Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from UNISON

Introduction

UNISON is Scotland’s largest trade union with members across the public, private and voluntary sectors. We have members working in local government and in the Scottish Environment Protection Agency (SEPA) who have specific responsibilities relating to air quality. Many UNISON members working in the NHS have to deal with the wide-ranging health consequences of air pollution – pollution described by the World Health Organisation (WHO) as a global public health emergency. And many of our members suffer from poor air quality in and around their own homes and workplaces.

We welcome the Environment, Climate Change and Land Reform Committee’s inquiry into air quality in Scotland.

We concentrate our response on the fact that the transport sector is a key source of air pollution. Addressing this has proved challenging to date, yet action is required urgently. Finding the right mix of policy initiatives on transport will have win, win, win, effects for health, air quality and tackling climate change. UNISON urges the Committee to prioritise fairness and reducing inequalities in its recommendations. Policy proposals should ensure that action is taken in particular consideration of those most affected by and vulnerable to air pollution – while recognising that we are all exposed, including babies in the womb. We call for sufficient planning for support to be in place (e.g. greatly improved public transport) prior to implementation of changes. This includes support for those with limited transport options, for reasons such as: realistic access to public transport at all times of day; recognition of the low incomes of many of those affected; recognition of the essential car user role in many posts: arrangements in place for those working early/late shifts, people with disabilities etc. A Just Transition approach, in summary.

Overview

Air quality represents the greatest environmental threat to human health and currently commands significant domestic and international interest. Graeme Dey MSP, Committee Convener, in launching the inquiry last month, said that air pollution could be contributing to 15,000 early deaths in Scotland a year. Exposure to air pollution affects us all. The top three Scottish streets most polluted with nitrogen dioxide (NO2) in 2016 were Hope Street in Glasgow, St John's Road in Edinburgh and Wellington Road in Aberdeen. The remaining six in the top nine were in Dundee, Cambuslang, Aberdeen, Edinburgh, Glasgow and Perth. The Scottish Parliament Information Centre (SPICE) 2016 briefing on air quality in Scotland points out that the economic costs are accumulated in health care, loss of workdays through sick leave, rehabilitation of the environment and damaged buildings, and reductions in crop yield. Friends of the Earth Scotland said that there is a billion pound cost to the economy, with traffic in urban areas by far the largest source of air
pollution, whereas fifty years ago, pollution was mainly from factories vi. Clearly there have been improvements since those days, but a particular problem now is diesel emissions vii. Our sister union Unite is taking action vii on the health threat from diesel with a register to record exposure to excessive diesel fumes, noting worrying complaints of short-term health concerns including: wheezing, other respiratory problems, eye irritation, lightheadedness, chest tightness, headache, nausea and heartburn. Long term problems included: effects on lung capacity, breathlessness, asthma, being more prone to colds and flu and sinusitis.

The sources of air pollution are distributed across many sectors, including transport, agriculture and energy industries, but transport is the key area.

Elevated pollution levels, usually located in urban areas with high volumes of road traffic, have been associated with a number of health issues, including heart disease and lung cancer. Worst affected are the young, elderly and people who already have heart and lung conditions. Professor David Newby, of Edinburgh University, told the Committee in May viii: “We have found that people who come in with heart attacks are three times more likely to have spent the previous few hours in busy traffic before they had the heart attack. So there is an association with the triggering of heart attacks. There is also an association with long-term exposure, which makes it more likely that people will have heart attacks and strokes.” He said similar associations were found with respiratory disease. The British Heart Foundation says that people with a heart problem or chronic lung disease are advised to exercise, but when air pollution is ‘very high’, they should avoid going outside for long periods or undertaking strenuous exercise.

It is clear why air pollution is described as a public health emergency and we welcome the challenge by environment lawyers’ charity ClientEarth that saw the UK Government defeated over their inadequate plans, including for Scotland, to address illegal levels of nitrogen dioxide (NO2) pollution. Air quality is devolved to Scotland and the Scottish Government said it had tried to influence the UK Government plans. ClientEarth said the draft plans for Scotland, Wales and Northern Ireland are “simply plans for more plans.” ClientEarth said on current projections Glasgow will have illegal levels of NO2 until 2024, with Aberdeen and Edinburgh doing so until 2020 ix.

The Scottish Government published a strategy for tackling air pollution in Scotland in 2015 – “Cleaner Air for Scotland: the road to a healthier future” x which sets targets for Scotland. Since this was launched the EU introduced a new directive to reduce air pollution. Environment Cabinet Secretary Roseanna Cunningham recognised, in the June 2017 Progress Report xi, that much more needs to be done. Yet the Scottish Government has failed to review its strategy following the High Court ruling. This is unacceptable.

UNISON below sets out some of the specific proposals for traffic demand management that we believe should be considered. We stress that we have always argued that any proposals that affect workers, such as workplace parking levies, must take account of the fact many jobs, for example health visitors, mean staff are essential car users. This can apply also to home care workers and many others in low paid posts. Restrictions on parking also need to take account of whether people
have access to suitable public transport, not just a problem in rural areas, but for example at major hospitals, where staff work shifts that can start very early or finish very late, when bus or train travel options are limited or non-existent. Such changes should only be introduced through fair green travel to work plans negotiated with recognised trade unions.

As members of the Stop Climate Chaos Scotland (SCCS) coalition, we are calling for the new Climate Change Bill to bring an end to the sale of new petrol and diesel vehicles by 2030\textsuperscript{xii}. SCCS argues: “Ending the sale of new fossil fuel cars by 2030, supported by measures such as Low Emission Zones, Workplace Parking Levies, better public transport, active cycling and infrastructure for electric vehicles would reduce emissions, tackle air pollution and improve public health.” The coalition also calls for 10\% of the transport budget to be spent on active travel, supporting cycling and walking.

**Policies to support active travel**

A vision of cleaner air, of many more people walking or cycling, for work and for leisure, of largely car-free city centres, with reductions in obesity, in heart and lung diseases and with increased quality of life for all is not something that is impossible to achieve. But it takes planning, action by government and local government to enable and assist a modal shift to active travel as soon as feasible and to insist on and assist industry compliance with reducing air pollution.

Some of UNISON’s policies to address this are beyond the remit of the Committee, but we believe Committee members should be calling for policies including the renationalisation of rail and bus re-regulation. Our 2016 Scottish Parliament election manifesto\textsuperscript{xiii} included calls for a more integrated public transport system to make a meaningful shift away from car use. Re-regulating buses and more public and community ownership would be helpful in doing this. In addition, we advocate green travel plans at work, with incentives for lower energy transport, cycling, car-share, public transport, walking and the use of lower emissions vehicles. We oppose the Scottish Government’s cuts to Air Departure Tax\textsuperscript{xiv}.

**Low Emission Zone (LEZ)**

The Scottish Government plans to establish a Low Emission Zone by the end of 2018, with Aberdeen, Glasgow and Edinburgh all wanting to be the first. LEZs restrict entry to cars and other vehicles with certain emission standards. London’s LEZ is applied to heavy goods vehicles and larger minibuses, with charges of up to £200 for those not meeting the standards, and fines of up to £1,000. The Scottish LEZ would initially cover buses, lorries and large vans. However, the lack of detailed information on preparation for this is concerning. We want to see work begin immediately to bring levels down to legal limits as soon as possible across all of Scotland.

We will always stand up for our members’ interests and some transport demand management policies may involve considerable changes for our members. But we also recognise and prioritise the crucial health and safety issues involved – issues
around air pollution and the impacts of climate change, the importance of cleaner, safer streets, healthier lifestyles and the welcome impact on wellbeing and overall health, including mental health. We believe the impact of the smoking ban is an example to use, in the ways that this has had wide ranging benefits, not just for reducing lung cancer rates.

Economic impacts can be and should be managed, along Just Transition principles. The importance of wider policies than dealt with here cannot be stressed enough and the Committee should take these on board, including arguing for massive improvements to public transport before implementation of demand management measures. Without real alternatives to cars, such changes would have too negative an impact on those who have no other, or few other realistic options. We also need infrastructure spending to provide safe cycling and walking routes. Many, if not most, of these actions need to come before strong disincentives to car use are put in place.

**Our proposals**

UNISON proposes that the Scottish Government establishes a working group involving trade unions to develop guidelines for ensuring that traffic demand management proposals are fair and equitable, negotiated with recognised trade unions, and align with Just Transition and Fair Work principles. This will be important both for air quality initiatives and for active travel/climate change policies. It can be separate from, but linked with, or run by the proposed Just Transition Commission. It should examine best practice from a range of international examples, e.g. European cities that achieved strong shifts to active travel and cleaner transport. It should produce guidance for policy development and implementation.

We support, **as part of fair green workplace/travel to work plans negotiated with recognised trade unions**, the use of:

Greater use of public transport for work including active travel plans with employer support for cycling, walking.

Workplace parking levies.

Replacing the current 30mph default speed limit on restricted roads with a 20mph limit.

We are willing to support the types of measures below, providing there is sufficient investment in ensuring that all affected have a genuine choice/option of low cost public transport that is available in a realistic timetable for those on 24/7 shift work and that recognises for a range of workers that cars are the only option – for example, social workers transporting children and similar essential car users.):

Traffic management schemes that reduce vehicle access to parts of towns and cities,

Phased reduction of parking spaces and increased charges.

Congestion charging that puts extra costs on driving polluting vehicles, i.e. LEZs.
Electric pool cars and incentives for staff using their own vehicles to buy lower polluting cars.

Conclusion

Scotland was the first country in Europe to adopt the WHO recommended limit for PM 2.5 in April 2016. We should continue the level of ambition with policies that will deliver health and climate outcomes that benefit everyone, with policies for transport demand management based on Fair Work and Just Transition principles. Toxic, illegal air pollution is a public health emergency and requires much more urgent and ambitious action than the Scottish Government’s current approach. Work must begin immediately to bring levels down to legal limits as soon as possible across all of Scotland.

UNISON Scotland
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1 http://apps.who.int/iris/bitstream/10665/250141/1/9789241511353-eng.pdf?ua=1
4 http://unfccc.int/resource/docs/2016/tp/07.pdf
5 http://www.foe-scotland.org.uk/most-polluted-streets
7 http://www.foe-scotland.org.uk/air-pollution-inquiry-launch
12 http://www.scottishairquality.co.uk/air-quality/CAFS
13 http://www.gov.scot/Publications/2017/06/2881
16 http://unisondave.blogspot.co.uk/2016/12/cutting-air-passenger-duty-is-wrong.html