) ensures that all new models of cars coming onto our roads meet EU emissions standards. As regards the whole UK fleet, almost all types of vehicles must go through an emission check as part of the annual MOT testing procedures. In-service testing is one of several measures designed to reduce pollution from vehicle emissions. The MOT tests are kept under review in response to developments in vehicle technology to ensure an appropriate framework.

9. Why did the DfT “scrap” recently the only DfT programme that seemed to incentivise actively the adoption of alternatively fuelled, low emission, vehicles?

In June 2006, DfT announced that it was withdrawing the following programmes:

- Low Carbon Bus Programme - to provide grants to bus operators for purchasing low carbon buses.

- Low Carbon Vehicle Programme - grants to encourage the purchase of low carbon cars and car-derived vans.
- Air Quality Retrofit Programme - grants for fitting conversions and exhaust systems to existing vehicles.
- Air Quality Vehicle Programme - purchase grants based on air quality standards at EEV levels for new buses and trucks.

For the four programmes, analysis showed poor value for money - the costs outweighed the benefits in terms of carbon or air pollutant emissions saved. This would not have been a good use of taxpayers' money.

The 'Low Carbon Vehicle Programme' could only fund 0.36% of the new car market. The 'Low Carbon Bus Programme' could only fund around 1% of the new bus market. Air quality programmes could fund less than 1% of the market. This would not have brought about significant market transformation.

The Air Quality Strategy published in July 2007 identified increased uptake of low emission vehicles as a potentially cost-beneficial measure, although a full impact assessment of the implementation options is yet to be undertaken.

10. Will the DfT commit to rebalancing and modifying fuel tax so that it treats air pollution emissions holistically rather than favouring diesel fuel as currently (with its slightly lower CO2 emissions but its much higher emissions of the hazardous air pollutants)?

DfT is not responsible for the setting of duty rates for fuel, as this is a matter for the Chancellor. This question therefore needs to be directed to HM Treasury. They can be contacted at the following address: public.enquiries@hm-treasury.gsi.gov.uk .

11. Will the DfT commit to rebalancing and modifying Vehicle Excise Duty (VED) banding so that it treats air pollution emissions holistically instead of unbalancing the incentives in favour of diesel engines?

Again, although the Driver and Vehicle Licensing Agency (DVLA) are responsible for the collection of VED, any modification of the banding is a Treasury matter.

12. What information does the DfT hold about air pollution emissions per kilometre for different types of motorcycles?

The emissions factors that DfT have for motorcycles are those prepared for Defra by AEA Technology limited and are available at http://www.naei.org.uk/other/vehicle_emissions_v8.xls .

The emissions factors are summarised in table 3.6 of the Department's publication, 'Transport Statistics for Great Britain', available at <http://www.dft.gov.uk/pgr/statistics/datatablespublications/tsgb/> .

13. What action is the DfT taking to ensure that the use of biofuels in the UK is sustainable and takes full account of the need to meet air quality legal obligations?

The UK Government is aware of the concerns that some biofuels might come from unsustainable sources, such as where rainforests have been cleared to grow energy crops. To address this, the Renewable Transport Fuel Obligation (RTFO) Order 2007 includes a reporting requirement from Day One, under which any transport fuel supplier wishing to claim an RTF certificate in respect of any biofuel must submit a report detailing its environmental impacts.

It is expected that companies will report both on a monthly and annual basis and that the reports will include information such as the carbon intensity of the biofuel, origin of the feedstock, any environmental or social standards in operation during the cultivation of the feedstock, and changes in the land-use. In addition annual reports will include information on a company's activities to improve data capture or activities to improve the sustainability of the fuels they source.

The Renewable Fuels Agency, as Administrator of the scheme, will publish reports comparing the performance of different suppliers and the biofuels they have supplied, and it is expected that this 'league table' effect will encourage better performance.

DfT has conducted research on the air quality emissions impacts of low level ethanol and FAME biodiesel blends as well as that of straight vegetable oil:

<http://www.dft.gov.uk/pgr/roads/environment/research/ethanolemissionstestingmainr3843>
<http://www.dft.gov.uk/pgr/roads/environment/research/cqvcf/dftbiofuelevaluationofemiss3823>

No significant adverse impact on regulated air quality emissions was detected for 10% ethanol blends or 5% biodiesel blends. Increases in acetaldehyde emissions were detected on some vehicles when using 10% ethanol fuel. Although not a regulated pollutant, this is of potential concern as an ozone precursor. The Department has therefore pushed, in on-going negotiations on the EU Fuel Quality Directive, for the European Commission to conduct a review of the air quality impacts before proposing further increases in the permissible ethanol content of petrol. In these same negotiations, we are opposing any relaxation in petrol summer vapour pressure limits for fuel containing ethanol, in order to prevent increases in evaporative hydrocarbon emissions.

14. What incentives is the DfT proposing to encourage the early adoption of the much cleaner Euro 4/IV and Euro 5/V engines in London and to scrap the oldest, most polluting, vehicles when Defra's new National Air Quality Strategy made clear that transport related measures offer exceptionally favourable benefit to cost ratios?

The Air Quality Strategy suggested three new measures that could, if implemented, generate significant net benefits. That is not to say that all transport-related measures offer favourable benefit-to-cost ratios.

DfT recognize the crucial role that tighter Euro standards play in improving air quality. As such, we are extending the Reduced Pollution Certificate scheme to offer reduced road tax to Heavy Goods Vehicles and buses meeting the Euro V standards ahead of the date that this becomes mandatory (1 October 2009). Please refer to <http://www.transportoffice.gov.uk/crt/vehicleowners/vehicletests/specialisttests/environmentalvedtest/rpcsforearlycomplianteuro5andeevvehicleswithnoxcontrol.htm>. Euro 4 and IV standards are already mandatory.

For information on specific London measures, please contact Transport for London (contact address as previously stated).

15. What specific action is the DfT taking to assist London to introduce urgently dynamic road pricing (“tag and beacon” or the equivalent) to replace in full the current “blunt instrument” of congestion charging? What more needs to be done to implement this mechanism quickly across London?

This is again a matter for TfL.

Once again, thank you for your letter. I trust that these answers will be of use to you.

Yours sincerely,

Andrew Gilheany

Environmental Policy Advisor