

Air pollution: outdoor air quality and health

Consultation on draft quality standard – deadline for comments 5pm on 19/10/18 email: QSconsultations@nice.org.uk

	<p>Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.</p> <p>We would like to hear your views on these questions:</p> <ol style="list-style-type: none">1. Does this draft quality standard accurately reflect the key areas for quality improvement? If the systems and structures were available, do you think it would be possible to collect the data for the proposed quality measures? Do you have an example from practice of implementing the NICE guideline(s) that underpins this quality standard? If so, please submit your example to the NICE local practice collection on the NICE website. Examples of using NICE quality standards can also be submitted.2. For question 4, draft quality statement 1: To ensure this statement is practical and measurable, should it focus on particular vulnerable groups: people with chronic respiratory and cardiovascular conditions; children; pregnant women; older people?3. For question 5, draft quality statement 1: To ensure this statement is practical and measurable, should it focus on providing advice at particular types of health appointment such as: initial antenatal booking appointments; child health checks; annual reviews for people with chronic respiratory or cardiovascular conditions; when presenting with an exacerbation of a respiratory or cardiovascular condition?
<p>Organisation name – stakeholder or respondent (if you are responding as an individual rather than a registered stakeholder please leave blank):</p>	<p>[Energy Saving Trust]</p>
<p>Disclosure Please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry.</p>	<p>[None]</p>

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Name of commentator person completing form:		[Anna Cuckow]	
Supporting the quality standard - Would your organisation like to express an interest in formally supporting this quality standard? More information.		[No]	
Type		[office use only]	
Comment number	Section	Statement number	Comments
Insert each comment in a new row. Do not paste other tables into this table because your comments could get lost – type directly into this table.			
Example 1	Statement 1 (measure)		This statement may be hard to measure because...
1	Quality Statement 4 Reducing Vehicle Emissions	Structure 4a). 4a. Evidence that local authorities and NHS organisations identify how they will reduce emissions from their vehicle fleets to address air pollution.	We strongly support this draft quality statement. Every NHS Trust and public sector fleet should have plans in place to reduce their fuel use, mileages and emissions – and save money. Energy Saving Trust has worked with hundreds of NHS and public fleets in recent years, providing free-of-charge, and impartial advice on practical improvements, based on tailored fleet analysis. Our work is predominately funded by the Department for Transport. An effective plan would include a travel hierarchy (a decision-making process to help staff select cost-effective and sustainable travel options, prioritising public transport, active travel and pool cars etc). The plan should also cover measures to improve mileage efficiencies, pay appropriate reimbursement rates, a vehicle policy which encourages more fuel efficient car choices, and adoption of electric or plug-in hybrid vehicles. Fewer journeys in newer, fuel-efficient, better maintained vehicles will contribute to air quality improvements.
2	Quality Statement 4 Reducing Vehicle Emissions	Structure 4a)	One key area of quality improvement missing from this statement: actions to reduce the use of grey fleet vehicles. Grey fleet are vehicles owned by employees and driven for businesses purposes, reimbursed on a pence per mile rate. We would like to see the statement expanded to: “reduce emissions from their vehicle fleets, including private cars driven for work purposes (grey fleet)”.

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			<p>On average, grey fleet vehicles are older (average age 8.2 years) and therefore more polluting than the alternatives, such as public transport, company cars, salary sacrifice cars, daily rental, and pool cars. Unmanaged grey fleet is also associated with duty of care risks and inflated mileage reimbursement costs. Every well-managed fleet ought to have this information.</p> <p>Energy Saving Trust and BVRLA's research estimated that 624 million miles are driven in grey fleet vehicles each year by NHS Trusts, at a cost of £317 million (2016 figures). This mileage would generate 185,000 tonnes of CO₂, 462 tonnes of NO_x and 17,000kg of particulate matter annually. These figures are likely to be an underestimate because they were based on NEDC figures (the EU emission test regime currently being phased out due to the disparity between test and real world emissions).</p> <p>From our experience working with many fleets over several years, we are confident that many more could make significant cost, environmental and air quality improvement without impacting on care delivery, especially through working closely with community nurses and other high mileage drivers, for example.</p> <p>In January 2018, EST presented to the NHS Transport & Logistics Best Practice Group (part of the National Performance Advisory Group) on the topic of grey fleet management. We also recently engaged with NHS Sustainable Development Unit, providing case studies.</p>
3	Quality Statement 4 Reducing Vehicle Emissions	Structure 4b) Evidence that local authorities and NHS organisations require commissioned services to identify how they will reduce emissions from their vehicle fleets to address air pollution.	<p>EST would support the inclusion in tender documents of a requirement for suppliers to state the measures they have undertaken to minimize air quality emissions from their fleets, where appropriate. This could include membership of an independently-audited standard, such as Fleet Operator Recognition Scheme (FORS).</p> <p>Greater attention also needs to be paid to heavily polluting diesel-powered refrigeration generators, which are extensively used to supply the NHS. This could be made explicit in the draft standard. To date, Transport Refrigeration Units (TRU) have been regulated to less stringent standards than on-road vehicles.</p> <p>Technology exists to retrofit abatement technology to Stage V standard, and some alternatives to diesel –powered TRUs have been developed, but they are more expensive, especially as most TRU are run on subsidised red-diesel. Alternatively, NHS services could insist on new vehicles with Stage V standard TRUs (into force 2019) as this is a vast improvement on current standards. Scrutiny in procurement processes could have a significant impact and incentivise market development – and improve air quality.</p>
4	Quality Statement 4	Outcome 4a) Proportion of	This quality statement is important as the adoption of electric (and fuel-efficient vehicles) by public sector fleets can be

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	Reducing Vehicle Emissions	low-emission vehicles within local authority and NHS organisation vehicle fleets.	highly cost-effective and inspire wider action. A precedent has been set through the Government Fleet Commitment, which has a target for 25% of central government department cars to be ultra low emission vehicles (ULEVS) by 2022. EST is working with the Crown Commercial Services to provide electric and plug-in hybrid vehicle specifications for procurement, which the NHS can also use to acquire vehicles. We also advise on how EVs can be phased-in cost-effectively and practically.
5	Quality Statement 4 Reducing Vehicle Emissions	Outcome 4a) Proportion of low-emission vehicles within local authority and NHS organisation vehicle fleets.	Data on this statement would be hard to collect or interpret unless a definition is agreed and used consistently between fleets. An ultra-low emission vehicle emits less than 75g/km CO ₂ , including electric, plug-in hybrid and hydrogen fuelled cars. Newer or highly fuel-efficient petrol or diesel vehicles could qualify as “low emission” vehicles.
6	Quality Statement 4 Reducing Vehicle Emissions	Outcome 4a) Proportion of low-emission vehicles within local authority and NHS organisation vehicle fleets.	To make data collection useful, EST suggest that the standard asks for evidence on the proportion of Ultra-Low Emission Vehicles, as well as the proportion of Euro 4 petrol and Euro 6 standard diesels vehicles in the fleet, both owned and grey fleet. These are Euro standards used for Clean Air Zone compliance and are therefore directly relevant for air quality.
7	Quality Statement 4 Reducing Vehicle Emissions	Outcome 4b) Overall fuel consumption for local authority and NHS organisation vehicle fleets	It should be straightforward for well-managed fleets to provide this data. Accurate fuel consumption (and mileage) data is highly necessary and the starting point for making any operational improvements, EV adoption, and calculating carbon footprints (or NO _x or PM emission estimates). There can be difficulties getting sufficient levels of detail, but there are many software solutions available and EST can advise (free of charge) on how set up appropriate reporting systems and understand their data.
8	Quality Statement 4 Reducing Vehicle Emissions	Outcome 4b) Overall fuel consumption for local authority and NHS organisation vehicle fleets	For the reasons noted in Structure 4a) above, fuel consumption data should include both owned fleet vehicles and grey fleet use (through mileage expense records).
9	Quality Statement 4	Other	EST notes the suggestion in the briefing document that driver training could reduce vehicle emissions. We recommend

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	<p>Reducing Vehicle Emissions</p>	<p>that driver training is not included in the standard at this time. Our research investigating the relationship between driving style and air quality emissions has been inconclusive. This is in contrast to strong evidence we have on CO₂ emissions and fuel consumption reductions following training.</p> <p>As EST leads on the efficient driving (Ecodriving) agenda, as referenced in the Government's recent Road to Zero strategy, we would be highly interested in any other research which provides robust evidence on the air quality emissions and driving style, and welcome further discussion.</p>

Insert extra rows as needed

Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Include section number of the text each comment is about eg. introduction; quality statement 1; quality statement 2 (measure).
- If commenting on a specific quality statement, please indicate the particular sub-section (for example, statement, measure or audience descriptor).
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table – type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons). We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance and quality standards that we have produced on topics related to this quality standard by checking [NICE Pathways](#).

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

Comments received from registered stakeholders and respondents during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.

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