Freight Transport Association

The Freight Transport Association (FTA) is one of Britain’s largest trade associations, and uniquely provides a voice for the whole of the UK’s logistics sector. Its role, on behalf of over 16,000 members, is to enhance the safety, efficiency and sustainability of freight movement across the supply chain, regardless of transport mode. FTA members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight. FTA works with its members to influence transport policy and decisions taken at local, national and European level to ensure they recognise the needs of industry’s supply chains.

Introduction – Air Quality and Freight

FTA’s mission is to make logistics safer, cleaner and more efficient. We seek to ensure that our members can supply our towns and cities with the goods they require every day, whilst reducing any social impacts – including air pollution. As information about the health impacts of some atmospheric pollutants has grown, the issue of reducing local air quality emissions has risen in its importance. The logistics industry accepts that emissions need to reduce compared to their historic levels.

We would draw attention to the progress that has been made in making new diesel vehicles significantly cleaner than their recent predecessors, and look forward to the substantial improvement in air quality this will bring.

Air quality is improving. It has been for decades. Too often the public is misled into believing that air quality is getting worse when it is not. The public policy challenge before us is how to accelerate the positive change that is coming anyway. This is the correct context in which to judge potential actions.

The success of the Euro VI standard for heavy duty vehicles (lorries and buses) must be acknowledged, lessons learned for the upcoming reform of the testing standards for light duty vehicles (van, cars, etc). Again this fact should be borne in mind in all policy formulation – further radical changes for Heavy Goods Vehicles (HGVs) are not required in order to massivly improve air quality beyond where it is today.

Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution?

In principle FTA believes there is too much focus on Low Emission Zones. Any policy that pre-selects or prioritises one method for achieving change, risks selecting a less-than-best approach. The objectives should be outcome
oriented. Therefore, the plan should identified realistic targets for accelerated air quality improvements and then allow local authorities the freedom to determine, on an open and even basis, what actions might best deliver those.

The current approach priorities and pre-selects LEZs as the solution – there is no need for this. If an LEZ is the best answer, an open policy approach would still deliver this outcome.

There is a lack of support for the logistics industry to upgrade vehicles more quickly. The main step currently required is to get all lorries and vans to the Euro VI or 6 standard as quickly as possible. If Scotland wants air quality to improve faster it needs to offer support or encouragement to operators – especially small and medium sized enterprises (SMEs).

Are the policies sufficiently ambitious?

Clearly there is no limit of the amount to which we wish to improve human health. In the long run, vehicles should be zero emission from the tail pipe and have minimised emissions from other sources such as brakes and tyres. However, especially for commercial vehicles such as lorries and vans, this is still some way off.

The short-term ambitions in the Plan are in excess of UK and EU requirements and will make Scotland’s cities some of the cleanest modern cities in the world. Further accelerating change (unless it is done with significant support to industry, see above) could massively cost industry – especially SMEs – as well as private motorists from the lower income brackets. Therefore the ambitions should not be accelerated.

Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?

Alternative fuels for commercial vehicles are not yet operational and commercially viable. Many good programmes from industry and Scottish and UK government are working to bring forward the time at which they will be an option for the mass market.

As noted above, the most significant improvement in air quality relating to commercial vehicles in the next few years will instead come from the upgrade to Euro VI/6. There is currently no support for this, however given that the Euro standard is a regulatory requirement for new vehicles normal market turnover will cause a significant upgrade by the early 2020s any way.

Are there conflicts in policies or barriers to successful delivery of the air quality objectives?

Cost, to local authorities, local businesses and indeed local residents, is the primary barrier to measures that will improve air quality. However as natural fleet turnover removes older vehicles from use, costs of compliance with LEZs would fall rapidly in the years ahead. At the same time however the point of regulations such as LEZs will reduce as the same fleet turnover will mean they are achieving less.
How does the Scottish policy fit with the UK and EU policy on air quality?

Scotland’s targets are more ambitious than those of the rest of UK and as such, if delivered, will deliver compliance for UK in respect of EU obligations.

Are the powers and resources of Local Authorities and SEPA to address air pollution adequate?

This currently is a pivotal question in respect of the Low Emission Zone (LEZ) commitment. As an external stakeholder FTA has observed that there are concerns over funding and other necessary resources for their delivery. What is important to the freight sector in this regard is that there should be uniform implementation at a practical as well as a legislative level of these requirements across Scotland.

Is Scotland on target to have a pilot low emission zone (LEZ) in place by 2018 and should there be more than one LEZ pilot?

FTA is engaged with Transport Scotland on its National Low Emissions Framework (NLEF) Low Emission Zone (LEZ) Steering Group. The stated ambition in the programme for Government to introduce a LEZ in one of Scotland’s four major cities by 2018 is certainly ambitious and a year in advance of any equivalent such plans in England, or, as far as we are aware, anywhere in the world (for a Euro VI LEZ).

Transport Scotland is engaging with FTA and its members in workshops to address the impact on the freight and logistics sector of the implementation of these proposals. What is going to be key will be not to incorporate commercial vehicles in the first phase. 2018 will be only four years after Euro VI became compulsory for HGVs which means there will be a limited second market in compliant vehicles. Operators whose business model is based on using second hand vehicles are predominantly SMEs. Incorporating lorries at this time could therefore exclude large numbers of small Scottish businesses from their local markets. The situation is even worse for vans – there will be only two years’ worth of compliant vehicles in the fleet and therefore no notable second hand market at all.

Again, FTA is opposed to this focus on LEZs. They are not a magic solution with merits above all others. Scotland’s issues will not be solved the day one or two LEZs are introduced. And other policy mechanisms might be more effective in improving air quality. The level of focus on introducing an LEZ of some sort within 2018 appears a narrow and blinkered policy approach.

How should the improvement of air quality be prioritised in areas where there have been persistent breaches of NO2 limit values?

It is important that from a transport emissions perspective that schemes for LEZs in specific locations focus upon what will deliver the best air quality outcome. This means prioritising improvements in vehicles where the best results will be achieved. So buses, coaches, taxis and private hire vehicles, and private cars must be considered too as well as freight vehicles. What is key is to be driven by policies
on LEZs for different categories of vehicles that will deliver the best outputs in terms of air quality whilst minimising the costs to society.

**Is adequate consideration given to air pollution from agriculture?**

FTA would make the general point that emissions from sectors other than transport must be considered in this work – all sources must be addressed if we are to improve air by the maximum amount.

**Conclusions**

Scotland’s supply chains service its economy and help it compete in wider UK, European and global markets too. It is vital that Air Quality policies in Scotland recognise this and support the work of the freight and logistics sector in its key role of delivering an efficient and competitive supply chain for Scotland that assists Scottish economic development and individual living standards.