

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

9<sup>th</sup> October 2009

Dear Commissioner

## **Request for the European Commission to Reject the UK Application for a Time Extension for Meeting PM<sub>10</sub> Limit Values in Greater London**

I am writing to request that you reject the UK's application, made earlier this year, for a time extension for meeting European PM<sub>10</sub> limit values in the Greater London area. Following the release of the draft Mayor's (of London) Air Quality Strategy last week we do not believe that a robust plan is in place for meeting the PM<sub>10</sub> limit values by the extended June 2011 deadline.

London presents the UK's biggest challenge for meeting European air quality limit values. Modelling undertaken by DEFRA (the UK Department of Environment Food and Rural Affairs) to support the UK's PM<sub>10</sub> time extension application earlier this year demonstrated that a significant package of targeted measures would be needed to ensure PM<sub>10</sub> limit values were met across Greater London by June 2011. In our view the draft Mayor's Air Quality Strategy, released on the 5<sup>th</sup> October, lacks this substantive package of policies, and, without further measures, exceedances are therefore likely to continue beyond June 2011.

Whilst the draft Mayor's Air Quality Strategy contains several good policies for addressing non-transport sources of air pollutants, many of the measures proposed for addressing transport emissions are weak, unfunded, and likely to be of questionable effectiveness. Specifically we'd like to draw your attention to the following points:

- Many of the proposed transport measures to improve air quality are poorly developed, difficult to quantify, unfunded and dependent on the (unconfirmed) support of organisations that are not under the Mayor's direct control. Examples include new 'inner' Low Emission Zones to tackle poor air quality hotspots (p50) which are given only vague acknowledgment;
- Phase 3 of the London Low Emission Zone (LEZ), a key measure for improving air quality in London and a major part of the UK's Time Extension Notification (TEN), has been delayed until 2012. Many other proposed measures will also not come into force until 2012 (e.g. taxis measures, page 42);

- The Mayor has repeatedly stated that he will remove the western extension of the congestion-charging zone (WEZ) by the end of 2010. The draft strategy makes only vague references as to how the negative air quality impacts of this move will be mitigated.

We believe that the lack of substantive action in the draft Mayor's Air Quality Strategy further undermines the UK's eligibility for a PM<sub>10</sub> time extension for the Greater London area. As part of the current consultation on the draft strategy Environmental Protection UK will formally respond to the Greater London Authority, and we will copy you in on our response.

The European Union has a strong framework for improving air quality and public health, largely as a result of the hard work of your team at the Commission. Rejecting the UK's time extension notification will send a powerful signal to the UK and other member states that intentions to comply with air quality limit values need to be backed by meaningful, quantifiable actions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Dearnley', is positioned above the typed name.

Ed Dearnley  
Policy Officer