5 January 2018

Dear Lord Trefgarne,

Letter of support for the Environmental Permitting (England and Wales) (Amendment) Regulations 2018

We are writing on behalf of the Royal College of Physicians (RCP) in support of the above regulations. Air pollution is the largest environmental cause of disease and premature death in the world today. The damaging health effects of air pollution have been well documented. Diseases caused by pollution were responsible for an estimated 9 million premature deaths in 2015. Evidence from RCP’s report ‘Every breath we take: the lifelong impact of air pollution’ demonstrates that an estimated 40,000 deaths are brought forward by air pollution across the UK every year.

Our report also outlines that the damaging effects of air pollution occur across the life course and can begin at conception. Exposure to air pollution in infancy can damage the lungs, and increase the risk of lung infections that may be fatal. Air pollution is also linked to reduced lung function and lung cancer in adulthood and the development of new onset asthma as well as exacerbating asthma in those who already live with the condition. Air pollution is also an issue of health inequality. The most vulnerable groups – namely people living in deprived areas, children, older people living with chronic long-term conditions – suffer the most harm. Most importantly, there is no level of air pollution that is safe with multiple organs being affected.

Given the weight of scientific evidence on the damaging health effects of air pollution across our lifetime, the RCP supports efforts to control emissions from medium combustion plants and generators, particularly as these are used in hospitals and other healthcare settings. Many of these generators operate on diesel and emit high levels of nitrogen oxides and greenhouse gases.

An increase in the use of generators has been identified as a source of an avoidable increase in emissions of nitrogen oxides. As their use contributes to local concentrations of nitrogen oxides, domestic regulatory action is needed. The NHS is one of the largest employers in Europe,
contributing 9.1% of the UK’s gross domestic product (GDP). It is also one of the largest contributors to greenhouse gas emissions in the UK. We strongly believe that the health service must no longer be a major polluter; it must lead by example and set the benchmark for clean air and safe workplaces. In turn, this action will reduce the burden of air-pollution-related illness on the NHS.

The RCP has very recently been forced to use a diesel generator ourselves as this is easier to source than other more environmentally and health friendly sources of fuel. We were staggered to discover the negative effect this will have on air pollution locally to us and believe that most doctors and members of the public are unaware of the issues being raised.

We welcome the steady progress that has been made in reducing levels of air pollution particularly in emissions of NOx from road transport. However, further action is now needed to tackle pollution from other sources, including diesel generators that are most frequently sighted in urban settings close to housing, offices, schools and hospitals where the most vulnerable are exposed to their toxic emissions. These regulations will be vital to improving air quality and protecting people’s health. The RCP strongly encourages the collection of data regarding the use of diesel generators, particularly in healthcare settings such as hospitals.

If you have any questions regarding RCP’s position or require further information, please do not hesitate to contact Methela Haque, RCP’s Senior Public Affairs Adviser on Methela.haque@rcplondon.ac.uk

Yours sincerely,

Dr Andrew Goddard MD FRCP
Registrar

Professor Stephen Holgate CBE FRCP
RCP Special adviser on air quality

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1 The Lancet Commission on pollution and public health.