

The Rt. Hon Rebecca Pow MP  
Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs

Via Email: [rebecca.pow.mp@parliament.uk](mailto:rebecca.pow.mp@parliament.uk)

The Rt. Hon George Eustice MP  
Secretary of State for Environment, Food and Rural Affairs

Via Email: [george.eustice.mp@parliament.uk](mailto:george.eustice.mp@parliament.uk)

5<sup>th</sup> October 2020

Dear Ministers,

### **Enshrining WHO air quality guidelines into law in the UK**

We urge you to enshrine the World Health Organization air quality guidelines into law as the legally-binding targets for particulate matter (PM<sub>10</sub>) and fine particulate matter (PM<sub>2.5</sub>) within the Environment Bill 2019-2021, to be effective immediately and with 2030 set as the deadline for compliance.

Exposure to air pollution is recognised as one of the leading causes of mortality in the UK, and Public Health England attributes up to 36,000 deaths each year to poor air quality. In addition to the death toll, the long-term degradation of wellbeing and the immense societal cost imposed by air pollution represents a health crisis and a burden that our communities have borne for too long.

The Clean Air Strategy 2019 acknowledges that '*Air quality is the largest environmental health risk in the UK*', and commits to setting a new and ambitious long-term target to cut public exposure to fine particulate matter.

It is evident that collective effort at national and international scale is required to tackle particulate pollution, and we must not wait for polluters to voluntarily take the lead in addressing the air quality crisis, which Public Health England estimates may cost the UK as much as £5.3 billion by 2035.

Whilst we have seen encouraging improvement in NO<sub>x</sub> levels in the UK, our progress on particulates has stagnated. It has become painfully evident in these unprecedented times that air pollution imposes an alarming fragility to our respiratory health, and that this disproportionately impacts those communities which have historically been more exposed to air pollution.

In the Camden 2025 community vision for the borough, Camden's citizens unequivocally identified clean air as a key priority, with the notion that no one in Camden should experience poor health as a result of exposure to air pollution. Camden Council formally adopted the WHO guideline values for PM<sub>10</sub> and PM<sub>2.5</sub> in January 2018 in response to this call to action, and our ambitious objectives have provided clarity and definition for our work to improve air quality for the benefit of all those who live, work and study in the borough.

Air quality targets alone are not the solution, but they set the goalposts and provide a vital framework to underpin air quality and emissions-abatement provisions in subsequent legislation relating to the environment, planning, industry, agriculture, and transportation policy.

The Environment Bill 2019-2021 provides a unique opportunity to set out these crucial air quality targets and other long-term environmental protections which will be so important for safeguarding human health and natural environments in the UK after our departure from the European Union.

The World Health Organization guideline values for annual mean PM<sub>10</sub> and PM<sub>2.5</sub> limits – 20µg/m<sup>3</sup> and 10µg/m<sup>3</sup> respectively – are proportionate to the capability of particulate matter to cause harm from both short-term and long-term exposure, and represent levels that have been deemed by the WHO to be achievable in the context of local constraints, capabilities and public health priorities. This fact was acknowledged by the Air Quality Expert Group in Annex 3 to the July 2019 Defra report ‘Assessing the progress towards WHO guideline levels of PM<sub>2.5</sub> in the UK’.

The World Health Organization guideline values take account of background particulate levels and overall achievability, and are therefore already a compromise which recognises the difficulty of addressing human-made pollution whilst acknowledging the presence of some natural sources. Defra’s July 2019 report concluded that it would be challenging but technically feasible to meet the WHO guideline for PM<sub>2.5</sub> in the UK. It is the challenge that must define the action, rather than the inverse; we cannot let our air quality objectives and the toll of air pollution be dictated by inertia or speculative concerns over practicability, especially when we are advised that ambitious targets are achievable.

Courage is needed, and to delay the process of setting a target for PM<sub>2.5</sub> until October 2022, or to settle for anything less ambitious than the WHO guideline values, risks willingly accepting the burden of mortality, the reduced quality of life, and the societal cost imparted by exposure to air pollution, as well as the inequality with which all of these outcomes are experienced.

The ongoing coronavirus crisis has proved a sharp reminder of the importance of respiratory health and the fragility of life, and as such there has never been a more poignant time to take bold action against air pollution.

**We urge you to strengthen the Environment Bill 2019-2021 by enshrining the World Health Organization guideline values for PM<sub>10</sub> and PM<sub>2.5</sub> into law as the UK’s legally-binding air quality targets to be achieved by 2030. By doing so the UK will become the first nation to formally adopt the WHO guidelines, undoubtedly positioning our country as a world-leader on air quality policy.**

I would welcome any opportunity to discuss this matter further.

A handwritten signature in blue ink that reads "A. Harrison". The signature is written in a cursive, flowing style.

Councillor Adam Harrison  
Cabinet Member for a Sustainable Camden