

Clean Air and the Environment Bill

Adopting World Health Organization guidelines for fine particulate matter air pollution within the Environment Bill

We are urging MPs to support an amendment tabled by Neil Parish MP, which commits the UK to meeting the World Health Organization's ("WHO") guidelines for fine particulate matter (PM_{2.5}) air pollution by 2030 at the latest. A joint [health charity briefing](#), which has already been circulated by members of the Healthy Air Campaign, outlines in detail why a commitment to achieving the WHO's guideline for PM_{2.5} is needed and the benefits that would arise from adopting it into the Environment Bill (the "Bill"). We have also been recently reminded of the very real harm that air pollution inflicts on people and their families, when a coroner ruled that excessive air pollution had contributed to the death of nine-year old Ella Adoo-Kissi-Debrah.

This briefing provides further detail on [the WHO amendment tabled by Neil Parish MP](#) and the appendix answers questions you may have, as well providing examples of why this action so overwhelmingly supported by members of the public.

Amendment 2

In clause 2, page 2, line 20, leave out subsection (2) and insert—

“(2) The PM_{2.5} air quality target must—

(a) be less than or equal to air quality guidelines established by the World Health Organization in 2005;

(b) have an attainment deadline on or before 1 January 2030

Member's explanatory statement

This amendment is intended to set parameters on the face of the Bill to ensure that the PM_{2.5} target will be at least as strict as the 2005 WHO guidelines, with an attainment deadline of 2030 at the latest.

1) Why do we need the amendment?

The UK government has already rightly identified the need to take action in this area to better protect people's health and has said it intends to set strong targets for air quality. As part of this, it has specifically committed to adopting a new binding target for PM_{2.5} through the Bill.

Indeed, in 2019, the then Environment Secretary, Michael Gove said that the Bill should introduce “a *legally binding commitment on particulate matter so that no part of the country exceeds the levels recommended by the WHO.*”

However, as it stands, the Bill does not set a minimum level of ambition or a deadline for its achievement and Defra's target setting process as currently drafted within the Bill would mean that the new PM_{2.5} target would not be set until October 2022. This risks delaying any substantial decisions to tackle this harmful pollutant for almost two years.

The proposed Parish WHO amendment would deliver that strong target whilst sending a clear message that the UK wants to lead the world in efforts to clean up our air.

2) What does the amendment do?

The amendment would kick start action to ensure that all parts of the country meet current WHO guideline levels for PM_{2.5} pollution by 2030 at the latest. The guidelines were agreed in 2005 and recommend an annual mean concentration of no more than 10 micrograms per cubic metre ($\mu\text{g}/\text{m}^3$) to provide a minimum level of protection for people.

In line with the government's approach, rather than setting the actual target on the face of the Bill, the Parish WHO amendment instead sets the minimum parameters for this new target to help speed up its adoption in subsequent secondary legislation.

It thereby puts down a marker for the level of ambition that the Bill will deliver in order to provide a basic minimum standard of protection for all people across the country from one of the most harmful types of air pollutant.

By amending the Bill in this way MPs can ensure that the UK has a world-leading legally binding target for tackling these tiny toxic particles.

3) Why would this help to make the UK a world leader?

The UK already has a legal limit for PM_{2.5}, with which it complies. However, this originates from an EU Directive and is not ambitious enough to adequately protect people's health. In fact, it is 2 times higher than the level recommended by the WHO. Now we have left the EU, we have a major opportunity to set more ambitious targets and better protect UK citizens from harm.

When compared to air quality standards set in other countries outside of the EU, the UK already lags behind in terms of ambition. Our existing annual PM_{2.5} limit value is weaker than the standards applied in other developed countries including the USA, Australia, Sweden, Norway and Switzerland. The government has said it intends to set strong targets, and this amendment would deliver that whilst sending a clear message that we want to lead the world in efforts to clean up our air.

APPENDIX

FAQs on the WHO air quality guidelines and government ambition

Has the UK government not already shown world-leading ambition through its 2019 Clean Air Strategy?

In May 2020, the WHO's Director in Public Health and the Environment, Dr Maria Neira, confirmed that the WHO were supportive of the UK's Clean Air Strategy, but she said that with the Environment Bill the government needs to "*raise the level of ambition*".

Does the WHO intend their guidelines to be legal targets?

The WHO's Director in Public Health and the Environment has confirmed that the guidelines should be the minimum goal for leaders who want to get serious about tackling air pollution.

The WHO also recommends that all governments “*try to move as soon as possible*” to their guidelines, and has stressed that by taking quick and ambitious action leaders “*will be accountable for an important health benefit for [their] citizens*”.

As there is no safe level for pollution, is adopting the WHO guideline for PM_{2.5} too simplistic?

The WHO have said that no threshold has been identified below which no damage to health is observed. However, this amendment does not stop the government from going further or setting other targets to tackle other forms of air pollution, rather, it sets a minimum, evidence-based threshold to drive reductions in air pollution across the country.

Adopting the WHO guideline for PM_{2.5} would guarantee a better level of health protection for everyone including those disproportionately affected by toxic air such as children and older people. The recent inquest into the death of nine year-old Ella Adoo-Kissi-Debrah have put a name and a face to the very real harm that air pollution has - not only on individuals but also on their families. In the inquest, the coroner explicitly highlighted Ella’s exposure to levels of air pollution above WHO guidelines and existing legal limits and concluded that this “excessive” pollution contributed to her death.

The government has proposed a “dual approach” to tackling PM_{2.5} pollution so is this amendment necessary?

We welcome the government’s commitment to also adopting a new exposure reduction target as this would help to drive improvements in areas that may already be below WHO guideline levels. However, this needs to sit alongside an ambitious ambient concentration target that provides a minimum basic level of protection for everybody based on the scientific evidence and within the next decade. A legal framework that drives down average exposure, but allows very high levels of pollution to remain in those areas that are worst affected, would not be a fair one. People should not be condemned to poor health based on where they live, work or study.

Do we need more time to work out the technicalities of this new target?

The UK already monitors and assesses against existing legal limits that set the maximum concentration for PM_{2.5}, and so already has a framework to work within.

In terms of setting a safer concentration for PM_{2.5}, this work has already been done by world experts, including some from the UK, at the WHO. The need for improvements to the monitoring and assessment regimes should not be used as a reason to avoid setting the direction of travel now and start driving much needed action as quickly as possible. The need is urgent and real - according to the British Heart Foundation, around 15 million people in the UK live in areas where average levels of these tiny toxic particles in the air exceed WHO guidelines. Asthma UK and the British Lung Foundation have further identified 8,549 schools and colleges situated in these same areas.

Is it achievable?

In 2019, Defra commissioned technical analysis by leading scientists that concluded that achieving WHO guidelines for PM_{2.5} across the country is technically feasible, and that the measures we’re already committed to could take us 95% of the way to the WHO’s recommendation for what should be the basic level of protection. The Greater London Authority also published further analysis by

King's College London which showed that achieving WHO by 2030 is feasible in what is the most polluted city in the country.

In order to meet the ambition set out in the Conservative manifesto for the Bill to be the “lodestar” by which the Prime Minister himself has said “we will guide our country to a cleaner and greener future”, the government must commit to bold targets to ensure action is taken.

The UK currently complies with the less ambitious existing legal limit for PM_{2.5}, but reductions in this pollutant have stagnated over recent years and particularly since compliance was achieved. More ambitious targets will help drive action to better protect people's health. It is clear that adopting the WHO's guideline for PM_{2.5} will achieve this much needed outcome.

Why this matters to people across the country

“My daughter, Ruby, has a heart condition and although I can't quantify the damage being done to her by air pollution, I worry about her health. She talks about tasting the air pollution on the walk to school where we live in Bath and says she feels sick and tries not to breathe.

“It doesn't seem fair that my children's generation is bearing the brunt of the slow progress in tackling air pollution. I really wish this had been sorted out ten years ago when the law required it so I didn't have to worry about the impact on my children's health. It's not doing their hearts and lungs any good and I'm worried about how their health will be affected in the future.

“I would ask the government to please commit to stronger clean air laws in the Environment Bill for our children's sake. It's such a shame that Bath, which should be a beautiful city to live in, is made so unpleasant and unhealthy by the dirty air. Stronger laws are needed to ensure that effective action is taken to protect my children's health.”

Sally, Bath

“I live in Derby, on a busy rat run between two major roads heading into the city. The poor air quality really concerns me. We have young families living on my street and my grandchildren come and stay. This is not a healthy street to live on. My community desperately needs the government to adopt stronger laws that will drive pollution down to the healthier levels recommended by the World Health Organization.”

Dave, Derby

“We spent a great deal of time last year in King’s College Hospital with our baby son struggling to breathe. There were many other babies in A&E and the children’s ward with the same issue. The doctor thought it was due to high levels of pollution.

“Watching your baby struggle to breathe and in a lot of distress is something parents should not see. Being driven at speed through the night to A&E is not something I will ever forget.

“For the sake of all children, please improve our air quality. We need to see the laws and action to address this public health emergency urgently.”

Laura, London

“I am concerned about the long term impacts of air pollution on my family’s health. The village we live in has, like so many others, seen massive amounts of house building in the last few years with a commensurate increase in traffic and seemingly little consideration to encourage walking or cycling through the new estates that have been created.

“I am concerned about my son’s exposure on his daily bus ride into Maidstone to school, as I know the town has such poor air quality and often, because of a lack of a capacity on the buses, is forced to wait for extended periods on the roadside on the way home for a bus. Maidstone has also been really slow on the uptake with the provision of electric vehicle charging points.

“I think stronger air pollution laws would protect not just me and my family but the whole country, saving NHS resources for other less preventable ailments, which is very important to me.”

Merowyn, Headcorn, Kent

“I am a GP and parent of three young children so I have a professional and personal stake in wanting clean air. I simply feel so angry at work when I see patients with diseases that might have been caused by air pollution that they have no choice but to breathe.

“As a doctor I understand that current legal limits for air pollution are not strong enough to protect people’s health, including that of my family. I would like to see the government adopt the stricter WHO guidelines especially for fine particulate matter which is known to be very harmful to people’s health and commit to meeting these by 2030 at the latest.”

Rebecca, London

"I first became concerned about air pollution during my first pregnancy when I got a surprise high reading from a routine carbon monoxide test at a midwife appointment. As I didn't smoke or have any faulty appliances the midwife suggested it might be because of air pollution.

"I felt so helpless. If I smoked I could have stopped, if the gas boiler was leaking poison I could have fixed it, but how could I protect my unborn child from the very air that I breathe! The more I learned about the life-long problems poor air can cause, the more I realised that I had to make changes in my own life. We chose not to buy a car when our baby was born, and now we walk and cycle everywhere. We avoid main roads and stand back from the kerbside on busy roads. But the most important changes need to be made by the government who could drive more ambitious action by all by introducing stronger legally binding air pollution limits!"

Celeste, London

This briefing is supported by:

