



Bus Users UK response to Department of Environment, Food and Rural Affairs: Consultation on Environmental Targets

30 May 2022

Introduction

Bus and coach users spend a significant amount of time alongside busy roads, exposed to the pollutants caused by vehicle emissions and particulate matter. They also represent a disproportionate number of younger and older people, as well as people with pre-existing health conditions which could be exacerbated by pollution. In London alone, the Mayor has published data which puts the number of early deaths due to exposure to particulate matter at 4,300. This needs urgent action.

If Net Zero is to be achieved and air quality improved, it is paramount that we move people away from private cars and onto public, shared and active travel.

The consultation proposes two targets for air pollution:

- The concentration of fine particulate matter (PM2.5) pollution of 10 micrograms per cubic metre will be met by 2040 – this is equivalent to the old 2005 World Health Organisation guideline for PM2.5.
- A 35% reduction in population exposure to PM2.5 by 2040 (compared to a base year of 2018).

The UK was in breach of binding limits set for major air pollutants under the Ambient Air Quality Directive (2008/50/EC), such as larger particulate matter (PM10) and nitrogen dioxide – the reason for introducing most Air Quality Management Areas across the UK.

In order to protect people at the kerbside, the Government's ambition should be higher than stated as the current targets are a "business-as-usual" expectation. Following the increased commitments of COP26 to set a world-leading example on climate change initiatives, the UK Government should bring forward the deadline for reaching 10µg/m³ to 2030 at the latest and commit to a high level of transparent pollution monitoring and modelling.

There should also be clear targets for each mode of transport to identify what progress is being made in each area and where more work and/or support is required.

Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

We disagree with the proposed PM2.5 concentration target as action to reduce particulate matter pollution will be delayed unnecessarily. In 2021, WHO updated its [Global Air Quality Guidelines \(AQGs\)](#), recommending that the concentration limit for PM2.5 should be halved from 10 to 5 micrograms per cubic metre of air (mcg/m³). According to a study from the Clean Air Fund and Imperial College London it is possible for the UK to reach the proposed level of air pollution by 2030, not 2040ⁱ. This would have substantial impacts on child and adult health, especially in terms of reductions in asthma and coronary heart disease as well as increasing average life expectancy of those born in recent yearsⁱⁱ. As there is no safe level of particulate matter, the UK Government should set the deadline for reaching 10µg/m³ to 2030 with a long-term target of 5µg/m³ by 2040.

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

The approach to pollution monitoring currently is patchy. These proposals only aim to reduce the amount of pollution monitored in 2040 by the Automatic Urban and Rural Network to “on average, 35% less polluted than in 2018”. This does nothing to address pollution hotspots (eg outside homes, schools and workplaces) unless they are close to a monitoring station. There need to be many more monitoring sites to build a picture of the reduction of pollution in different communities - urban, rural and everywhere in between.

We are calling for a much more ambitious exposure reduction target alongside a major enhancement of the air pollution monitoring system, including all major transport hubs and bus/coach stations.

About Bus Users

Bus Users campaigns for inclusive, accessible transport. We are the only approved Alternative Dispute Resolution Body for the bus and coach industry and the designated body for handling complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of a Sustainable Transport Alliance of organisations working to promote the benefits of public, shared and active travel.

Alongside our complaints work we investigate and monitor services and work with operators and transport providers to improve services for everyone. We run events, carry out research, respond to consultations, speak at government select committees and take part in industry events to make sure the voice of the passenger is heard.

Bus Users UK Charitable Trust Ltd is a registered charity (1178677 and SC049144) and a Company Limited by Guarantee (04635458).

ⁱ [Pathway to WHO: achieving clean air in the UK | Faculty of Medicine | Imperial College London](#)

ⁱⁱ [Air quality in UK could reach WHO targets by 2030 if reforms delivered - AirQualityNews](#)