

SCIENTIFIC AFFAIRS

Ref:
8 March 1999

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Dear Sir or Madam,

DETR "REVIEW OF UK NATIONAL AIR QUALITY STRATEGY"

The following submission has been prepared under the aegis of the Environment, Health and Safety Committee of the Royal Society of Chemistry.

The Society's Royal Charter obliges it to serve the public interest by acting in an independent advisory capacity and we are happy for this submission to be put into the public domain.

The Society welcomes the opportunity to comment on the Review of the National Air Quality Strategy Document. We found the document to be clearly expressed and well laid out, however we have reservations about a number of aspects of the review which we highlight below.

We welcome the approach of maintaining a rolling strategy with periodic reviews, since this enables the strategy to be modified in the light of both societal requirements, legislative needs and scientific understanding. However, it must be recognised that the current strategy is based on extremely uncertain scientific understanding.

Current monitoring data is insufficient to justify many of the conclusions drawn, and inadequate to provide validation of the models that have been used for extrapolations. As a consequence the current predictions from these models may be wildly inaccurate and they do not form a sound basis for large scale expenditure.

Similarly, although the development of COBA procedures is to be welcomed, these procedures are not yet at a stage where they can realistically be used to determine policy. We would support further research in both these areas.

However, despite the current uncertainties in the science base, this should not be used as an excuse for inactivity. The Government should press ahead with measures to reduce atmospheric emissions based on a 'no regrets' philosophy. Many of these improvements will be very cost effective and the Government has a duty to encourage such actions. Where improvements would involve substantial expenditure and where the end result is uncertain, more thought needs to be given before indulging in precipitate action.

It is particularly important to ensure that Government policy is consistent across all departments of state, i.e ensure that all actions taken including those of the Treasury and Dti are pushing in the same direction.

In the end, the main limits to progress in air quality improvement are our willingness to put in place suitable drivers to encourage it and our understanding of the relevant science and technology.

In relation to the latter the aim of government policy should be twofold. Firstly, we must improve our scientific understanding so that we do not set unnecessarily strict standards (because our ignorance necessitates including a very large margin of safety). Secondly, we must improve our technology (pollution is often the result of inefficient technology) and with it our economy so that improvements in air quality are inevitable and affordable.

Both of these aims are dependent on a better understanding and application of the relevant chemistry (process chemistry, environmental chemistry, biochemistry and toxicology).

I hope these comments are useful.

Yours sincerely,

[Professor D Taylor](#)
[Chairman, Environment, Health and Safety Committee of the Royal Society of Chemistry](#)

The Royal Society of Chemistry was formed from a merger of the Chemical Society (founded in 1841) and the Royal Institute of Chemistry (founded in 1877); it inherited the prestige and responsibilities of its parent bodies. It is both the learned society for chemistry and the professional qualifying body for chemists in the United Kingdom.

There are about 46,000 members, of whom 10,000 are based abroad. Professional membership of the Society is an internationally recognised qualification. The Society also administers the examinations for the Mastership in Chemical Analysis (MChemA) which is a statutory requirement for practice as a Public Analyst.

The Society is one of the world's major chemical publishing houses with a wide range of primary, secondary, and tertiary literature, including research journals, abstracts and indexes, educational publications and computer-based information services.

Strong ties are maintained with government both at national and at European Community level. Formal contact with parliament is maintained through the Society's two parliamentary advisers and through its Link Scheme, whereby members of the Society are linked with individual Members of Parliament.

The Society has 35 local sections in the United Kingdom and the Republic of Ireland and a number of local sections overseas.