



British Heart Foundation Cymru Petition

Response to Minister's Letter to the Petitions Committee

1. British Heart Foundation Cymru thanks the Minister and her officials for the response to our petition. We would like to take the opportunity to respond to those comments and update the members of the committee on our position to the future policy measures outlined by the Minister for Environment.
2. We were disappointed to note that fine Particulate Matter (PM_{2.5}) was not focused on more in the Minister's response. BHF Cymru is concerned about the focus that has only been placed on NO₂ due to the court cases against the UK and Welsh Governments is not addressing measures which might reduce PM. It is possible that time and money spent on addressing the exceedances of NO₂ without considering tackling PM at the same time may not produce the overall desired improved air quality. It is likely that measures to tackle NO₂ are going to be costly, and it is important that feasibility studies do not take one pollutant in isolation as it is possible this may produce unintended consequences.
3. Since submitting the petition for responses, the COMEAP report into air pollution and cardiovascular disease has been published, showing the real risk posed by fine particulate matter. We would urge the Minister and her officials, and this committee to take note of the conclusions of the report.
<https://www.gov.uk/government/publications/air-pollution-and-cardiovascular-disease-mechanistic-evidence>
4. The report reinforces the need to tackle fine particulate matter with relation to heart and circulatory diseases. "In each of the areas we reviewed we found clear evidence that exposure to air pollutants, primarily fine particulate matter (PM_{2.5}), affected a range of physiological and patho-physiological variables and effects. These included indices of inflammatory and oxidative status, reduced heart rate variability (HRV), arrhythmias, endothelial dysfunction, raised blood pressure, progression of atherosclerotic disease and promotion of thrombosis (blood clotting)." (p.58)
5. We are pleased to hear about the Clean Air Programme and Evidence, Innovation and Improvements project and hope to be able to feed into these with the Minister's officials where appropriate.

Ensuring WHO guidelines are observed by Welsh law

6. We feel that WHO guidelines are the right solution for Wales. The World Health Organization is an important and internationally recognised body which has done extensive modelling and evidence gathering to understand the impacts of polluted air on public health.

7. The EU annual mean limits for PM_{2.5} and PM₁₀ (25µg/m³, 40µg/m³ respectively)¹ are currently double the WHO guidelines for these pollutants (10µg/m³ and 20µg/m³²).
8. It is encouraging to note that the Minister believes that air quality improvement needs to reach beyond compliance with the current EU limits made clear by the court case; BHF Cymru would urge Welsh Government to show their commitment to ensuring better public health by adopting WHO guidelines which are more stringent than EU limits.
9. Whilst we recognise Government's commitment to the goals for wellbeing of future generations, we would urge Government to focus on the evidence which has already been gathered around the world and to ensure that these limits are adopted without delay.
10. The WHO data published in May 2018 for the year 2015 showed that Swansea, Chepstow, Port Talbot and Cardiff were very close to the WHO limits of 20µg/m but none of them were actually in breach of this standard. However for PM_{2.5}, both Chepstow (12µg/m) and Swansea (13µg/m) were in breach of the WHO standard of 10µg/m. Port Talbot (18µg/m, later revised to 10) Cardiff (10µg/m) and Newport (10µg/m) are at the limit. Neither Chepstow or Swansea have been required to undertake a feasibility study into a CAZ, and Swansea has not been required to undertake any work to reduce air pollution because it will be compliant under the EU limits (for NO₂), which is a requirement of the court case against Welsh Government.

Clean Air Zones

11. It is disappointing that the Welsh Government is not willing to take a leading role in directing local authorities to introduce charging clean air zones unless the area is exceeding European limits for NO₂.
12. Unless a national approach is taken, with Government leading the change, local authorities are unlikely to introduce charging clean air zones. When Cardiff Council's recent green paper "*Changing how we move around a growing city*" was published, the national news site Walesonline and its accompanying publication the Western Mail immediately led on the potential of a "congestion charge" which received a lot of public attention and comment which could be dissuasive to a council introducing a charging zone.
<https://www.walesonline.co.uk/news/wales-news/congestion-charge-being-seriously-considered-14442071> (18 March 2018)
13. The Minister's response makes no reference to the importance of *charging* clean air zones. Without introducing a charge for heavy polluting vehicles, it is unlikely that a local authority would be able to make improvements to public

¹ EU Air Quality Standards <http://ec.europa.eu/environment/air/quality/standards.htm> [accessed 18 June 2018]

² World Health Organisation Ambient (outdoor) air quality and health fact sheet (Updated 2 May 2018) <http://www.who.int/mediacentre/factsheets/fs313/en/> [accessed 18 June 2018]

transport, which is the modal shift required to ensure that people can travel effectively without further polluting the air.

14. Furthermore, there is still no mention of particulate matter within the response to clean air zones. Fine Particulate Matter (PM_{2.5}) can be generated by braking and exhaust dust, something which of course would be alleviated enormously by clean air zones.

ULEV funding

15. We welcome the Minister further detailing what the £2 million funding for electric charging points will be used for. This is one point towards an important modal shift towards cleaner transportation.
16. BHF Cymru supports the calls of the Economy, Science and Transport Committee for the Welsh Government to invest £20 per head in active travel options which will help to support this modal shift further.

Air quality monitoring

17. We recognise the Minister's points on the responsibilities of Local Authorities and LAQM monitors, however we feel strongly about the lack of public knowledge regarding where and how they can access the monitoring information.
18. Whilst we recognise that local knowledge is important when it comes to the placing of monitors, it is important to note that without monitoring an area, it is not certain that the air quality is safe.
19. We know from analysis done on air quality monitors, there are times of day when air quality becomes very dangerous for people living with certain conditions. Hafodyrynys Road reaches very unsafe particulate matter levels first thing in the morning. Local information such as this could be provided as a matter of urgency to people living in the area with heart and circulatory conditions.
20. We also know from analysis of air quality monitors that other areas close by to Hafodyrynys and other roads across Wales that they reach similar unsafe levels of air pollution at certain times of day and yet these are not subject to the same scrutiny. It is for this reason, that BHF Cymru urges the Welsh Government to seriously consider how a national approach can be taken to monitor air across the country.

Domestic woodburning

21. BHF recently responded to DEFRA's consultation on cleaner domestic burning of solid fuels and wood.
22. We hope the Welsh Government will bring forward proposals on reducing PM_{2.5} and SO₂ through restrictions on wet wood burning as soon as possible. Whilst we

recognise the Clean Air Programme will build an evidence base, it is clear that UK Government have already moved forward on this issue and it is imperative to use the evidence that is already available to reduce this harmful source of pollution.

23. Given the known health harms attributable to air pollutants, restrictions on the sale of all wet wood and the most polluting solid fuels must be brought into force as soon as possible.
24. A BHF-run focus group held with nine patient representatives from across the UK highlighted that patients did not know enough about the impact of wood burning on both levels of air pollution and heart and circulatory health to know whether it should be tackled. Upon finding out that domestic wood and coal burning constitutes 38% of ambient PM_{2.5} emissions³, there was general agreement that providing more information to the public about the impact of domestic burning was the most important first step. Our panel also noted that people will only change their behaviour if they understand how an issue affects them personally; hence information on the health effects of air pollution must be provided alongside any practical advice.
25. Given the number of homes which are still off-grid in Wales along with a high proportion of fuel poverty, not only information but the ability for people to access alternative fuels must be considered immediately.

We thank the Committee for their consideration of the petition and the Minister for her response.

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³ Department for Environment, Food and Rural Affairs, *Air quality: draft Clean Air Strategy 2018*, May 2018.