



44 Grand Parade, Brighton BN2 9QA
Phone – 01273 878770
Email – admin@environmental-protection.org.uk

Tony Baker
Cleaner Fuels & Vehicles
Department for Transport
Zone 1/34
Great Minster House
76 Marsham Street
London
SW1P 4DR

Sent by email to – TonyT.Baker@dft.gsi.gov.uk

17th June 2010

Dear Sir

Consultation on draft regulations which amend the Motor Fuel (Composition and Content) Regulations 1999 to implement European Directive 2009/30/EC with respect to Fuel Quality

We are writing to provide you with our views on the above consultation. Environmental Protection UK has considered the draft document, and welcomes the opportunity to comment.

1– About Environmental Protection UK

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

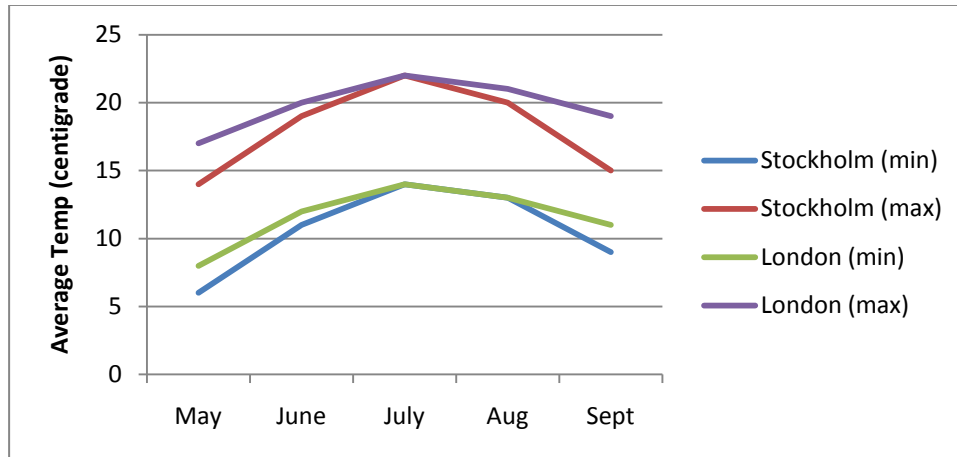
2 – Our Views on the Consultation

Fuel quality is essential to the efficient and clean running of vehicle and non-road machinery engines and as such we strongly support most of the proposals in the consultation document. We would however like to draw your attention to two areas of the proposals

Petrol Vapour Limits

We do not agree with the UK's continued derogation from the 60kPa vapour pressure limit. The consultation document states that the UK's summer climate is similar to that of Scandinavia. Whilst the climate of southern Scandinavia may be comparable to northern England, it is not true of southern England as shown in the graph below. The hottest months of the year are roughly equivalent, however the 'shoulder' months are far warmer in southern England than they are in Scandinavia.

Figure 1 – Average minimum and maximum temperatures in Stockholm and London (Source – BBC website)



As the consultation document suggests, the purpose of the derogation facility is to aid vehicle starting in cold climates. However, in warmer climates such as southern England the result is higher evaporative hydrocarbon emissions than with a 60kPa vapour pressure limit, and consequently greater ozone formation. Ozone is a significant problem in southern England – the consultation acknowledges ozone’s role as a respiratory irritant, however this underplays ozone’s impact – it is associated with premature death and respiratory illness. As a widespread rather than ‘hot spot’ pollutant, ozone also affects vegetation and crops. It is estimated that ozone reduces the yield of wheat grown in southern Britain by 5% to 15%¹, which would imply a serious financial loss to agriculture. There is currently a rising trend in ozone concentrations in southern England, and strong action on precursor emissions is needed if this is to be reversed.

We note that the impact assessment does not attempt to quantify the costs and benefits of continuing with the 70kPa vapour pressure limit. In our view this is a serious oversight in the impact assessment. As detailed above, we also feel that the consultation document is misleading in its comments that the UK has a similar summer climate to Scandinavia.

Sulphur Content of Gas Oil

As the consultation document suggests, virtually sulphur free diesel is a necessary enabling technology for the use of certain catalytic emissions abatement equipment – higher sulphur levels poison the catalyst rendering them ineffective. This lack of availability of sulphur free fuels has been a major hindrance to the early adoption of emissions abatement equipment for NRMM – as required, for example, in the Mayor of London’s ‘London Best Practice Guidance: The control of dust and emissions from construction and demolition’².

We understand why the full costs and benefits attributable to the move to sulphur free diesel have not been included in the impact assessment, as these would be ‘double counting’ the figures in the impact assessment associated with the NRMM

¹ Source – Environmental Audit Committee
www.publications.parliament.uk/pa/cm200910/cmselect/cmenvaud/229/229i.pdf

² http://static.london.gov.uk/mayor/environment/air_quality/construction-dust.jsp

Directive. However, there is a substantial retrofit market for emissions abatement equipment, and one that has been held back to date by the poor availability of sulphur free fuel. An estimation of the benefits in terms of greater take-up of retrofit emissions abatement equipment should form part of the impact assessment.

We are also concerned that the DfT is proposing to mandate sulphur free fuel for NRMM only when the Directive requires them to do so, i.e. to fit in with the introductory dates of stage IIB and IV limits. As we suggested above, there is substantial pent up demand for sulphur free fuel to enable the use of emissions abatement equipment on NRMM; as such maximum benefits would be secured if sulphur free fuels were introduced across all sectors as soon as reasonably practicable. This, for example, would facilitate earlier, widespread use of the aforementioned London guidance.

Finally, we are informed that whilst a 20 mg/km upper limit on the sulphur content of diesel supplied will not adversely affect emissions abatement technologies, these technologies work most effectively with very low sulphur levels. For this reason the DfT should make very clear that the 10 mg/kg leeway for contamination in the fuel chain should be for exceptional circumstances, rather than being treated as an acceptable target to aim for.

4 - Contact Us

If you require any further information on the views expressed in this response please contact:

Environmental Protection UK

Ed Dearnley

Phone - 01273 878771

Email - ed.dearnley@environmental-protection.org.uk

