Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from Road Haulage Association Ltd

Introduction

1. The RHA would like to thank Environment, Climate Change and Land Reform Committee of the Scottish Parliament for giving us the opportunity to respond to its inquiry into air quality in Scotland.

2. Background about the RHA

3. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs and ranging from single-truck firms to those with thousands of vehicles, provide essential services on which UK businesses and the economy depend.

4. We proactively encourage a spirit of entrepreneurism, compliance, profitability, safety and social responsibility. We do so through a range of member services including advice, representation and training.

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

5. The RHA recognises that there is a need to deal with local air quality issues that impact on people’s health. We believe this should be done based on the needs of the area concerned.

6. Euro VI emission standards for HGVs and buses should not be confused with the Euro 6 standards used in car and van emission testing. Euro VI engines fitted to HGVs (and buses) have been tested and shown to perform to standard in real-world operation – in contrast to Euro 6 diesel engines fitted to cars and vans.

7. The RHA is urging caution in applying Air Quality restrictions to Heavy Goods Vehicles (HGVs) across Scotland.

8. There is a lack of evidence provided as to the sources of local air pollution in this case. Before decisions are taken on applying restrictions to vehicles there needs to be a clear understanding about the sources and causes of poor local air quality. It is essential to know what air quality impacts HGVs are

1
having in the restricted zones before any Clean Air Zone is implemented.

9. If poorly executed, a Low Emission Zone will add significant costs to local businesses and consumers will put some businesses in financial peril and may not materially improve health or local air quality

Are the policies sufficiently ambitious?

10. Using London as an example, according to Transport for London (TfL), in 2013 HGVs were the source of 10% of NOx emissions in London. Buses and coaches accounted for 13%, Diesel cars 14%, Aviation 8% - Domestic and Commercial gas accounted for 19% of NOx emissions.

11. Between the introduction of Euro VI in 2014 and the end of 2016, the RHA estimates that the NOx emissions across Great Britain from HGVs reduced by about a third. This improvement will continue over coming years. By the end of 2019, at current vehicle replacement rates, we estimate that two-thirds of road haulage will be undertaken by Euro VI vehicles, this will result in a reduction in NOx from HGVs of just under 60% (see figure X in the annex below).

12. The life of the most intensively used HGVs is about 10 years. For specialist vehicles the life span of the lorry can be much longer.

13. Table 1 in the Annex below shows the improvement in emission performance by vehicle age. At the beginning of 2020 there will still be significant numbers of pre Euro VI HGVs in use. A small proportion activity will be done by Euro IV or earlier vehicles (about 11%), about 25% of haulage will be done by modern Euro V vehicles, with the majority of work (64%) done ultra-low emission compliant Euro VI vehicles.

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

14. The RHA believes Low Emission Zone proposals need to focus on areas of greatest public health risk. As has been demonstrated in London and elsewhere, these are often clearly defined areas where buses and taxis are subjected to high levels of congestion.

15. The RHA suggests that action:-
a) Should focus on vehicles creating the most pollution in pollution “hot spots”, in particular the worst performing buses and taxis – (an example of a positive
approach is the London “low emission bus zones” focusing Euro VI buses on pollution “hot spots” in London).

b) Should reduce congestion in key areas of high pollution through better traffic management, smarter vehicle routing and improved roadworks management.

c) Should encourage use of the road network outside peak periods. Studies have shown that vehicles moving slowly due to congestion are a major cause of pollution.

16. We believe that any Low Emission Zone should evaluate other emission sources. Other transport (rail and private cars) and non-transport sources of pollution need to be considered if meaningful improvement to air quality is to happen where it is needed.

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

17. When implementing any low emission zone consideration must be given to businesses, particularly SME’s who may operate older fleets and the financial burden an LEZ could place on a business being forced to invest in vehicles before they are naturally able to. Any implementation must be phased to allow these businesses the opportunity to upgrade their fleets to compliant levels.

Annex -

Information on the GB Lorry Fleet and Emission Standards

1. The below table shows the Euro standards for HGVs and buses by year with a summary of NOx standards.

<table>
<thead>
<tr>
<th>Euro Standard</th>
<th>NOx Standard*</th>
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<tbody>
<tr>
<td>Euro VI</td>
<td>0.4</td>
</tr>
<tr>
<td>Euro V</td>
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</tr>
<tr>
<td>Euro IV</td>
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</tr>
<tr>
<td>Euro I</td>
<td>8.0</td>
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</tbody>
</table>

*Nox emissions based on Maximum permitted for vehicle type
This is a summary of the NOx standards only.

2. It is worth noting that newer lorries are used more intensively, older vehicles less so. Given this, the below table shows the reduction in NOx from HGVs in GB for selected years between 2013 and 2025 (based on current expected replacement rates).

Table 2
3. Across Great Britain the reduction in NOx emissions from lorries have reduced by about a third since 2013 by the end of 2016. This decline will continue over time as older lorries are retired and are replaced by Euro VI vehicles.