

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

Commissioner Dimas
Commissioner for Environment
Environment Directorate-General
European Commission
B-1049 Brussels

By registered post and email: stavros.dimas@ec.europa.eu

1 November 2008

Dear Commissioner Dimas

Did the UK meet the European Commission’s deadline of 31 October to notify a request for a time extension to comply with European Union air quality laws for particulate matter (PM₁₀)?

Baroness Gardner will ask this question in the House of Lords on Tuesday 4 November 2008

The Campaign for Clean Air in London urges the European Commission to launch legal action against the UK now on PM₁₀ pollution and in early 2009 on nitrogen dioxide (NO₂) pollution

‘The London Matrix’: Air quality or climate change, it’s about air emission reduction deadlines

Summary

I am writing to you on behalf of the Campaign for Clean Air in London (CCAL) on two matters.

First, please will you confirm whether the United Kingdom (UK) notified fully the European Commission (Commission) by its deadline of 31 October 2008 of a request for a time extension to comply with European Union (EU) air quality laws for particulate matter (PM₁₀) in the manner requested by the Commission in its press release dated 8 July 2008. CCAL understands that the UK government intended to miss that deadline. A link to the Commission’s announcement is shown below:

<http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/1112&format=HTML&aged=0&language=EN&guiLanguage=en>

To underline the significance of this deadline, Baroness Gardner of Parkes has lodged a Topical Question to be answered in the House of Lords shortly after 2.45 pm on Tuesday 4 November. It reads:

Baroness Gardner of Parkes to ask Her Majesty’s Government whether they requested by 31 October a derogation from the European air quality directive for particulate matter in order to avoid legal action for potential breach of the limits in 2005, 2006 and 2007.

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Baroness Gardner highlighted the importance of meeting air quality deadlines also in the House of Lords on 9 October 2007. You can see the full text of that debate via the link below:

<http://www.theyworkforyou.com/lords/?id=2007-10-09a.117.0&s=speaker%3A13304#g117.3>

CCAL has today submitted a Freedom of Information Request/Environmental Information Request to the Department for Environment Food and Rural Affairs (Defra) asking it to provide similar information.

Second, if the UK failed to comply fully with the Commission’s request for information by the above deadline, as CCAL suspects, CCAL urges the Commission to launch by 30 November 2008 robust legal action against the UK for breaching EU air quality limit values (Limit Values) for PM₁₀ in 2005, 2006 and/or 2007 as it has been entitled to do for some time.

In CCAL’s carefully considered view, Europe is today at a crossroads in terms of its ability (or failure) to tackle air pollution. This is because:

- the Limit Values for PM₁₀ have been due, since 1999 legislation, to be complied with by January 2005;
- the new EU directive on ambient air quality and cleaner air for Europe (the new AQ Directive) entered into force on 11 June 2008 with specific provisions to tackle this problem;
- the Limit Values for PM₁₀ (and NO₂) are the bare minimum needed to protect human health and the environment. Particulate matter air pollution alone causes some 350,000 deaths per annum now across Europe;
- the Commission set a reasonable deadline for notifying requests for time extensions for PM₁₀;
- Europe’s credibility at reducing air pollution emissions is at stake now;
- the UK government is ‘playing games’ with the Commission;
- leading UK NGOs have called for the government to comply fully with air quality laws; and
- last but not least, the Commission said on 8 July 2008 that legal action would follow if any Member State did not submit a notification for a time extension by the deadline and so it must.

Please therefore enforce air quality laws now and send a message to those attending the United Nations Climate Change Conference in Poznan from 1 to 12 December that Europe is serious about complying with the environmental obligations that it sets. Lack of action before then would lead to suspicions that no enforcement action on air pollution is likely ever in Europe. If air pollution laws are not going to be

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complied with and/or enforced, it is better not to have them in the first place. This is a very serious message for those going to Poznan.

1 November 2008 will be remembered as the time when Europe showed it had the political will to tackle its toughest air pollution problems or failed to do so.

The Campaign for Clean Air in London

The Campaign for Clean Air in London has only one aim which is to achieve urgently and sustainably 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), CCAL's immediate priority is to press for air quality laws to be complied with fully in each year leading up to the London 2012 Summer Olympics.

CCAL has received support from Mayor Johnson (and previously Mayor Livingstone), 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. CCAL has also received a Pledge of support from Environmental Protection UK (formerly the National Society for Clean Air and Environmental Protection). CCAL's campaign website address is shown in the letterhead above.

‘The London Matrix’: Air quality or climate change, it’s about air emission reduction deadlines

CCAL considers that the problems of air quality and climate change locally and internationally can be represented in ‘The London Matrix’. This matrix has two rows (air quality and climate change) and two columns (London and the Rest of the World). London could be replaced by any capital city and the Rest of World could be replaced by the Rest of the Europe (or any region).

Air quality and climate change are inextricable linked since both problems:

- can often be traced back to the same source of emissions into the air (whether aircraft and airports, power generation or road transport);
- are extremely costly (for example the Rogers Review in 2006 estimated that, in 2005, the UK's annual cost of health impacts from particulate matter alone was between £9.1 billion and £21 billion per annum);
- will be solved by targeting the biggest occurrences of pollution with technology-based solutions and creating a ‘tipping point’ of behavioural change. The “polluter must pay” and political will is essential;
- require that air emission reduction deadlines are met; and

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- have been highlighted as being closely linked by both the Intergovernmental Panel on Climate Change and the UK government’s Air Quality Expert Group. In particular they have both emphasised the importance of the inter-relationship not least in terms of identifying cost efficiencies and health benefits.

In respect of air quality, the government admitted in its 2007 consultation on plans and programmes to comply with Limit Values for PM₁₀, that road transport is the primary cause of all breaches of the Limit Values for PM₁₀ in London. The Minister for Air Quality, Jonathan Shaw MP, made clear on 17 July 2008 that “pollution [in London] is principally brought about by traffic”:

<http://www.theyworkforyou.com/debates/?id=2008-07-17a.388.0&s=shaw+%22air+quality%22#g388.2>

In respect of climate change, the Commission says that urban mobility accounts for up to 40% of all carbon dioxide (CO₂) emissions of road transport.

http://ec.europa.eu/transport/clean/index_en.htm

In terms of triggering any meaningful and time critical change, it is necessary to ‘grasp the biggest nettle first’. For air quality, the greatest problem lies in the largest cities. Similarly, with the C40 Cities Climate Change Group saying that the 50% of people who live in cities (set to reach 60% by 2030) are responsible for 80% of greenhouse gas emissions, it is clear that the climate change problem will be won or lost in cities.

In CCAL’s view therefore, what happens now that the final deadline has been reached on air quality in London (and in all the capital cities in Europe that are breaching air quality laws for PM₁₀) is a high profile test case which will show whether Europe will be able to reduce air pollution overall. We are at a ‘tipping point’ of credibility, cost and political will.

CCAL calls this ‘The London Matrix’: if air quality can be tackled successfully and by legally binding deadlines in London, it gives hope that air pollution everywhere, including climate change, can similarly be tackled.

| THE LONDON MATRIX | | |
|--------------------------|---------------|----------------------|
| | London | Rest of World |
| Air quality | Now | |
| Climate change | 2020/2050 | 2020/2050 |

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CCAL therefore read with interest your insightful and inspiring speech at the Climate Change Conference in Prague yesterday. In your opening words you said:

“Climate change has been described by UN Secretary-General Ban Ki-moon as the ‘defining challenge of our age’ and is a challenge that is not simply going to disappear. Our generation will be remembered as the first to be offered solid scientific evidence of climate change. It is now our responsibility to ensure that we are also remembered as the generation which took decisive action to mitigate it – preventing the worst consequences and minimizing the impact of consequences we could not avoid.

“Some might think that we would do better to focus our attention on the financial crisis. Vigorous action is of course needed there too but we must not repeat the mistakes of the past. The current financial crisis is largely a story of warnings unheeded or dismissed. Being late in responding to climate change would be even more devastating – and far more costly.”

<http://europa.eu/rapid/pressReleasesAction.do?reference=SPEECH/08/570&format=HTML&aged=0&language=EN&guiLanguage=en>

It reminded us of your powerful speech on ‘Environmental Priorities for 2009’ to the European Parliament Environment Committee on 19 May 2008, when you said:

“In recent years, we have established priorities, set out far-reaching objectives, adopted concrete measures to protect our environment and enhance quality of life. We have made sustained progress that was unimaginable a decade ago.

“For 2009, the key message is that timely implementation of existing legislation is vital and there is a need to ‘encourage’ Member States that are lagging behind in one area or another...”

“As our scientific awareness grows, so does our understanding of the fragility of our planet. Many challenges remain and new ones continue to emerge. They must be addressed – in a firm and practical way – because deforestation, biodiversity loss, excessive waste volumes, fresh water pollution and rising greenhouse gas emissions are not features of the world that we should leave to future generations.

“2009 is the last year of the mandate of this Commission and of this Parliament. Let’s make the most of it.”

<http://europa.eu/rapid/pressReleasesAction.do?reference=SPEECH/08/254&format=HTML&aged=0&language=EN&guiLanguage=en>

Please therefore, close your ears to the ‘siren voices’ that will argue for delay, compromise and muddle when it comes to enforcing air quality laws. These are the same siren voices that argued against the creation and enforcement of the Clean Air Act introduced in the UK in 1956. In this context, please

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remember too that the Commission has found that particulate matter air pollution alone results in some 350,000 premature deaths per annum in Europe:

<http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/07/108&format=HTML&aged=0&language=EN&guiLanguage=en>

and the UK estimates that it causes between 12,000 and 24,000 premature deaths per annum in the UK.

Lastly, whatever similarities are drawn, there are two fundamental differences between the current financial crisis and climate change: first, once climate change has happened it is effectively irreversible; and second, there is a deadline which must be met if climate change is to be stopped from passing a ‘tipping point’.

Legal action must follow now to enforce air quality laws in London

CCAL considers it essential that legal action is taken quickly and even handedly against the UK and all other Member States that have missed the Commission’s deadline of 31 October 2008.

As you know, the process for dealing with infringements of EU law, including details of the unlimited lump sum and daily fines that can be imposed, is set out on the Commission’s website:

http://ec.europa.eu/community_law/infringements/infringements_en.htm

In CCAL’s view, the Commission should speed through the process of any remaining written warnings and ask the European Court of Justice (ECJ) to impose its first stage judgement against the UK. In CCAL’s view, this judgement should set a short deadline for the UK to comply with Limit Values for PM₁₀ (certainly shorter than the deadline allowed for Member States that are complying with the new AQ Directive). If the UK misses that deadline, the Commission should revert quickly to the ECJ and press for the unlimited lump sum and daily fines that may be needed to precipitate action finally by the UK government.

It does not matter whether legal action is taken against two or more than 20 countries, the key point is that every Member State which breached the Limit Values for PM₁₀ in 2005, 2006 and/or 2007 and failed to submit a notification by the required deadline must now be subject to infringement action.

In CCAL’s view, the most important reasons for urging the Commission to act now include:

1. the Limit Values for PM₁₀ have been due, since 1999 legislation, to be complied with by January 2005.

The current legal regime for air quality, including the Limit Values for PM₁₀ and NO₂, dates back to 1999 legislation. This legislation required Member States, including the UK, to achieve the Limit Values for PM₁₀ and NO₂ by 1 January 2005 and 1 January 2010 respectively with no time

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extensions or derogations possible. The UK breached the Limit Values for PM₁₀ in London in each of 2005, 2006 and 2007 and will remain in breach of air quality laws in respect of each of those years (and the government currently expects for every year out to 2011 and beyond) unless it obtains a time extension with a derogation for past failings.

2. The new AQ Directive entered into force just four and a half months ago.

In CCAL's view, a key reason for needing the new AQ Directive was that the earlier legal regime, which dates back to 1999, did not have any legal framework to address the breaches of air quality laws for PM₁₀ that have taken place in 2005, 2006 and 2007 in cities such as London. It was pass or fail (and the UK failed).

As you know, the new AQ Directive entered into force on 11 June 2008. The full text of the new AQ Directive can be found at:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF>

3. The Limit Values for PM₁₀ (and NO₂) are the bare minimum needed to protect human health.

Fine particulate matter (so called PM_{2.5}) comprises typically 60-70% of PM₁₀ i.e. the annual average Limit Value for PM₁₀ of 40 micrograms per cubic metre (µg/m³) is equivalent to a figure of about 25-30 µg/m³ of PM_{2.5}. The WHO says there is no safe level of exposure to particular matter and recommends that maximum average annual exposure to PM_{2.5} should not exceed 10 µg/m³ i.e. much less than half the level implied by the current annual average Limit Value for PM₁₀.

4. the Commission set a reasonable deadline for notifying requests for time extensions for PM₁₀.

The new AQ Directive did not set an explicit deadline by which Member States had to notify a request for a time extension to the Commission.

Instead, the new legislation allowed the Commission to set its own deadline by allowing it to launch, whenever it considered appropriate, legal action against the Member States that were in breach of Limit Values for PM₁₀ in 2005, 2006 and/or 2007 – unless they had obtained a time extension with a derogation for past breaches of the same air quality laws.

With CCAL's full encouragement, including an email it sent dated 16 May 2008, the Commission set a deadline of 31 October 2008 for Member States to notify a time extension request under the new AQ Directive.

In CCAL's view, the deadline set by the Commission was very reasonable. Member States had agreed to this mechanism in December 2007 (in the Compromise Agreement with the European Parliament and the Commission); they had approved the precise legislation in April 2008 and

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they were then allowed four months and a half months after the new AQ Directive entered into force. Importantly also, given that the final backstop date for complying with Limit Values for PM₁₀ is June 2011, it is essential that governments publish their plans and programmes to meet those obligations in good time so that all stakeholders have the time and certainty needed to play their part in delivering them.

In its July announcement, the Commission necessarily made clear that legal action would follow, presumably in terms of enforcing existing Limit Values for PM₁₀, if the deadline was missed.

5. Europe’s credibility at reducing air pollution emissions is at stake now.

In CCAL’s view, there are at least three reasons why Europe’s credibility at being able to reduce air pollution emissions is at stake now:

- the content of the new AQ directive was a hard fought compromise. Many MEPs, who wanted a tightening of the Limit Values, will rightly be furious if the new AQ Directive is not fully enforced just four and a half months after it entered into force;
- the EU’s promises of reducing emissions by 20% by 2020 at the United Nations Climate Change Conference scheduled to take place in Poznan from 1 to 12 December 2008 will be no more than hollow words if it has still not enforced existing harmful air pollution standards just days beforehand.

http://unfccc.int/meetings/cop_14/items/4481.php ; and

- similarly, if the UK government fails to comply fully with its legal obligations now in respect of air quality, its Climate Change Bill with five year carbon budgets and 2020 and 2050 targets are hollow words and totally meaningless.

The Commission and the government either have the political will to enforce air pollution laws or they do not.

6. The UK government is ‘playing games’ with the Commission and seems intent on pursuing its own narrow agenda rather than complying with legislation that is intended to protect the lives of tens of thousands of its citizens.

CCAL wishes to bring to your attention that:

- the UK has obviously known about these obligations since 1999, December 2007, April 2008, June 2008 and July 2008;
- the UK government’s argument that it must hold a public consultation next year on how it intends now to comply with Limit Values for PM₁₀ (with a view to submitting its

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notification by June 2009) is without foundation. It conducted virtually the same consultation in 2007 which closed on 7 November 2007 and was reported to the Commission by 31 December 2007. It is incredible that the government should say now, after all the warnings it has had, that it needs up to six months more time this year than it took last year to complete essentially the same task. For your information, the UK completed its consultation on its report on plans and programmes to comply with Limit Values for NO₂ this week on 28 October 2008;

- the UK government is still obsessed by using its own cost-benefit analysis approach, that uses its own measures for each of cost and benefit, which may have been appropriate to the 19th or 20th centuries. The environmental challenges of the 21st century require prioritisation and cost-effective compliance with deadlines;
- the UK's choice of June 2009 to submit its notification is surely intended to coincide with elections for the next European Parliament in June 2009, the end of the current Commission's mandate in October 2009 and the possibility of a UK election before its due date in 2010;
- in CCAL's view, the UK government will struggle to comply with the pre-conditions for a time extension since it would probably have to prove, amongst other things, that one of the causes of the breaches of Limit Values for PM₁₀ in 2005 was transboundary air pollution arriving in the UK against the prevailing winds. The difficulty of making such a case may have caused the government to decide to bear and/or provoke infringement action instead of facing further humiliating failure when the Commission rejected its time extension notification; and
- while the (Labour) government has the legal duty to comply with the various EU air quality directives, it is the (Conservative) Mayor of London who will need to deliver (and perhaps finance) most of the needed solutions. By way of example, please note that the current London Low Emission Zone is unlike that in many cities across Europe in that it is not yet focussed, as it will need to be, on the most polluted parts of the city and it does not yet set any specific requirements to tackle emissions of oxides of nitrogen (which partly explains why London has the highest annual average levels of the toxic gas, NO₂, of any capital city in Western or Eastern Europe). Please note too that, in a game of high stakes, the Mayor of London has said that he plans to publish for consultation his Air Quality Strategy by June 2009 (after the UK has passed its own chosen deadline with the Commission).

The tactics are quite transparent and should be dismissed by the Commission. There is no time to waste with over 1,000 people per annum dying prematurely in London from exposure to particulate matter air pollution alone.

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7. Leading UK NGOs have called for the government to comply fully with air quality laws.

CCAL joined 11 leading UK Non-Governmental Organisations (NGOs) in a letter to the Prime Minister dated 16 June 2008 in inviting the government to commit to comply fully with air quality laws. A copy of that letter can found via the link below:

http://www.cleanairinlondon.org/blog/_archives/2008/6/16/3747824.html

The NGOs letter included the following:

“If the UK does not meet its short term obligations for air quality, what chance is there that it will meet five-year carbon budgets and longer-term commitments introduced in the Climate Change Bill?”

“An unambiguous commitment now from the Government backed thereafter by prompt and meaningful action will give stakeholders of all types, whether from business, the non-governmental sector or citizens generally, the certainty and time necessary to play their full part in delivering the required changes in the most cost effective manner.”

Without the certainty provided laws that are complied with and/or enforced, it will be much more difficult for people to adjust and business to invest. How can those entering green industries, and their investors, have any confidence that any air pollution laws will be enforced if they are not now? Everyone would be better off with no such laws since time would not be wasted and investment could proceed at its own pace.

The reply from the Minister for Air Quality declined to give this commitment and showed that the government had no plans to comply with air quality laws;

8. last but not least, the Commission said on 8 July 2008 that legal action would follow if any Member State did not submit a notification for a time extension by the deadline and so it must.

There is clearly a need to take legal action against the UK now for breaching Limit Values for PM₁₀ in 2005, 2006 and/or 2007. If the UK does eventually submit a notification for a time extension in whole or in part in due course, please ensure that it complies fully with relevant air quality laws.

CCAL urges you and those copied to press immediately for legal action to force the UK to comply fully with air quality laws. The UK government has had its last chance and is clearly determined not to take its air pollution obligations seriously.

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It is important that action is taken also to reinforce Limit Values for nitrogen dioxide

While there is understandably a focus now on compliance with EU air quality limit values for PM₁₀, CCAL urges you not to forget the crucial importance of the main other regulated air pollutant, nitrogen dioxide (NO₂).

The recent European Urban Audit of 321 European cities ranked London as having the highest average annual NO₂ of all 27 capital cities in Western and Eastern Europe. This is a shocking statistic for those of us who live in London. It is also a powerful reminder again of the UK government's dithering when it comes to complying with air pollution legislation. A government of fine words, but no action.

<http://www.urbanaudit.org/rank.aspx>

CCAL replied recently to the UK's consultation on its report on plans and programmes to comply with EU air quality limit values for NO₂. You were copied on that response. In that letter, CCAL said:

“In CCAL's view, the report does not meet the requirements of Annex IV of the relevant EU Directive. CCAL is therefore copying this letter to Commissioner Dimas and urging him please to reject the UK's report and to commence necessary enforcement action against the UK for failing to meet its reporting requirements – unless these points are addressed fully in its submission as required by 31 December 2008.”

CCAL is concerned particularly that a failure at this stage by the UK to produce credible, adequately funded plans to comply with the Limit Values for NO₂ by January 2010 (and/or to have a contingency plan that would allow it to meet the conditions of Article 22, paragraph 3 in respect of the Margin of Tolerance), is in effect allowing or encouraging the UK to miss that deadline and those requirements.

Please therefore act now to put meaning behind the Limit Values for NO₂ rather than waiting until they are breached and reported upon in 2010 and 2011 respectively.

In this context, please do not forget the importance also of enforcing the requirements of the National Emissions Ceiling Directive where the UK has admitted it will fail to meet the January 2010 deadline for oxides of nitrogen by some 10%.

Finally, CCAL wishes to record here its sincere thanks for all that you and your staff have done and continue to do to improve air quality across Europe.

Please confirm whether the UK notified the Commission by its deadline of 31 October 2008 of a request for a time extension to comply with European Union air quality laws for PM₁₀ in the manner requested by the Commission in its press release dated 8 July 2008. There is no need to reply further to this letter, unless you wish to do so, since CCAL would rather the Environment DG puts its resources into managing infringement action against the UK.

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Please acknowledge receipt of this letter to the email address provided separately.

With best wishes.

Yours sincerely,

Simon Birkett
Principal Contact
Campaign for Clean Air in London

Enclosures:

Letter to the UK government on its plans and programmes to comply with Limit Values for NO₂
Letter from CCAL and leading NGOs to the Prime Minister

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

Cc: President Barroso
The Rt. Hon. Gordon Brown MP, The Prime Minister
Mogens Peter Carl, Director-General, Environment DG
Jos Delbeke, Directorate C: Climate Change and Air, Environment DG
Stefan Moser, C3 Clean Air & Transport, Environment DG
The Rt. Hon. Hilary Benn MP, Secretary of State for Environment, Food and Rural Affairs
The Rt. Hon. Geoff Hoon MP, Secretary of State for Transport
The Rt. Hon. the Lord Hunt of Kings Heath, Minister of Air Quality, Defra
Mayor Johnson
Sir Simon Milton, Deputy Mayor for Policy and Planning
Ken Livingstone, Candidate for Mayor of London in 2012
ORGANISATIONS
Amenity Societies
Helen Ainsworth, EU and International Air Quality, Defra
Jenny Bates, London Regional Campaigns Co-ordinator, Friends of the Earth
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
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

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Philip Mulligan, Chief Executive, Environment Protection UK
Derek Picot, Chairman, The Knightsbridge Business Group
Dragomira Raeva, Air Policy Officer, European Environmental Bureau
Dr Gordon Taylor, Chairman, West London Residents Association
Robert Vaughan, NO2 Plans and Programmes, Defra
Dr Martin Williams, Head of Air Quality and Industrial Pollution Programme, Defra

LEADING POLITICIANS

Peter Ainsworth MP, Shadow Secretary of State, Defra, Conservative
Tim Farron MP, Shadow Secretary of State for EFRA, Liberal Democrat
Mark Field MP, Conservative
The Rt. Hon. Michael Jack MP, Chairman of the Environment and Rural Affairs Select Committee
Susan Kramer MP, Shadow Secretary of State for Transport, Liberal Democrat
The Rt. Hon. Sir Malcolm Rifkind QC MP, Conservative
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
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
Richard Barnes AM, Deputy Mayor and Leader of the Conservative Group, GLA
Tony Arbour AM, Conservative
Gareth Bacon AM, Conservative
Andrew Boff AM, Conservative
Victoria Borwick AM, Conservative
James Cleverly AM, Conservative, Conservative
Brian Coleman AM, Conservative
Roger Evans AM, Conservative
Kit Malthouse AM, Deputy Mayor for Policing, Conservative
Steve O’Connell AM, Conservative
Richard Tracey 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
Murad Qureshi AM, Labour
Navin Shah AM, Labour

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Valerie Shawcross AM, Labour
Mike Tuffrey AM, Leader of the Liberal Democrat Group, GLA
Dee Doocey AM, Liberal Democrat
Caroline Pidgeon AM, Liberal Democrat
Councillor Colin Barrow, Leader of the Council, WCC, Conservative
Councillor Danny Chalkley, Transport and Environment, 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 Quentin Marshall, 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