

COVID-19: GUIDANCE FOR LOCAL AIR QUALITY MANAGEMENT REPORTING IN 2021 DUE TO COVID-19

This statement is for local authorities in England, including London, only.

Defra is writing to local authorities to make them aware of the following guidance changes under consideration for Local Air Quality Management (LAQM) duties, described in Part IV of the Environment Act 1995, for the 2021 reporting year due to the impacts of COVID-19 and the associated restrictions on activity.

The purpose of this statement is to make you aware of the items under consideration, seek your views on the suggested approach and consider whether there are any additional areas we could address.

Following this initial consultation process, detailed guidance will be published which will comprehensively outline how local authorities will be advised to carry out their LAQM duties in 2021.

Delays and Resourcing Constraints

Defra is aware that measures put in place to combat the spread of COVID-19 may have impacted, and may continue to impact, local authority resource for air quality work which therefore may cause delays in reporting. Presently, the statutory deadline of 30th June (English authorities) and 31st May (London boroughs) for the year 2021 will remain but we will take a flexible and realistic approach when there is a risk that this deadline may be missed. We will ask authorities to write to us if they require an extension due to COVID-19 for 2021 reporting, so we can consider and respond to requests based on the specific circumstances of each local authority. We will ask local authorities to do so by emailing Air.Quality@defra.gov.uk (English authorities) or poppy.lyle@london.gov.uk (London boroughs) outlining how resources have been impacted and the extension they wish to apply for.

That said, we are also seeking views on aspects of last year's monitoring that may affect this year's reporting deadline, as later discussed.

Reporting on COVID-19 in 2021 ASR Templates

Defra and the Greater London Authority will alter the 2021 Annual Status Report (ASR) template to include a bespoke 'COVID-19 impacts' section. Standard lines to include will be provided and we will encourage local authorities to summarise and discuss the local impacts of COVID-19 that have been observed (including instances where, for example, localised lockdowns were enforced that other areas may not have been subject to).

It is anticipated that this section will also be used to highlight and discuss the wider constraints caused by the COVID-19 pandemic, such as the ability of local authorities and

their partners to implement air quality improvement measures. It may also be used to highlight any positive actions that have been taken within the local authority area in response to the pandemic, for example to promote walking and cycling as sustainable travel options.

If any detailed analysis of the impact of COVID-19 either on air pollutant concentrations directly or on contributing factors to air quality (e.g. traffic) has been undertaken, local authorities will also be asked to include this within this section.

AQMA Status

We recognise that air pollutant concentrations may have been significantly impacted by the change in activity observed across the UK as a result of COVID-19 and the associated measures. This may have led to changes in compliance with air quality strategy objectives in Air Quality Management Areas (AQMAs) in the year 2020. Defra's current guidance states that it is expected that authorities will consider measurements carried out over several years when considering the revocation of an AQMA, as well as national trends in emissions and measures introduced as part of an Air Quality Action Plan (AQAP). We will advise against the revocation of an AQMA based solely upon compliance being reached in 2020 as this year may not be representative of long-term trends in pollutant concentrations and we must be confident that air quality objectives will continue to be met in future years. Where 2020 is one of many consecutive years of compliance, this may be considered for revocation. If authorities wish to make any changes to AQMAs, whether declaration, amendment or revocation, based upon 2020 data, please contact the LAQM Helpdesk to discuss your approach.

Impacts on 2020 Monitoring Data

Since 2020 data, whilst potentially anomalous compared to preceding years, is reflective of real-world events, we will encourage presenting and discussing the 2020 data in preference to excluding it altogether. We will simply be asking authorities to make it clear how monitoring was impacted and, if appropriate, highlighting that the data should be treated with caution. We will also ask authorities to acknowledge that data from this year may differ significantly when compared with historical trends.

In 2020, COVID-19 and the associated measures may have impacted the data capture and/or quality of both diffusion tubes and continuous analysers. Defra will advise the following and provide further detail in the final guidance where appropriate:

- **Data capture:** In regard to poor data capture, current guidance will remain. Where data capture is less than 75% of the year, annualisation techniques can be used to estimate an annual average from a part year average, as current guidance states. There must be a minimum of 3 months of data available for annualisation.
- **Annualisation:** We are aware that the ability to annualise data in line with current guidance may have also been impacted by COVID-19. We are considering the impacts of amending the criteria for annualisation, such as the relaxation of the

50mile distance criteria and will consider the most appropriate sites against which to annualise.

- Impacts on diffusion tube exposure dates: Guidance issued earlier in 2020 stipulated that where it was not safe to do so, or if resource needed to be deployed elsewhere, there was no expectation that local authority officers should expose diffusion tubes in line with the 2020 Diffusion Tube Monitoring Calendar dates. A diffusion tube exposure trial currently being undertaken will inform advice on how to use data from diffusion tubes exposed outside of recommended diffusion tube calendar periods.
- Impacts on diffusion tube sample storage: We are aware that exposed diffusion tube samples may have been stored for longer periods than usual, and/or in less preferable conditions to how they would be normally stored. We are considering the impact that this may have on the quality of the data and will provide advice accordingly.
- Impacts on continuous monitoring data quality: We are aware that COVID-19 may have given rise to forced changes to typical continuous monitoring procedures, either in relation to service and maintenance regimes, calibration regimes or independent audit regimes (QA/QC). We are considering the impact that this may have on the quality of the data and will provide advice accordingly.

In order to communicate clearly with the public regarding the potential impact of COVID-19 on data capture and quality, we will introduce a simple flagging system for monitoring data from diffusion tube and continuous analysers. This flagging system will indicate to readers where authorities have adopted COVID-19 guidance, where, for example, data capture was less than 75% and changes to the annualisation criteria have taken place.

We welcome your thoughts and opinions on the above points under consideration and the flagging system to inform readers.

Diffusion Tube Bias Adjustment

We would like to get an early indication of how local and national diffusion tube bias adjustment studies have been affected by COVID-19. We are willing to consider consolidating national bias adjustment factor updates and extending the report submission deadline to facilitate the inclusion of more studies in the national bias factor calculations if the benefits of doing so are found to be significant.

Potential Adjustment to LAQM Tools

The tools used by local authorities in their assessment of air quality are occasionally adjusted. Adjustments often depend on data inputs such as those from the National Atmospheric Emissions Inventory (NAEI) and Department for Transport (DfT). The Emissions Factors Toolkit (EFT) may be adjusted and we will update local authorities in due course on this.

2020 Data for Dispersion Modelling Verification

We are currently considering the approach to take in regard to using 2020 monitoring data for dispersion modelling verification as part of detailed modelling studies, AQAPs or planning related work. Defra welcome opinions on whether to use 2020 data for model verification. Other options include:

- Asking authorities to use 2019 data for their modelling;
- Requiring sensitivity analysis if 2020 data is used; or
- Using 2020 data if other associated inputs are appropriately adjusted.

It should be noted that the final guidance will be specific to LAQM duties, and wider application will be up to each local authority.

Local Authority Survey

To facilitate local authority consultation in relation to this statement, a short survey has been established. We would welcome your participation in this survey, which should take no longer than 15 minutes to complete. Responses will be used to inform final COVID-19 guidance. The consultation survey will remain open until 10th February 2021.

Please contact the LAQM Helpdesk if you are a local authority and wish to participate in this survey.