Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from Mineral Products Association Scotland

The Mineral Products Association Scotland (MPAS) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. Our membership is made up of independent SME quarrying companies as well as major international and global companies. Membership throughout the UK covers 100% of cement production, 90% of aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the economy and is the largest supplier to the construction industry, which has an annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

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

We note that the focus of CAFS is tackling air pollution in towns and cities, especially with regards to emissions from vehicles. We are concerned that logistically, for companies operating fleets nationally, that it may become difficult to operate across different areas with different air quality management regimes. As such, a key principle must be consistency between the measures introduced to tackle local air pollution, as directed through CAFS.

The wider adoption of HGVs with EURO VI engines as fleets are replaced will have a significantly positive impact on local air quality and measures to encourage the use of such vehicles could be implemented. However, at a strategic level, there is a need to recognise that the supply of HGVs to meet the demands of the mineral products sectors will be constrained by the ability of body-work/coach-builders to customise vehicles (such as ready-mix trucks, aggregate lorries).

CAFS is correct to focus on vehicle emissions as the significant source of urban air pollution and properly identifies that efforts by industry to reduce emissions have resulted in substantial air quality improvements in recent decades.

• If measures to reduce emissions from stationary installations are considered at a national or local level, they must be technically feasible, ensuring that emissions reductions are achievable without excessive cost. MPA Members have already made significant investments, over decades, to reduce emissions to air. Further emissions reductions may be difficult to achieve because, for example:
  • There are no technical options for further emissions reductions;
  • There is no space to install abatement equipment;
  • The cost of emissions reduction far outweighs the value of any air quality benefit achievable from the reduction; and
  • The trajectory for emissions reduction is not aligned to investment cycles.
MPAS also note that provision for suitable low emission transport such as rail and water freight must be maintained and protected to enable these options to continue to support emissions reduction.

**How does the Scottish policy fit with the UK and EU policy on air quality?**

No comment

**Are the policies sufficiently ambitious?**

No comment

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

The introduction of local clean air measures must be proactively consulted over a long enough period to engage all stakeholders, and be implemented with sufficient notice.

In all instances, the implementation of local clean air measures needs to avoid measures that create new (direct and indirect) burdens on local business that are disproportionate to the measure’s potential contribution to improving local air quality. Preference should be given to infrastructure improvements and incentive measures rather than penalties (e.g. charging schemes).

Local measures to address air quality must:

- Respect time-sensitive processes – Mineral products are often time-sensitive deliveries to urban centres, for example, ready mixed concrete deliveries to construction sites. Local air quality measures need to recognise that some traffic by heavy goods vehicles throughout the day will be necessary and these deliveries to construction sites are beneficial to the local economy, housing supply and infrastructure improvements.
- Work in parallel with other permit requirements – For example, planning requirements on an installation may prohibit vehicle movements at the only times when they are allowed by new air quality measures, or may only leave a narrow window for vehicle movements without additional cost. Alternatively, a business may have a ‘Noise Management Plan’ agreed with the national regulator as part of its environmental permit requirements, which will be in conflict with the requirements of local air quality measures. Business will expect ‘joined-up’ thinking within Local Authorities, and account to be taken of the backdrop of national regulation to which businesses already comply.
- Accommodate national or local legislation, policies or initiatives – For example, exemptions from local air quality restrictions should be available for infrastructure projects designed to tackle air quality issues.
- Work with other transport related policies - For example, policies related to road safety. The construction industry and supply chain, including public and private sector clients, contractors and builders and material suppliers and haulage operators, is implementing the Construction Logistics and Community Safety standard (CLOCS) in order to reduce the number of vulnerable road users such
as pedestrians and cyclists injured in collisions with construction vehicles. It is essential that air quality measures are not introduced which might conflict or have unintended consequences in relation to other policies, for example related to improving road safety or reducing carbon emissions.

• Be cost effective for local businesses – If there are additional costs to businesses from local air quality measures this may, over time, lead to a counter-intuitive situation where businesses move out of these areas to remain cost competitive, and as a result, the local market is supplied with goods that have travelled a larger distance, and where the supplier charges a premium to cover the cost of, for example, meeting vehicle emissions standards for entering charging zones.

• Be coherent - It is critical for business that there is consistency in the measures adopted by different local authorities – it would be unreasonable, for example, to expect haulage businesses to in operate HGV fleets which have to meet different air quality standards in different localities.

• Not prejudice SMEs - It should be taken into account that many haulage businesses are SMEs ranging from owner-drivers to operators with a small number of vehicles. Many such businesses will not be able to undertake major investments or bring forward investment plans without threatening their commercial viability. In the mineral products sector there is already a shortage of drivers and capacity in many areas and the ability of operators to implement new requirements must be a significant aspect of the impact assessment of potential regulations and measures.

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

No comment

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?

No comment

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

No comment

Is adequate consideration given to air pollution from agriculture?

No comment

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

No comment