

1. BHF Cymru welcomes the opportunity to provide written evidence to the Climate Change, Environment and Rural Affairs Committee to support its inquiry into air quality. BHF Cymru is also an active member of Healthy Air Cymru. Our strong interest in air quality stems from research we have funded that demonstrates a clear link between exposure to poor air quality and heart and circulatory disease. Bold action to tackle a range of pollutants, including particulate matter and nitrogen dioxide is vital to protect the nation's heart and circulatory health.

**What regulatory gaps or issues will need to be addressed after the UK leaves the EU?
How should these be addressed and what will be the main challenges?**

2. The UK currently subscribes to EU restrictions on levels of fine particulate matter (PM2.5). Our research has shed light on how harmful pollutants like PM can enter the bloodstream and cause damage to the heart and circulatory system, increasing the risk of potentially fatal events like a heart attack or stroke¹. According to WHO research, there is no safe threshold for PM2.5 and current EU regulations are not stringent enough to protect our health. Current annual average EU pollution limits are more than twice as high as those of the WHO. In order to protect the heart and circulatory health of current and future generations, the more stringent limits recommended by the WHO should be adopted into Welsh law immediately; and to be flexible to follow future revised limits should additional evidence become available.
3. While the UK is set to leave the EU in January 2021, air pollution will remain a transboundary issue and collaboration with neighbouring countries will continue to be important if we are to protect the health of citizens throughout Wales and the UK. We must therefore ensure we continue to meet, or go further, than the standards outlined at an EU level.
4. UK Environmental Governance will now be overseen by the Office for Environmental Protection at UK level. The Office for Environmental Protection will need proper resource,

¹ British Heart Foundation website, <https://www.bhf.org.uk/information-support/risk-factors/air-pollution/take-action-on-toxic-air-pollution/the-effects-of-air-pollution>, accessed 12 March 2020

independence and authority to ensure proper enforcement of environmental targets. Though this is a UK body, it is important that Welsh Government holds UK Government to account.

Are the Welsh Government's proposals for a Clean Air Act appropriate? How could they be improved? What can be learned from legislative approaches elsewhere?

5. Overall, BHF Cymru support the proposals for a Clean Air Act for Wales and agree that legislative action needs to take place for governmental bodies and the public to accept the graveness of poor air quality to public health. However, as discussed in other questions, some actions and commitments could be improved, and more stringent measures should be enforced. Despite increasing prominence around the public health emergency of air quality, we also believe there could be more sense of urgency with regards to passing and implementing the Clean Air Act. It is of great disappointment that the Government has not taken the opportunity to bring a Bill forward before the end of this Parliament which enshrined WHO limits within Welsh law, with a commitment to bringing forward further measures after the 2021 elections.
6. We welcome the commitment to World Health Organisation air quality guidelines in order to fully protect the health of the public. However, this does not go far enough. The Clean Air Plan's commitments and actions with regards to limits for air pollutants is encouraging to see for the benefit of the health and well-being of people in Wales, but these commitments could be more robust.
7. We are pleased that the Clean Air Plan does recognise the importance of aligning with WHO limits on PM_{2.5} as it proposes: "concentrations across Wales to be below the WHO guideline for PM_{2.5} where it is possible"². It is often deprived areas in Wales which suffer from dangerous levels of air pollution. Therefore, a commitment to only reach WHO guidelines 'where possible' risks widening existing health inequalities in deprived populations most at risk of developing air pollution related illnesses.
8. Furthermore, there is no precise timeline proposed for introducing pollution limits within the Clean Air Plan, except reference to being considered in the short-to-medium term (2021-2026)³⁴. It is essential that WHO limits are introduced at a much earlier date and should be proposed as a legal limit within Welsh law. This commitment should be also accompanied by clear timelines to meet WHO limits by 2030, in line with the WHO's Breath Life campaign.

² Welsh Government, *The Clean Air Plan for Wales, Healthy Air, Healthy Wales*, p.38

³ Brunt, H., Barnes, J., Jones, S., Longhurst, J., Scally, G. and Hayes, E., 2017. "Air pollution, deprivation and health: understanding relationships to add value to local air quality management policy and practice in

⁴ Welsh Government, *The Clean Air Plan for Wales, Healthy Air, Healthy Wales*, p.73

9. The Plan does not currently articulate what success would look like in terms of improvements in health. This should be developed with Public Health Wales against mortality rates attributable to particulate air pollution and other indicators such as the number of adults using active travel.
10. We would also like to draw attention to the function of the independent expert group that will be convened to discuss air pollution limits. It is vital that health experts are included in this group, and that that knowledge of the impact of PM2.5 on human health is considered extensively throughout this process. Furthermore, we understand that economic and social factors are important, but the health benefits of such stricter pollution limits should not be underestimated and will have greater ramifications on the wellbeing of future generations.

What are your views on the regulatory proposals in relation to the Local Air Quality Management regime? What are the main challenges in relation the proposed approach?

11. BHF Cymru welcomes the proposed changes in relation to the LAQM regime, which increase the power of local authorities to monitor, report and act on air pollution. The changes including increasing local authorities' powers over air pollution, incorporating more public engagement, consideration of PM2.5 monitoring, structured time scales for reviewing monitoring capabilities, legislation on implementation of Air Quality Action Plans (AQAPs) are also welcome, however, there are no details provided on how these additional tasks will be costed. Therefore, support and funding to be able to carry out these regulatory proposals is vital.
12. We also encourage the Clean Air Plan's intention of investigating local authorities' capacity to monitor, report and act on levels of PM2.5. Local authorities are currently required to monitor PM10 and nitrogen dioxide NO2 but are only encouraged to monitor PM2.5. Mandating and providing funding for the monitoring of PM2.5 would help identify hot spots with dangerous concentrations and allow AQAPs to directly address the air pollutant which can damage the heart and circulatory system and has also been linked to many other health problems.

What are your views on the regulatory proposals relating to domestic combustion (including fireworks/bonfires), road vehicle idling and Clean Air Zones/Low Emission Zones?

13. We are pleased that the strategy takes a holistic approach to tackling poor air quality, including addressing pollution from domestic wood and coal burning. Studies suggest that particulate matter from wood burning makes an important contribution to (wintertime) PM10 and PM2.5 in densely populated residential areas and that the level of

emissions vary significantly by type of stove and type of fuel. The ban on sales of wet wood is likely to have the biggest impact on domestic combustion and working with UK Government on regulation of the most inefficient stoves must also be a priority.

14. BHF Cymru believes that the Clean Air Plan's stated action regarding assessing the contribution domestic bonfires and fireworks make to PM2.5 emissions is a step forward in understanding the scale of domestic combustion. and if the contributions bonfires, fireworks and other forms of domestic combustion make are substantial to poor air quality, we would like to see the Government take decisive action on regulation.
15. Information on the impact of domestic combustion should be made available to the public, with particular focus on people living with chronic conditions We need everyone to understand the health impacts of domestic burning, so this information should be made available at point of sale of fuels, fireworks and through government sources.

What are the main challenges in introducing a legislative framework for air quality as set out in the consultation document?

16. We don't foresee any challenges to this legislative framework. As we understand it, this legislation would have cross-party support, is vital for the improvement of public health and should be drafted as a priority.