

AQS 10 Royal College of Paediatrics and Child Health

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Bil yr Amgylchedd (Ansawdd Aer a Seinweddau) (Cymru) | The Environment (Air Quality and Soundscapes) (Wales) Bill

Ymateb gan Coleg Brenhinol Pediatreg ac Iechyd Plant | Evidence from Royal College of Paediatrics and Child Health

1. What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?

The RCPCH works to transform child health through knowledge, innovation and expertise. We have over 500 members in Wales, 14,000 across the UK and over 17,000 worldwide. The RCPCH is responsible for training and examining paediatricians. We also advocate on behalf of members, represent their views and draw upon their expertise to inform policy development and the maintenance of professional standards.

We very much welcome the overarching aim of this Bill, which the [Explanatory Memorandum](#) states as being to “bring forward measures that will contribute to improvements in the quality of the air environment in Wales and reduce the impacts of air pollution on human health, biodiversity, the natural environment and our economy”¹.

The health impacts of poor air quality are well known and are described in the Explanatory Memorandum. Our ‘[Outdoor air quality in the UK](#)’ [position statement](#) sets out evidence and describes the impact on children and young people, specifically. Three key points driving our support for legislation to improve air quality are:

- The effects of air pollution can start before birth and are shown to have a greater impact on babies, children and young people. These effects are particularly damaging because they can have a lifelong impact and those with existing health conditions are even more vulnerable.
- Across the UK, the most deprived communities experience the worst air quality, further driving health inequalities.
- Air pollution is a clearly modifiable and avoidable cause of morbidity and mortality and as such, action can and should be taken to reduce or remove this harm².

Our [position statement on Child Health Inequalities](#) further elaborates on the inequalities driving harms associated with poor air quality. It notes that air pollution exposure is highest in the most income deprived areas, and children are disproportionately exposed to the highest levels of pollution³.

For the reasons set out here we hope to see the strongest possible legislative framework for improving air quality to safeguard our children’s health. We would be glad to answer any further questions you may have. Please contact [Lisa Roberts](mailto:lisa.roberts@rcpch.ac.uk) (lisa.roberts@rcpch.ac.uk), Policy and Public Affairs Officer for Wales, in the first instance.

2. What are your views on the Bill’s provisions (set out according to sections below), in particular are they workable and will they deliver the stated policy intention?

¹ Welsh Government (2023). *The Environment (Air Quality and Soundscapes) (Wales) Bill 2023 Explanatory Memorandum incorporating the Regulatory Impact Assessment and Explanatory Notes* p6. Available at: <https://senedd.wales/media/gbhlcgfn/pri-ld15738-em-e.pdf>

² Royal College of Paediatrics and Child Health (2020). *Outdoor air quality in the UK - position statement*. Available at: <https://www.rcpch.ac.uk/resources/outdoor-air-quality-uk-position-statement>

³ Royal College of Paediatrics and Child Health (2022). *Child health inequalities driven by child poverty in the UK - position statement*. Available at: <https://www.rcpch.ac.uk/resources/child-health-inequalities-position-statement>

2.i) National air quality targets (sections 1 to 7)

We welcome the proposals to create a robust target setting framework, informed by independent expert advice and by the WHO. We strongly agree that this should be underpinned by an equally robust compliance monitoring and reporting mechanism.

In our Air Quality position statement, we noted that “More detailed and more widespread monitoring is required to measure each population's exposure to air pollution, particularly in urban areas and near schools... Monitoring needs to advance in line with our understanding of pollutants to provide an accurate picture of risk and inform action.⁴”

2.ii) Promoting awareness about air pollution (section 8)

In our [response to the Welsh Government's White Paper](#) on a Clean Air (Wales) Bill, we highlighted the need to better inform and support health professionals to take local action and provide advice to patients. Health professionals have a duty of care to inform their patients of the dangers of air pollution and how they can better protect themselves from it. We therefore particularly welcome that the delivery plan could improve “the provision of air pollution resources for health professionals and patients⁵”. This could be strengthened to ensure that it is a specific commitment, rather than a possible outcome.

2.iii) National air quality strategy (sections 9 to 11)

2.iv) Air quality regulations (section 12)

2.v) Local air quality management (sections 13 to 15)

The RCPCH supports the expansion of clean air zones in towns and cities and expanding the infrastructure to support active travel, travel by public transport and electric vehicles. This includes ensuring populations living in rural and remote communities also have adequate public transport links. We support giving local authorities the power to close or divert roads when air pollution exceeds set limits.

⁴ RCPCH (2020).

⁵ Welsh Government (2023). See 3.82.