

Environment Act target setting consultation

A guide to responding on clean air

Why is this a crucial moment for clean air?

Everyone has the right to breathe clean air. But across the UK people are being exposed to toxic levels of air pollution.

Air pollution is dangerous to all our health. When we breathe it in it can damage our lungs and from there it is thought it can get into our blood system and travel to other parts of our body.

There are those who are more vulnerable – children, pregnant women, older people and those living with existing health conditions. And there are also those who are more exposed to higher levels of air pollution – people on low incomes, people from ethnic minorities and outdoor and transport workers.

The UK Government is proposing new legal targets to reduce air pollution by 2040. A target that is so far into the future is not good enough and means that another generation of children will be exposed to toxic pollution far above what the world's top health experts think is acceptable. Ministers need to seriously reconsider their proposal.

We need to send a message to the government that we need clean air now – not in 18 years' time. This document has been created to help you respond directly to the [UK Government's official consultation](#) on setting new targets for England under the Environment Act 2021 – and specifically to the air quality section.

Currently the consultation is set to close on the 11th May.

How can I respond to the consultation?

There are two options that you might want to consider to share your views on the UK Government's proposals for new air quality targets:

1. **Use our online consultation tool** (<https://envirotarget.uk/clientearth>) – This is a great way of easily and quickly responding if you only want to answer the questions about air quality targets rather than the other environmental targets in the consultation. Your responses will then be directly submitted to the UK Government; OR
2. **Use the guidance below to directly respond to the consultation** through the [UK Government's official consultation site](#) or via email or letter. This is the way to go if you also want to respond to other aspects of the consultation. However, there is no requirement to answer all the questions included in the consultation questionnaire other than your name and contact details at the beginning of the response form.

What about the target areas?

In addition to air quality, the consultation also includes proposals for new targets for water, waste and nature. You can see the full set of consultation proposals here - <https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/>.

If you would like to respond on the UK Government's proposals for these other target areas then you can see these top lines from our partners at the [Wildlife and Countryside Link](#).

Completing the government's official form – guidance

Key information

- Any responses must be submitted by the 11th May.
- The form can be filled in online at: <https://consult.defra.gov.uk/natural-environment-policy/consultation-on-environmental-targets/>
- Paper copies of the consultation and supporting documents can be requested by:
 - emailing environmentaltargets@defra.gov.uk; OR
 - Writing to: Environmental targets consultation, Consultation Coordinator, Second floor, Foss House, Kings Pool, 1 to 2 Peasholme Green, York YO1 7PX.
- You can also email or post your response to the above email and postal address, making sure you include your name, email address, organisation (if applicable) and whether you would like your response to be confidential (if yes, with your reasons).

The following tips are for completing the online form but can also be used if you are submitting your response by post or email.

Consultation form summary

- Pages 1-3: overview of the consultation itself and links to more information.
- **Page 3:** Questions 1-5 request your name, email, organisation (if applicable) and whether you would like your response to be confidential and must be completed to proceed with the online consultation.
- Pages 4-20: Questions 6-20 focus on other targets to be set in England under the Environment Act 2021. You do not need to answer these questions if you only want to focus on the air quality targets.
- **Page 21:** Questions 45-48 cover the target proposals for air quality – please respond to these questions, using the guidance notes below.
- **Page 26:** click to submit your response.

Suggested responses to air quality questions

Question 45. Do you agree or disagree with the level of ambition proposed for a PM_{2.5} concentration target?

- **We recommend that you select answer B: I DISAGREE** with the proposed PM_{2.5} concentration target.

Explanation

Fine particulate matter (PM_{2.5}) is a group of pollutants made up of very small particles produced by natural and human sources, including dust, vehicle emissions, road and tyre wear, wood burners, industry and agriculture. These particles can be less than a twentieth of the width of a human hair and can't be seen with the naked eye but when breathed in they can get deep into the lungs and into the bloodstream. PM_{2.5} is one of the most dangerous pollutants for human health and, according to the World Health Organization (WHO), there is no safe level of this to breathe in.

The UK Government wants to set a target of 10 µg/m³ (micrograms per cubic metre) to be met across England by 2040. This proposed target does not deliver the change we need quickly enough. We should not have to wait 18 years for safer targets, leaving another generation to breathe dirty air.

Instead, we need to be meeting this target by 2030 at the latest, not 2040. Analysis by [Imperial College London](#) and [King's College London](#) has shown that this is possible.

Question 46. [If disagree] What reasons can you provide for why the government should consider a different level of ambition for a PM_{2.5} concentration target?

Please submit your own answer in your own words in the answer box for this question. You don't have to be an expert so feel free to express your individual concerns. Below are some points to help you think about this.

- **Reasons you might disagree:**
 - You or someone you know may experience health issues related to air pollution.

- You could have concerns over the impact this delay would have on children growing up around harmful levels of air pollution.
 - You may have a relative who is living with a lung condition and struggles to breathe when leaving the house.
 - Research has shown that we can reach the suggested target of 10 µg/m³ by 2030. Setting this target at 2040 therefore makes no sense.
 - We need to reduce air pollution levels as quickly as possible. It is linked to 36,000 deaths per year and costs the NHS up to £20bn.
- **What should the UK Government do?**
 - The UK Government should set the deadline for reaching 10 µg/m³ by 2030 at the latest.
 - By ensuring we meet this target by 2030 at the latest we will have the opportunity to further reduce levels of air pollution at a later date. This is vital to protect public health and make our villages, towns and cities better places to live.
 - Achieving this target by 2030, rather than 2040, would see an average of 388,000 fewer days of asthma symptoms flare ups a year in children; a fall in cases of coronary heart disease of over 3,000 cases per year, and a rise in average life expectancy of 9-10 weeks across those born in 2018.
 - The total economic benefits of reaching this target by 2030, could be worth up to more than £3bn per year.

Question 47. Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

- **We recommend that you select answer B: I DISAGREE** with the level of ambition proposed for the population exposure reduction target.

Explanation

The UK Government is proposing to set a ‘Population Exposure Reduction Target’ that will see a 35% reduction in population exposure by 2040 (compared to a base year of 2018). Simply put, this proposal means that by 2040 a set of selected monitoring sites across the country will be, on average, 35% less polluted than they were in 2018.

Even if achieved, this proposed target runs the risk of allowing air pollution hotspots to remain far too high in some areas whilst others that already enjoy cleaner air could become less polluted still.

We don’t think this is fair, and risks people being left behind, often in the most disadvantaged communities. This target needs improving and would only be helpful alongside the more ambitious concentration reduction target we are calling for in questions 45 and 46.

Question 48. [If disagree] What reasons can you provide for why the government should consider a different level of ambition?

Please submit your own answer in your own words in the answer box for this question. You don't have to be an expert so feel free to express your individual concerns. Below are some points to help you think about this.

- **Reasons you might disagree:**
 - This target risks doing nothing to protect you or your children from the fumes from highly polluted roads near your home, schools or work during busy periods when air pollution is at its peak.
 - On its own, this kind of target could allow dangerous pollution hotspots to remain in some areas whilst others enjoy cleaner air. This target could only be fair alongside a reduction in overall PM_{2.5} that meets World Health Organization recommendations as soon as possible.
 - We also do not currently have enough monitors to understand how air pollution is reducing within each village, town or city. To make sure that this exposure reduction target is effective, we need to see a major increase in air pollution monitoring and a continued use of modelling as it would be difficult to have a robust monitor on every street.

Finally, don't forget to go to page 26 to submit your response!

If you have any questions about this then please get in touch with:

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