

# GREATER **LONDON** AUTHORITY

Our reference: MGLA210323-3118

20 April 2023

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 20 March 2023. Your request has been considered under the Freedom of Information Act 2000.

You requested:

1. Electronic copies of the minutes of all NRMM Committee meetings since its inception, plus (if not included within the minutes)
2. A list of the committee's current members by name and organisation.

Please find attached the information we hold within the scope of your request regarding the committee meeting minutes held on file.

The NRMM committee is held on a purely advisory capacity and is not a decision-making body. When the NRMM LEZ was first established, the committee met regularly to advise the scheme, providing industry background during roll out of the scheme. The committee now meets less frequently, and acts in an advisory capacity during periods of policy or industry change. All exemptions discussed at committee, and decisions regarding the NRMM policy are made separately and independently by the GLA.

Please find below the information we hold within the scope of your request regarding the committees' members. Please note that the names of members of staff are exempt from disclosure under s.40 (Personal information) of the Freedom of Information Act. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

- Greater London Authority
- Imperial College London
- Society of Motor Manufacturers & Traders (SMMT)
- Environmental Industries Commission (EIC)

# GREATER**LONDON**AUTHORITY

- Cleaner Construction for London – Enforcement officers delivering on behalf of GLA
- High Speed 2 (HS2)
- Construction Plant-Hire Association (CPA)
- Energy Savings Trust (EST)
- Transport for London (TfL)
- Construction Equipment Association (CEA)
- Association of Manufacturers of Power Generating Systems (AMPs)

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA210323-3118

Yours sincerely

## **Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

**Minutes**  
**Non Road Mobile Machinery (NRMM) Committee**  
**Thursday 11<sup>th</sup> December 2014**  
**1430-1630**  
**Room 4.2E City Hall, The Queens Walk, London SE1 2AA**

**Attendees:** []

**Apologies:** []

Chair: []

Secretariat: []

**1. Welcome & Introductions**

ET welcomed committee members giving a brief overview of the NRMM policy coming into force in September 2015 and the need for the industry to discuss potential exemptions. This was followed by a roundtable of introductions where committee members confirmed their respective affiliations.

**2. NRMM Committee Governance – Terms of Reference (TOR)**

ET read out the TOR, explaining that agreeing NRMM exemptions is a transparent and publicly accountable process whereby committee agendas and minutes will be made publicly available.

ET suggested that the committee meet no more than twice per annum. However, KM suggested that we meet more often (3-4 times per annum) in the interim because we have been convened to test the NRMM exemption process and more frequent meetings would be of benefit.

**Action:** Agreed, meet at least 3-4 times between now and September 2015 to be organised by GLA secretariat.

KM suggested that exemptions should be discussed using an evidenced based approach to give the committee the opportunity to consider each exemption request on its merits.

ML asked what would happen if no exemption evidence was provided e.g. how the committee would decide on an exemption without evidence. ET confirmed that the committee is designed to operate in a purely advisory capacity. It is not a decision-making body. All exemptions discussed will be made separately and independently by the GLA.

ET reiterated that the evidenced based approach would be adopted as far as possible. The exemptions evidence or lack of would be shared with the industry for comment as part of the continuing consultation process.

### **3. NRMM Exemptions Process**

ML asked whether the GLA will use Crossrail's NRMM database to cross-reference possible exemptions. ET confirmed that the GLA would use Crossrail's NRMM database to inform exemptions, also drawing on TfL's experience with rolling out the Low Emission Zone (LEZ).

MO requested clarification and reassurance on the exemptions process. Eminox was concerned that none of the exemptions submitted were included in the Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance (SPG). ET said that a list of all stakeholder NRMM comments will be made publicly available. However, the GLA reserves the right to include exemptions or not based on pertinent information presented by stakeholders and this was the intention of the SPG.

### **4. NRMM Exemption Form**

CW CPA to date has received nine replies from its members in response to the draft NRMM exemption form. Practically, forms will arrive sporadically between now and September 2015, in the interim what will happen when a large crane arrives at Crossrail and its exemption status is not clear?

ET exemptions based on class, engine size and emissions will become apparent as we go; this committee is the start of that process.

CW availability of machinery might be an issue therefore greater flexibility [exemption status] is required. MO the industry approach should be to fit a filter in such circumstances but at present the approach seems to be to do as little as possible, which needs to change.

ET confirmed that this was the intention of the SPG policy and the industry was clearly keen to work with the GLA and others to reduce their emissions.

MP this is identical to the LEZ implementation. For example, the level of exemption awareness in the beginning was low but once the LEZ was in place awareness and compliance increased dramatically.

ET we have to remind ourselves that NRMM exemptions will be a limited list in that not everything will be exempt, therefore the industry will need to take further measures to meet tighter emission reductions and adapt. ML we are in a different place to 5-year's ago due to (high) level of EU directive compliance. CW the industry approach, particularly among the larger CPA members will be to move compliant machinery into the London marketplace at the expense of other parts of the UK.

PW NRMM is an emission not a filter test. ET the NRMM policy covers both NO<sub>x</sub> and PM but it is still worthwhile delivering Particulate Matter (PM) reductions through retrofit because there is no safe PM limit. However, this process also represents an opportunity for the industry to develop joint PM/ NO<sub>x</sub> abatement technology. MP 6-years on from LEZ [filter] technology is better than OEM produced kit. OM the current cost ratio to retro-fit machinery with filter technology is 1-to-3, which should not be inhibiting.

CW CPA members will not fit filters on equipment for purely economic reasons.

### **NRMM Enforcement**

KM sought acronym clarification. The NRMM policy will be enforced by local authority officers. ET said that ideally an LEZ style approach will be adopted in the future to enforce NRMM with the ability to pay a charge to use equipment which does not meet the standard/issue penalty charge notices but currently such powers are not available to the GLA.

CS sought clarification as to whether the policy will enforce compliance? ET said there is flexibility within the SPG to provide exemptions for individual plant based on the absolute lack of availability (i.e. it simply isn't manufactured at the correct Euro stage level) or because of insufficient availability of a piece of equipment (i.e. it is manufactured but isn't available in the quantity needed). This could also be a dynamic system with exemptions changing to reflect the number of large scale sites and thus the demand for certain types of difficult to access pieces of equipment.

PW we need to avoid a situation where manufacturer x is exempt whereas manufacture y is not. ET NRMM compliance is an industry not manufacturer issue whereby we need to avoid penalising manufacturers; however, inevitably the policy will also reflect which manufacturers are producing the right kit, in the right quantity at the best possible emission standard and the SPG policy should act as an incentive to manufacturers.

MO in terms of availability a box can be added to the exemption form to determine how many days a piece of kit will be on-site.

KM the onus should be on splitting the fleet by engine class, size, year and emissions not availability because contractors will not be able to determine how long any piece of equipment is on-site.

CW Crossrail allows non-exempt kit on-site for up to a maximum of 7-days. ET ideally we need to categorise exemptions e.g. in a tabular or questionnaire format:

Category Exemptions	Exemption Description
Availability	1-3 days exemption for hard to obtain kit
Use	Only used intermittently over 1-3 days

BW Amec could produce a guidance note or flow-diagram with headings such as 'kit in London x number of days'; 'is it available'; 'if not, can another piece of equipment do the job' etc.

MO suggested category table headings include 'hours machine working per day'; 'NO<sub>2</sub> emissions on-site'. CW it is impossible to know how long kit is used for on-site as this is not recorded. MO can the CPA provide a solution or remedy so that the industry does start to record such information?

ML we should avoid time based exemptions. CS agreed we should concentrate on a list [database] of exemptions so that the industry knows specifically what kit is/isn't exempt. For example, LEZ uses the DVLA database to enforce compliance NRMM should develop a similar database.

CW a database is probably not necessary judging by the CPA membership response rate to the NRMM exemption form. The level of response (9 out of 1,450) indicates that the majority of kit is compliant. We are here to discuss exemptions.

ET an NRMM database represents best-practice. ML the industry knows what kit it has so should register it, one way of making this happen is via the NRMM SPG process. This will also help us understand how the NRMM fleet in London changes/improves over time.

## IIIA / IIIB Compliance Awareness

DC sought clarification from CPA as to whether there was IIIA and IIIB engine compliance awareness among its members. PW produced two forms (i) an emissions chart to explain how to identify the emission level of an NRMM engine, to aid operators assessing their fleets and the committee to discuss exemptions, and (ii) EU NRMM engine emission stages.

CW used Ainscough Crane Hire as an exemption case study. 180 of its fleet are non-compliant (neither IIIA nor IIIB engine machines). Of the circa 500 crane fleet only 13 are IIIB. KM NRMM investment cycle is in years and it may take a cycle or two to reach compliance.

ET LEZ is an example of stimulating the market to invest in compliant machinery NRMM will follow suit. CW some cranes are bought and kept for 20-years some machines are not designed to be retro-fitted with filters. FEM European Manufacturers body sent a letter in 2012 warning CPA members not to retro-fit machines with diesel particulate filters (DPF) as this would invalidate the warranty.

MO FEM letter is 2-years old and doesn't reflect the effectiveness of DPF in practice. IB the industry should not be put in a position where retro-fitting is the only option. ET confirmed that there would be no requirement for anyone to retrofit their vehicle, but it was important to have this as an option to try and keep compliance costs down as far as possible.

PW only fleet owners know the volume of non/compliant NRMM kit. ML Crossrail has data on volume of NRMM kit. CS the industry at large doesn't seem to know volume. PW consensus among industry majority of kit is IIIA.

ET the main issue seems to be the exemption status of crawler and mobile cranes because there are not many of the former and the industry is prepared to bring cleaner mobile cranes to London. CS the purpose of the NRMM policy is to encourage cleaner or compliant kit into London. ML contractors are aware that contracts will be awarded to those with the cleanest or compliant kit.

KM can the GLA/Amec provide some clarity on the NRMM boundary map and wording describing 'major' development. For example, where exactly does the boundary line start/end and what is meant by 'major' development.

**Action:** GLA/Amec to update NRMM boundary map describing where the line starts/ends, and specify what is meant by 'major' development using categories of development. GLA to share boundary map and 'major' development description with committee before sharing with consultees for comment.

## 5. NRMM Exemption Case Studies

CW used IIIA crawler crane as an exemption case study. To make the crane compliant will require a £20k filter to be retro-fitted. MO CRT filter is £5k not £20k but the cost depends on the size of the engine. CW using the evidence base to justify the exemption, Ainscough Crane Hire (largest company in the sector) only has 13 IIIB cranes in its fleet. CW suggested IIIA crawler cranes could be exempted in Central Activity Zone (CAZ) based on Crossrail evidence base of lack of availability.

**Action:** GLA to contact Cathy Myatt at Crossrail to discuss best-practice and its approach to exempting 100-tonne crane based on availability and/or other evidence base.

## 6. AOB

Next meeting early 2015.

**Action:** Secretariat to share meeting minutes organise next meeting.

DRAFT

**Minutes**  
**Non Road Mobile Machinery (NRMM) Committee**  
**19<sup>th</sup> March 2015**  
**1100-1230**  
**City Hall, The Queens Walk, London SE1 2AA**

**Attendees:** []

**Apologies:** []

Chair: []; Secretariat: [].

### **1. Welcome & Introductions**

BOB: Apologies for 2-week delay in holding this committee this was due to appointing a contractor to create the NRMM database.

ET welcomed committee members giving a brief overview of the NRMM policy coming into force in September 2015 and the need for the industry to discuss potential exemptions and the upcoming exemption consultation. This was followed by a roundtable of introductions where committee members confirmed their respective affiliations.

### **2. NRMM Exemption Consultation**

BOB confirmed that a 6-week consultation on possible exemptions to the policy would be held after the general election. In formulating possible exemptions we agreed that Crossrail's approach would be adopted helping the industry meet the standards as opposed to offering carpet exemptions. The onus would be on discussing options for retro-fit for both PM and NOx.

ET: the consultation process is designed to capture and understand NRMM use and availability, which will be achieved by collecting data using a dedicated database.

**Action:** Agreed, hold 6-week exemption consultation period after general election.

### **3. NRMM Guidance and Exemption Policy**

PW: there are no Stage IIIB generators. Fitting DPF or other retro-fit technology may not be possible at other stages. If for example, a company has invested in brand new equipment it would be unfair to expect them to retro-fit and it may invalidate the warranty. There is also no emissions stage for some kit therefore it should not have to be retrofitted. Constant speed engines will change post-2015 to Stage IIIB.

ML: If a company did decide to retro-fit would the warranty be null/void?

PW: it would be a decision between the manufacturer and purchaser.



CS: is the policy in-line with 2006 Best Practice Guidance or are we expecting the industry to achieve latest emissions targets and if not, retro-fit to become compliant?

DW: some manufacturers offer an 'option-to-fit' solution for DPF at time of purchase.

KM: there needs to be stronger wording of the exemptions policy than 'consider' in policy 3.1 below:

### 3.1 Retrofitting exempt kit

The possibility of retrofitting to mitigate for both PM10 and NOX must be considered (or if it is not possible to retrofit for both pollutants, just for PM10) before an exemption will be granted.

PW: if the equipment is brand-new there should be no additional requirement to retro-fit.

CW: the letter from the FEM – Swiss trade body warns that the warranty is void if abatement technology is retro-fitted. However, it is not void if the manufacturer fits it during manufacture. If it's retro-fitted after manufacture the warranty is void. This is because the retro-fit company guarantees the DPF not the engine. CPA will be advising its membership not to retro-fit.

CS: there is an industry wide product liability circa £5m warranty to cover engine following retro-fit.

CF: 6,000 buses have been retrofitted with DPF.

CM: Crossrail worked with the contractor to find a suitable solution to retro-fitting DPF.

CW: FEM has challenged CPA members attempts to retro-fit.

ML: FEM's letter is subject to challenge.

FC: the FEM letter is not engine more fuel focussed its not based on DPF blowing-up engines.

CM: Crossrail experience has been positive with contractors they produced a 'Use of Equipment Guide to Retro-fit'. Solutions include getting the equipment on the grid or smart e.g. solar-powered.

PW: the principle of the NRMM policy is to meet the EU Directive not to go beyond.

FC: the purpose of the policy is PM/NO2 reduction not fleet turnover.

CS: if you rely on the will of the industry or just aim to meet rather than exceed the standard that is not market leading its failure.

ET: we must work to the EU standard to clean the air.

CM: contractors have already purchased IIIA because no IIIB are available in such circumstances Crossrail policy has been to exempt IIIA engines. If there is no other kit available find another piece of kit than can do the same job.

CW: it costs circa £16k to retro-fit a crawler crane. 85% of all plant on-site is owned by CPA members.

CM: there is some select plant that could take an industry leading position and decide to retro-fit or only supply compliant kit.

ML: the wording of the policy is clear cost is not grounds for exemption only complaint kit is allowed in Greater London, CAZ and Canary Wharf.

CM: the contractor could alter the pricing structure of hiring kit to increase the uptake so that the cost can be spread out over a number of months/years.

CW: the vast majority of CPA member kit is compliant.

ML: there are other major projects upstream that could take the hit (financial) on retro-fit e.g. Thames Tideway Tunnel.

CW: DPF has to be maintained at cost to CPA member.

ET: moving on from retro-fit, the exemptions in the AMEC paper are a good starting point e.g. 30-day exemption.

PM: 30-days total not including bringing on/off site?

CW: tunnel boring machine with a Stage IIIA engine will not be retrofitted because there are too few, its engine idles continuously even during rigging.

CM: 30-day exemption is acceptable. CPA were hoping for 7-day not 3-day as in AMEC paper.

ML: 5-days would be reasonable.

BOB: managing an exemption process of less than 7-days would be difficult due to administrative burden although the NRMM database and register will help to overcome this difficulty.

**Action:** Agreed, insert 30-day exemption period into exemptions consultation paper.

#### 4. NRMM Database

DM: the database creates an individual record of equipment per site whereby the contractor uploads each piece of equipment. As per the SPG the site-manager is required to keep a central list of on-site NRMM.

PW: real data can be captured from the engine plate. Database fields should mirror those data fields using emissions guidance document produced by SMMT-OHEEG.

CM: there is a demand among contractors for an NRMM database not among CPA members.

PW: OEM insists that everything is complaint without supplying a list of complaint kit.

CM: Crossrail complaint kit kite-mark is marketing without necessarily seeking accreditation. One solution would be to mark machinery as 'retro-fitted' including machine, engine for PM and NOx as appropriate.

CW: what happens on 2<sup>nd</sup> September 2015 when a piece of non-compliant equipment turns up on-site e.g. how does the contractor obtain an exemption?

ET: GLA will create supporting documentation to support 'soft-launch' of the standards.

ML: TFL gave an extension to LEZ compliance. Will the NRMM LEZ offer the same extension?

PW: we have to be careful that availability of certain models of equipment should not be grounds to push contractors towards a particular manufacturer creating an uneven playing field.

**Action:** GLA to create FAQs and other supporting documentation.

## **5. AOB**

Next meeting post-consultation period end of July 2015.

**Action:** Secretariat to share meeting minutes organise next meeting.

**Minutes**  
**Non Road Mobile Machinery (NRMM) Committee**  
**Thursday 7<sup>th</sup> July 2016**  
**14:00-16:00**  
**Room 3.5W City Hall, The Queens Walk, London SE1 2AA**

**Attendees:**

[]

**Apologies:**

[]

**Chair and Secretariat: []**

**1. Welcome and introductions**

**SI** welcomed everyone and introduced new members, including himself and Local Authority representatives from Merton and Barnet. **SI** explained the two Mayors Air Quality Fund enforcement officer projects and the role of L.B. Merton and L.B. Barnet as lead authorities on these projects.

**2. a) Update on NRMM website and registry (Daniel Marsh)**

**DM** Presented current statistics on membership and use of the website (see appendix 2). The full presentation is appended to these minutes. The key points were:

- There is still a big gap between the number of registered sites and the number of sites who have entered equipment on the register. Data is being lost as a result.

- Some boroughs have many more registered sites than others; this appears to match boroughs where industry outreach/action has been done.
- Only 12 boroughs have a registered officer. **JA** noted that as some boroughs have shared services this was not necessarily representative.
- Some sites are starting to register Generators and other equipment that had previously been largely ignored.

**Action:** **SI** to identify shared services

## **b) Update on exemption requests and grants**

**SI** presented some basic stats on exemption requests and grants (see appendix 1); the full presentation is appended to these minutes. He also explained that prior to his appointment in May 2016 many exemption requests had not been processed within the agreed time limits and that a number of refusals were for equipment that had already completed its function and been removed from site.

Key points from the presentation:

- The majority of exemption requests have been refused.
- Most of the exemption requests, including those granted, are for using stage IIIA equipment in the CAZ/CW
- There are many more register entries where exemption requests have not been completed than submitted requests.
- There are a more entries that include retro-fit than applications for exemption on the basis of retro fit. **CS** noted that there are anyway more retro-fitted machines than are entered in the register.
- There are a number of instances where the operator has entered a higher engine stage after retro-fit.

## **3. Development of the website (All)**

A number of areas were highlighted as priorities for website improvements/updates:

- Handling of exemption requests and engine class: **SI** noted in the previous item that there some parts of this process that could be improved.
- Local authority tools, such as annotation and audit report download. **DM** and **JA** are already investigating this.
- Inclusion of a development start date.
- Project oversight accounts to allow for larger companies or head contractors to audit their own sites where they have multiple entries.

- Creation of a 'fleet list' in parallel to the 'site list' function. This would be a large piece of work but all agreed it would be a very useful functionality.
- More mandatory fields – particularly unique plant ID
- New information sections, including FAQ's, 'what is NRMM?' and information on 'error' codes

Several ideas for how plant identification could be improved were discussed, including the use of QR codes (**PW** noted that whilst a registration scheme could work for an LEZ a mandatory UK National registration scheme for all NRMM in scope of the emissions legislation (as run by DVLA for cars & trucks) would be burdensome and likely impractical, especially considering the wide range of NRMM going right down to chainsaws and lawnmowers), **KM** asked whether existing voluntary registration schemes (such as CESAR) could be used, **GA** thought that it would be hard to mandate use of voluntary schemes.

**Action: KM** to provide details of CESAR scheme  
**Action: DM & SI** to agree work on website updates

#### 4. Compliance and Enforcement

Update from Mayors Air Quality fund enforcement officer projects:

**JA:** The project is about to start recruiting for 3 full time officers. Some preliminary work is already being undertaken, mostly in developing the approach to identifying sites. Getting information from planning departments is difficult and different in different boroughs. Identifying small sites is particularly difficult as is identifying sites that have voluntarily registered and sites that have not registered.

The other priorities are developing model conditions and guidance for local authorities. The long term expectation is for 80 - 90% compliance through persuasion and influence rather than hard enforcement.

**RH:** The project is about to recruit 1 full time officer. The other priorities for the project are educating local authority planners about the requirements to ensure that they are delivered consistently and investigating how enforcement can encompass wider dust issues at the same time as NRMM.

**DM** noted that not all local authority codes of practice reference NRMM. **SI** explained how the GLA is continuing to promote the scheme with local authorities through engagement, information and introducing reporting requirements through the London Local Air Quality Management process.

#### 5. Positive recognition

**SI:** Discussion with a number of large contractors and infrastructure projects has raised the idea that a 'positive recognition' scheme for operators who are doing well could be well received. This could also promote compliance without resorting to enforcement.

**PW:** Any positive recognition scheme would need to be carefully designed so that it wasn't simply an award for basic compliance.

**JA:** Suggested FORS as a possible model. "Scores on the Doors" might also be a workable model.

**CM:** Crossrail found Supplier performance ratings and awards were successful, although some operators may have missed out as the awards were through application.

Any recognition would also need to be regularly reviewed and clearly dated. **JA** noted that inspection frequency would also need to be worked out.

Can achieving a given level of recognition be built into tendering?

**GA:** Health and Safety issues would need to be considered.

**KM:** Balance needs to be struck as going beyond compliance would be more possible for large sites than small. Small sites should not be penalised just for being small.

Care also needs to be taken that the scheme still ensures that the overall objective of reducing real world emissions is met.

**Action: SI** to develop options for positive recognition scheme for next meeting

## **6. AOB**

**SI:** GLA are investigating whether new powers for the Mayor or Local Authorities can be obtained from government to help deliver the NRMM LEZ.

**SI:** Would the committee support a small number of new zones where the tighter standards apply in addition to the CAZ and Canary Wharf.

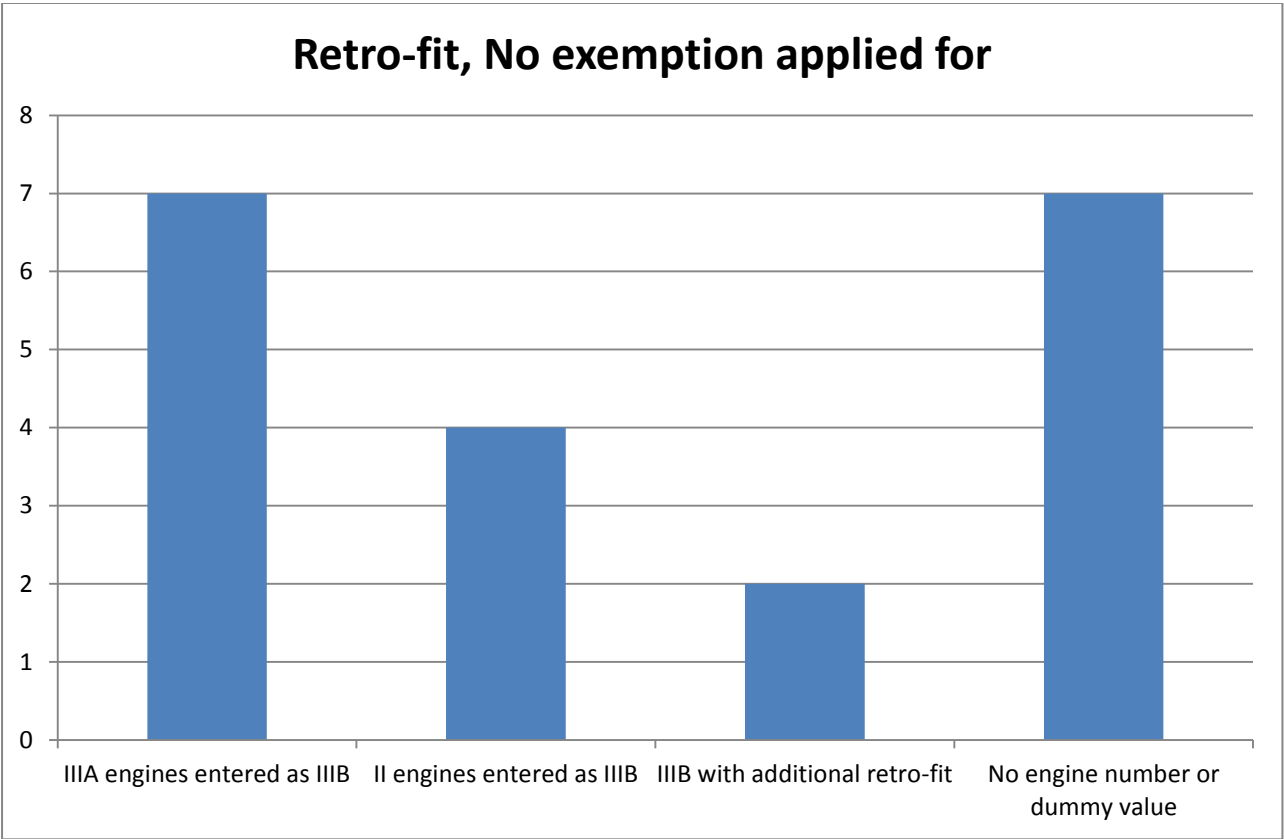
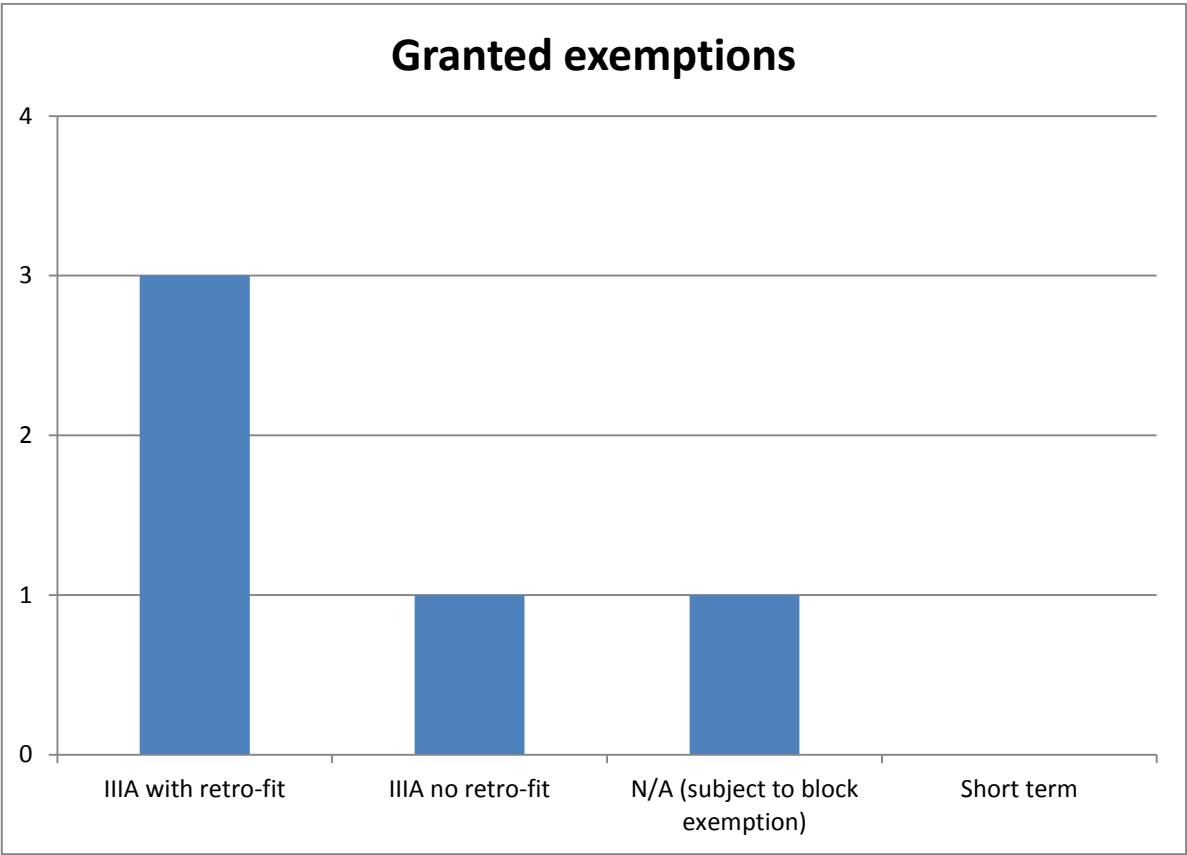
There was general support for the principal of this so long as:

- There is a strong case made for any new zones
- There is enforcement of existing zones before creating new ones
- There is sufficient lead-time for their introduction (maybe 2 years), and
- Any new zones are approved by the committee

## **7. Date of next meeting**

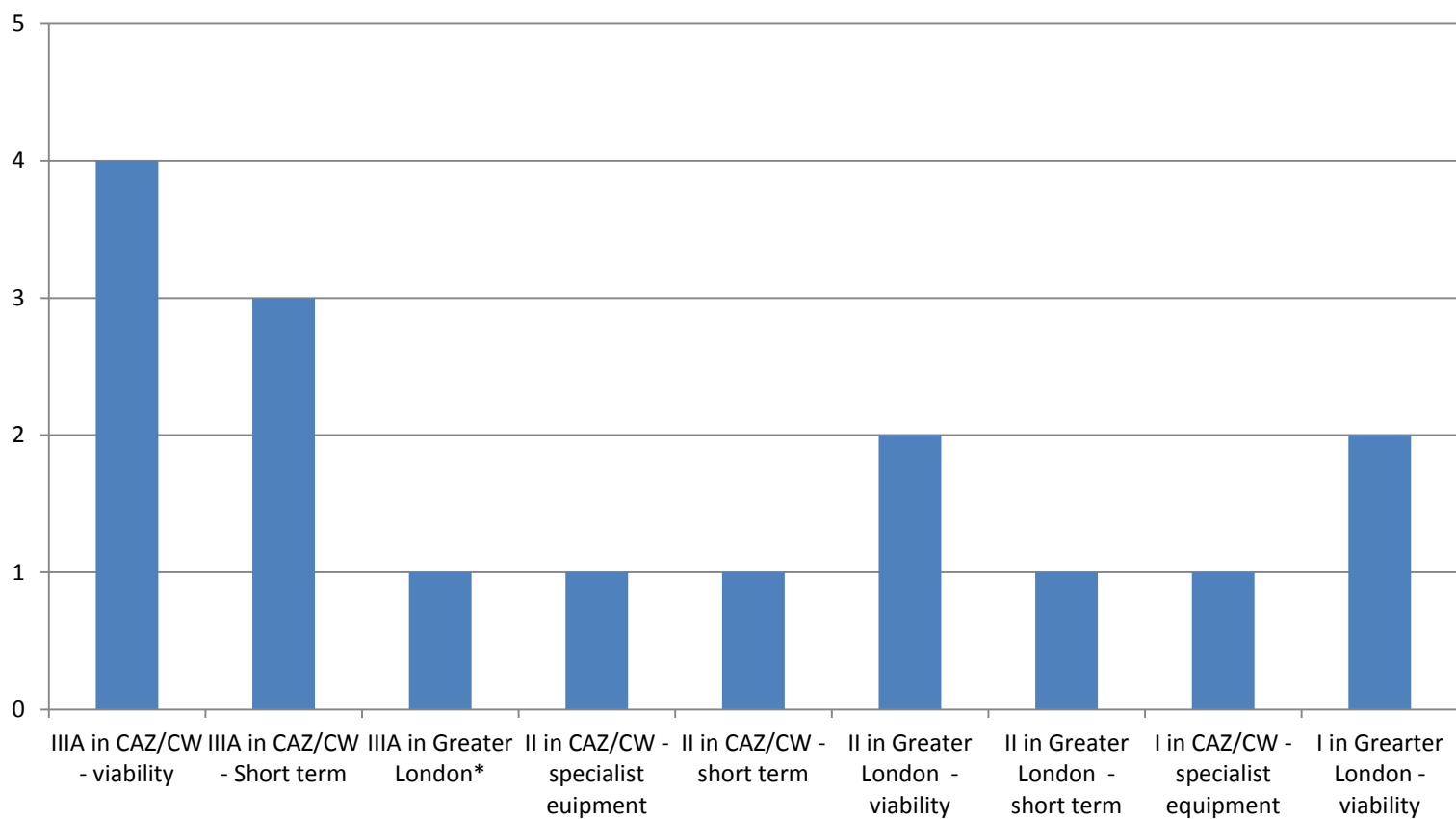
TBC for Late October 2016.

**Appendix 1: Exemptions – Summary**

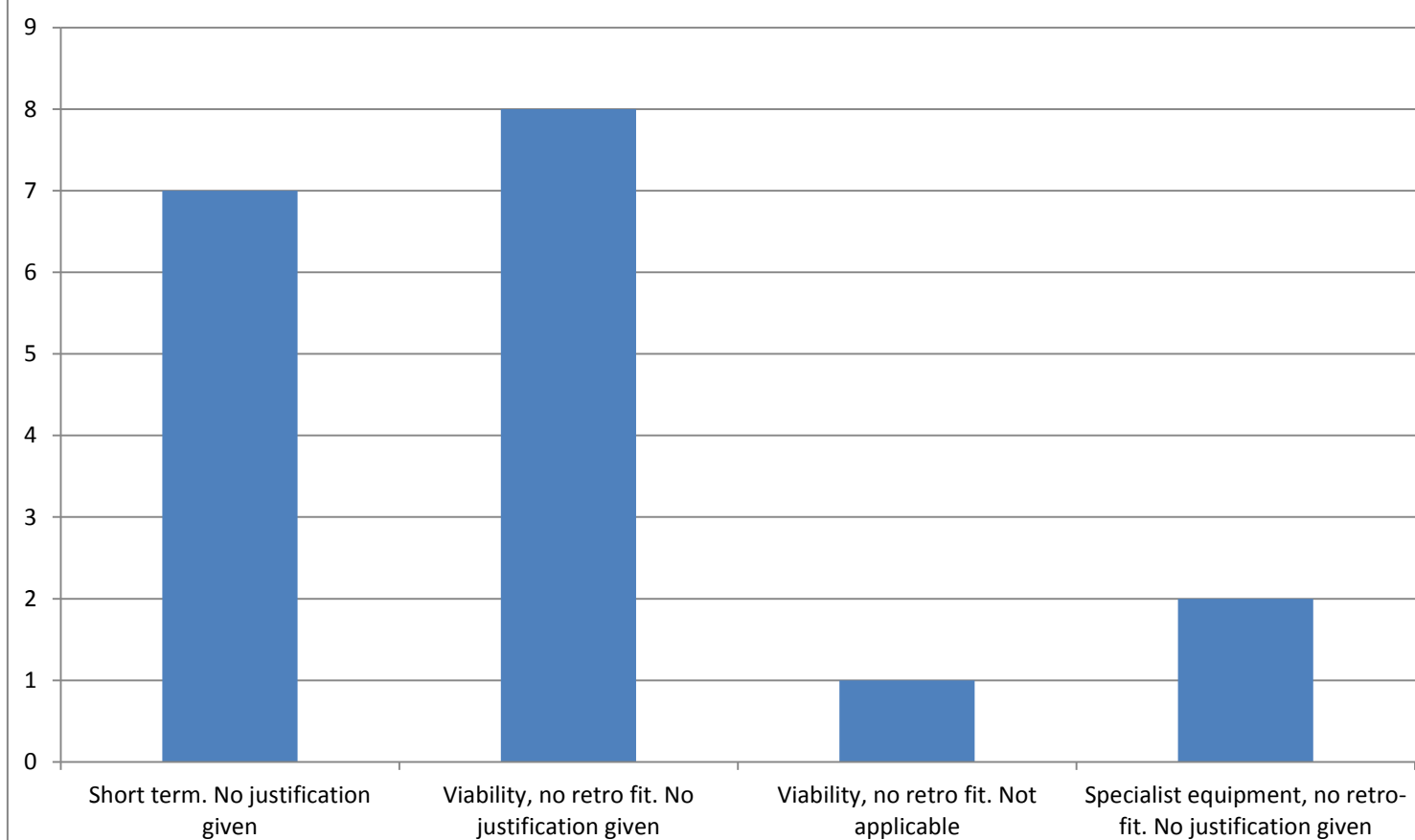




## Refused exemption types



## Refused exemptions - reasons



**Minutes**  
**Non Road Mobile Machinery (NRMM) Committee**  
**Friday 4<sup>th</sup> November 2016**  
**14:00-16:00**  
**Room 4.7W City Hall, The Queens Walk, London SE1 2AA**

**Attendees:**

[]

**Apologies:**

[]

**Chair and Secretariat:** []

**1. Minutes of previous meeting**

Minutes of the previous meeting were approved.

**2. Update on NRMM website and registry**

**DM** presented statistics on use and contents of the NRMM register.

- Local authority membership is growing and, although not every local authority is a member, once shared services are taken into account now covers the majority of London.
- Both the number of registered sites and the amount of registered equipment is growing.
- However still only 136 out of 435 sites have registered equipment.
- The diversity of equipment is growing – suggesting that knowledge of the breadth of the definition of NRMM is growing.
- Retro-fit statistics were also provided.

**CS** – EST maintains a log of retro-fit that has more entries on than our register.

**ML** – Can all fitted/approved retro-fit be registered as lots of retro-fit not on the system? This would help tracking and enforcement.

**JT/CS** – All approved retro fit receives an approval number that relates to the serial number, so traceability is possible.

**ML** – Incorporation of a retro fit register on the NRMM website could help encourage companies to sign up for accreditation.

**Action:** **CS** to send **DM** copy of retro-fit tables  
**DM** to explore if these can be simply incorporated into the NRMM website

**ML** - Some of the retro-fit on the register is not of an approved type. Specifically Diesel Oxidation Catalysts

**CS** – confirmed that no DOCs have been approved

**SI** – said that he checks all exemption requests with retro-fit against the EST register. Three requests have so far been refused on that basis.

**Action:** Diesel Oxidation Catalyst to be taken off from down list of retro-fit on website  
**SI** to circulate detailed breakdown of exemptions and retro-fit with these minutes

### **3. Positive recognition scheme**

**KF** gave a presentation on the proposed outline for a positive recognition scheme to be called “Clean Machines”. The presentation slides are appended to these minutes.

The scheme presented would award companies a Gold, Silver or Bronze award based on the overall performance of the fleet at depot or company level. An outline of the possible standards for Gold, Silver and Bronze was included in the presentation.

**PW** - asked if the standard for Bronze just mirrored compliance with the CAZ standards.

With the present proposed structure only bronze and silver are available but after 2020 all fleets operating in London would be obliged to be at least Silver

More work is required around how the scheme is tied to emissions stages and equivalence (particularly regarding retro-fit and the need to ensure that retro-fit covers all relevant pollutants)

**CS** – said that the award would have to apply to a company’s whole fleet

**JT** – Said we would need to consider what plant and retro-fit was available to ensure that the award standards were attainable.

**KM** - asked if we had considered what incentivises plant companies and manufacturers throughout the supply chain. The incentive is to provide a better product. He offered to liaise with **KF** outside of this meeting to further develop this idea to broaden out the scheme.

**DM** – said that it would preferable to have a site based award rather than a fleet based award as this would be able to support wider best practice in controlling emissions from construction sites.

If you only put a sticker on the plant itself no-one would see it except for the operators.

Sites would give more value to something more public facing.

**ML** – noted that any approach may need to be broadened out if there are new changes at a national level as a result of the Client Earth judgment.

The current scheme is encouraging but are we pushing the boundaries?

Should we be considering performance based criteria as a way of pushing innovative solutions such as hybrid generators?

The name 'clean machines' isn't air quality focussed; he would like to see something more explicitly about clean air and with a link to Clean Air Zones.

The scheme should link up fleets and sites; the current idea may be part of a wider positive recognition.

**NW:** Ecostars for HGV fleets could provide a good model as it is flexible to different sizes of fleet and has evolved in use.

**SI:** The discussion will be helpful in working out a scheme in more detail.

Once we have worked out some of the detail we will undertake some pilot assessments to check that we have set the levels for Gold, Silver and Bronze appropriately to be challenging but not impossible.

**Action:** **KF** and **KM** to liaise to discuss how positive recognition could be reflected across the supply chain

**SI** and **KF** to develop the scheme in more detail and start a pilot  
To provide **SI** and **KF** with a contact at Ecostars

**All:** To feedback any further thoughts on how the scheme could be developed to **SI**

#### **4. Update on Enforcement officer projects**

**LR** provided a brief update of progress with the GLA funded enforcement officer project in North London. The project includes Barnet, Enfield, Haringey and Waltham Forrester.

An officer has now been recruited and will be taking up their post in January. The officer has an environmental health background.

The relevant planning conditions are now being put in place and the officer will use planning powers to enforce.

At present only 26 sites have registered across the four boroughs.

**SI** read out a summary of the GLA funded enforcement officer project in South London. The project covers: Merton, Sutton, Bromley, Richmond, Wandsworth, Kingston, Kensington and Chelsea, Hammersmith & Fulham, Southwark, Lambeth and the City of London Corporation

Key points were:

- Lists of sites from all boroughs supplied & cross referenced with the NRMM register, approx 30 sites per borough and growing.
- On site awareness of NRMM is about 50%
- Non registered sites are being picked up during visits, this needs to be addressed long-term
- Some site inspections are not always possible due to safety restrictions, such as asbestos stripping/high working equipment, this has been largely resolved by asking contractors to photograph inspection plates.
- The best selling point for the NRMM agenda and one met with the best responses is safety of workers and local pollution effects (rather than simply compliance)
- Some imported equipment doesn't have a Type Approval Number
- Around 30 inspections with some 10-15% found non-compliant.
- They would like to produce some leaflets and guidance and certificates but would need a steer from the panel.

**ML** – Raised concerns from EIC members that there isn't sufficient audit or enforcement on sites.

This is leading to suspicion that some sites are getting away with non-compliance

More auditing is needed and a demonstration of willingness to formally enforce on non-compliant sites.

Enforcement should be at the top of the agenda in future meetings, and elevated in practice.

**SI** – noted that as well as the funded projects Croydon, Islington and Westminster are directly resourcing enforcement and a number of other boroughs are integrating it into existing enforcement practices.

From next year boroughs will be obliged to report on how many times the relevant planning conditions are being imposed. These reports are part of the London Local Air Quality Management Framework and be publicly available.

In practice planning powers may be difficult to use, and the GLA have asked government for more appropriate powers. It is also not clear how an undischarged condition (i.e. where the site has not complied) will work as a liability on the site after completion.

## **5. Generator PEMS testing**

**DM:** Recent PEMS testing of generators at Speedy Hire depot in Erith was a success in terms of gathering data. The results are now being analysed.

This will feed into further working including the PHD student funded to research real world emissions from NRMM and the development of a test cycle for SCR/DPF systems for generators.

**ML** – Development of a generator retro-fit test cycle is warmly welcomed by the EIC.

**SI** - asked if either the GLA or the Committee can help speed up the finalising of the test cycle?

**ML** – Suggested a sub-committee to finish off this work **RP** offered to take part in this sub-committee.

**Action:** **DM, CS, RP** liaise to finalise the generator retro-fit test cycle as soon as possible  
**DM, RP** to convene the relevant sub-committee

## **6. EIC members concerns**

**ML:** Members of the EIC have concerns about exemptions being given and the ability to challenge them, Generators, Retrofit and Enforcement

Most of these topics have been covered previously in the meeting. However the concerns are not fully resolved.

**Action:** **SI** to ensure that enforcement and retro fit are placed at the top of the agenda for future meetings

## **7. AOB**

The committee note that the stage V emissions limits have now been announced by the EU and will come into effect in phases from 2019.

## **8. Date of next meeting**

Provisional date of the next meeting 23<sup>rd</sup> February 2017. **SI** to confirm by end of January 2017 if there is sufficient progress on positive recognition or enough other matters arising to convene at that date or if it should be pushed back.

## **NRMM Committee Meeting 23/01/2018**

**London Fire Brigade Offices, 169 Union St, London SE1 0LL: Meeting Room F**

### 1. Welcome and introductions

Apologies from [] and [].

### 2. NRMM website

- This is the version 2 website. There has only been positive feedback from end users since the update
- Further updates are due as there have been no front-end updates for almost a year
- The original concern was that compliance would be skewed to larger developments with more resource to bring in cleaner machinery. This has not proven to be the case
- One avenue for enforcement would be for compliance officers to check where a site is registered but no machinery has been registered

**Action: [] to provide list so that GLA can follow up with boroughs where no sites are registered.**

- The majority of equipment used in London is Stage IIIB – even in Greater London. There is good uptake of Stage IV as well
- Individual company inventories are commercially sensitive so it is difficult to obtain data

**Action: [] to provide breakdown of plant that has been granted exemptions (esp. live exemptions)**

- >50% of plant in Greater London is Stage IIIB, 15% is Stage IV
- The most commonly-registered type of plant is excavators

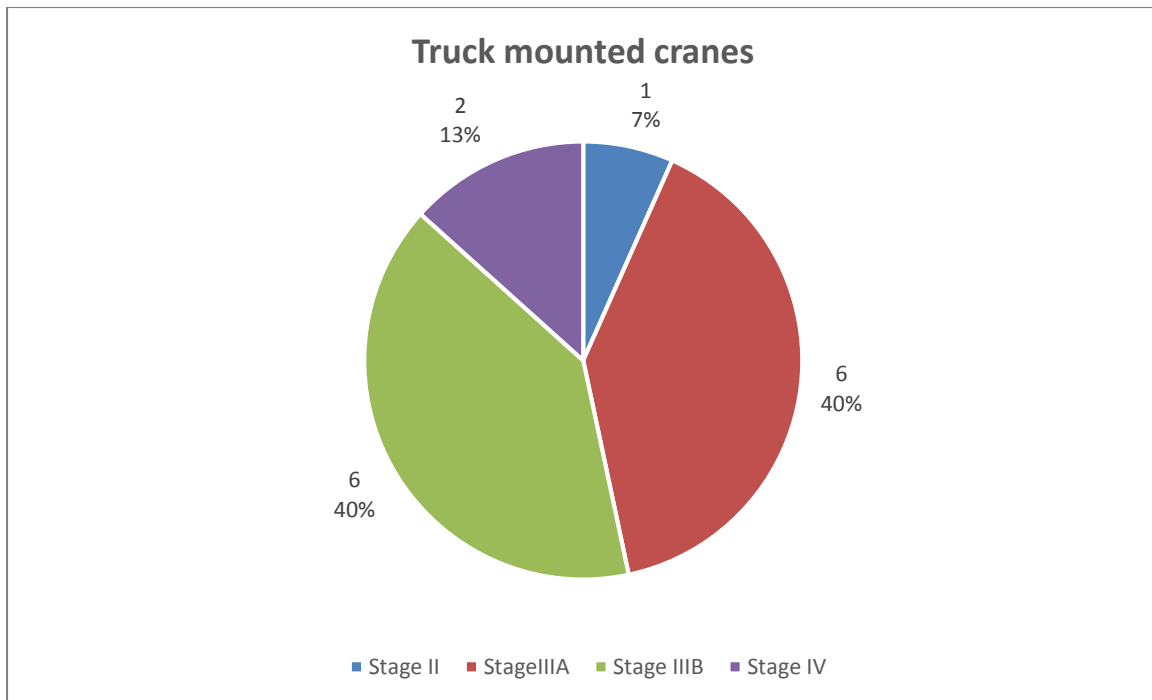
### 3. London Environment Strategy – update on timeline

- Responses have now been received and the consultation on the draft strategy is closed. The final strategy is due to be published later in 2018.

### 4. Exemption policy review – principles for change

- Three principles for review:
  - Block exemption for truck mounted cranes will be lifted

Truck mounted cranes: 15 on register. One (IIIB) currently in use



**Action: [] to provide rationale / justification to challenge the above and retain block exemption.**

- Refine exemption for generators

Current wording means that exemption requests come through for Stage II generators. This is not acceptable.

**Action: members to provide rationale and justification for redefining block exemption of generators post 2020.**

- Membership of the committee

Committee members suggested including the following bodies:

- Build UK
- Thames Tideway
- Crossrail 2
- Port of London Authority

## 5. SCR retrofit – update for on-road standard (

- JAQu have commissioned LowCVP and EST to develop Clean Vehicle Retrofit Accreditation Scheme
- National scheme designed to avoid fragmentation under different metropolitan authorities



- All vehicles fitted with adaptation shall have capability to provide information about satisfactory operation
  - Via on board diagnostics
  - Via remote diagnostics

## 6. Retrofit approvals ()

- Two concerns from EIC members:
  - Process of retrofit approvals – cost / time
  - Designation of retrofit options i.e. does the current system hinder innovation around alternative fuels etc

**Action: [] to send GLA further details on concerns from EIC members.**

**Action: [] to set up meeting with EST and EIC to discuss the concerns and address possible solutions.**

## 7. AOB

*Defra NRMM working group update*

- Data is extremely limited, particularly population data
  - More is needed to improve model accuracy
- Defra looking for suggestions around emissions reductions and enforcement issues