



The Road Haulage Association

Response of the Road Haulage Association to DEFRA

Clean Air Strategy 2018 Consultation

13 August 2018

Summary

1. DEFRA's Clean Air Strategy 2018 consultation shows how they intend to tackle all sources of air pollution with the stated aim of making our air healthier to breathe, protecting nature and boosting the economy.
2. It sets out a wide range of actions on which the UK government is consulting and also shows how devolved administrations intend to make their share of emissions reductions. The consultation will inform the final Clean Air Strategy and detailed National Air Pollution Control Programme, to be published by March 2019.
3. This draft Strategy sets out the comprehensive action that is required from across all parts of government and society to meet the goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources, backed up with enforcement mechanisms.

Background about the RHA

4. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,200 members, operating near to 250,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
5. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
6. We would like to thank the DEFRA, for the consultation and the opportunity to comment on the issues raised.
7. In addition to answering the questions directly we have added further comments on related issues where we feel these are relevant.

Responses to the Questions

Understanding the problem

Q1. What do you think about the actions put forward in the understanding the problem chapter? Please provide evidence in support of your answer if possible.

1. We do not agree with the actions put forward by this consultation and the Understanding the Problem question.
2. Current data indicates that NOx is reducing year on year, the DEFRA statistical release Feb 2018 shows that it reduced by 10% between 2015 and 2016 alone. In 2015 Euro VI engine lorries had only recently been introduced at this stage with approximately 73,000 of them on the road. By the end of 2017 this had doubled to a figure close to 177,000 and we estimate that by the end of 2019 that will have increased to 255,000 - over half of the Heavy Goods Vehicles currently registered.
3. In 2016 NAEI had recorded NOx at 0.89 million tonnes, the revised Gothenburg Protocol requires the UK to reduce nitrogen oxide emissions by 2020 by 55 per cent compared to 2005 emissions at which stage it was recorded at 1.72 million tonnes. If it continues to drop at the base rate of 4.6% per year it will have reached 0.74 million tonnes by the end of 2020 with no further action, easily meeting the targets required by the Gothenburg Protocol.
4. The insistence in introducing Clean Air Zones by various local authorities is not required and is only being used as a taxation on businesses and the community at large.
5. We do not think that sufficient distinction is being made between sources of pollution and causes. For instance, home heating may be the source – but the cause is the way the heating is operated and poor insulation. Heating, transport and other sources are essential, reductions may be best achieved by insulation or reducing congestion. Poor policy decisions will continue if this is not understood.

Q2. How can we improve the accessibility of evidence on air quality, so that it meets the wide-ranging needs of the public, the science community, and other interested parties?

6. We believe that correct data should be communicated to ensure that all parties are aware that reductions arising from current policy and regulation is ensuring we will meet all Gothenburg Protocols by the 2020 deadline.

Protecting the nation's health

Q3. What do you think of the package of actions put forward in the health chapter? Please provide evidence in support of your answer if possible.

7. The RHA support the need for clean air. But, we also believe that over reliance on simplistic charging clean air zones will continue to place road haulage operators under extreme pressure, with many small hauliers having no option but to cease trading.

Q4. How can we improve the way we communicate with the public about poor air quality and what people can do?

8. You can be clearer about how air quality has been improving.

Protecting the environment

Q5. What do you think of the actions put forward in the environment chapter? Please provide evidence in support of your answer if possible.

9. The RHA believe that technology and appropriate standards (national and international) will address this question, investment in the relevant subjects mentioned will have a lasting effect and will ensure the UK protects the environment for the future.

Q6. What further action do you think can be taken to reduce the impact of air pollution on the natural environment? Where possible, please include evidence of the potential effectiveness of suggestions.

10. No comment

Securing clean growth and innovation

Q7. What do you think of the package of actions put forward in the clean growth and innovation chapter? Please provide evidence in support of your answer if possible.

11. The RHA does not believe that the red diesel tax differential should be removed. The use of red diesel for many functions, such as the refrigeration of essential food and medical supplies during transportation, is essential and unavoidable. This tax change does not address the issue of emissions – so it is simply a tax grab.
12. The emission issue is best dealt with through effective standard setting for equipment at national or international levels. The normal equipment replacement cycle can then be used to reduce emissions over time. This will work for industry and improve air quality far more effectively than taxing red diesel.

Q8. In what areas of the air quality industry is there potential for UK leadership?

13. No comment.

Q9. In your view, what are the barriers to the take-up of existing technologies which can help tackle air pollution? How can these barriers be overcome?

14. The take up of cleaner technology for new lorries has been very effective over the 20 years or so. The change to Euro VI has been particularly successful and demonstrates the effectiveness of good quality standard setting at national and international levels. With the right standards, properly enforced, much can be achieved in harmony with equipment replacement cycles.

15. Following a similar approach in other areas will lead to great air quality improvement without undue is dislocating costs to businesses.
16. Current Clean Air Zone charging policies, where retrospective standards are being imposed on people and businesses is the wrong approach. It is punishingly expensive and the financial burdens fall disproportionately on small businesses and poorer members of society. Pay to pollute taxes are wrong.
17. The promotion of retrofit type solutions can be problematic. The road haulage sector demonstrates this as there are no emission retrofit options for lorries or refrigeration units – but we see policy makers making decisions as if they do exist..
18. We understand that retiring old standard equipment may be desirable in some circumstances, but it must be done in a way that is affordable for those directly impacted by the imposition of retrospective standards. This takes time and needs to be phased so the people and businesses can adapt with a reasonable expectation that their investment in equipment will not be destroyed. Current Clean Air Zone policies demonstrate how when this is not done, businesses will be put in peril for very marginal, or even non-existent clean air improvements.

Q10. In your view, are the priorities identified for innovation funding the right ones?

19. No. No provision for the road haulage sector is apparent. What funding that has been available has been given to the Bus sector with no funding for retrofit equipment and testing for road haulage operations.

Action to reduce emissions from transport

Q11. What do you think of the package of actions put forward in the transport chapter? Please provide evidence in support of your answer if possible.

20. The RHA do not believe there is a need for charging clean air zones, DEFRA's own statistics clearly show that emissions are falling and will meet all Gothenburg Protocols by the 2020 deadline.
21. As the take up of Euro VI lorries continues the emissions from Road Transport will reduce through its natural upgrading cycle. Requiring Local Authorities to put in place CAZ's is not the correct action to take. Most LA's have small exceedances and these could be engineered away or be managed by restricted use at certain times of the day.
22. Cutting congestion will reduce any exceedances, as will removing night time restrictions for delivery and more emphasis on localised causes.

Q12. Do you feel that the approaches proposed for reducing emissions from Non-Road Mobile Machinery are appropriate or not? Why?

23. The proposals are not appropriate. Allowing Local Authorities to impose tariffs on NRMM will simply become a tax on the sector, there are thousands of refrigeration units in use. Some new technology is impractically expensive. There is no retrofit option and no funding to test. The sector needs effective national standards and time to allow natural upgrade rather than to impose a tax on something which cannot even be emissions tested.



Action to reduce emissions at home Q13 to Q15

24. No comment

Action to reduce emissions from farming Q16 to Q18

25. No comment, although we see no reason why emissions from farming should be treated in a different way to all other sectors.

Action to reduce emissions from industry Q19 to Q23

26. No comment.

Leadership at all levels (local to international) Q25 to Q29

27. The RHA does not believe that Air Quality should be a devolved issue, it should be central government led, with an emphasis on effective standards agreed across sectors.

Progress against targets

Q30. What do you think of the package of actions in the strategy as a whole?

28. As a whole we think many actions are poorly thought through, impractical and excessively expensive for people and business. It seems like the actions are designed to be as expensive as possible, to the point of being anti-mobility. Data supplied within the consultation document primarily Statistical Release February 2018, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/681445/Emissions_of_air_pollutants_statistical_release_FINALv4.pdf suggests that we will meet the required emissions levels naturally through normal business cycles without taking many drastic and expensive measures such as Clean Air Zones.

Q31. Do you have any specific suggestions? for additional or alternative actions that you think should be considered to achieve our objectives? Please outline briefly, providing evidence of potential effectiveness where possible.

29. No comment.

Q32. If you have any further comments not covered elsewhere, please provide them here.

30. No comment.

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