

Consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies

Section 1/6: Introductory Questions	
<p>A. Are you responding to this consultation as an individual or on behalf of an organisation? -single choice reply-(compulsory)</p>	On behalf of an organisation
<p>A1. What type of organisation do you represent? -single choice reply-(compulsory)</p>	NGO, civil society, environmental group or charity, consumer group
<p>A1a. Please specify the sector of your activity (e.g. health, environment, transport, energy, multi-sector): -open reply-(optional)</p>	Health NGO representing people with allergy and airways diseases (and therefore particularly interested in environmental issues, and especially in the topic of air pollution)
<p>A2. Does your organisation work mainly on an EU-wide basis or in a single country? -single choice reply-(compulsory)</p>	EU-wide
<p>A3. Please indicate the country where your organisation is located: -single choice reply-(compulsory)</p>	Belgium
<p>A4. Please indicate the name of your organisation: -open reply-(compulsory)</p>	EFA (European Federation of Allergy and Airways Diseases Patients' Associations)
<p>A5. Please indicate your name and title: -open reply-(compulsory)</p>	Roberta Savli - EU Policy Officer
<p>B. Do you now work on air pollution issues, or have you done so in the past? -single choice reply-(compulsory)</p>	Yes, air pollution has been one issue in my professional work
<p>D. Please feel free to provide any further details regarding your answers to the introductory questions: -open reply-(optional)</p>	
<p>Air is especially harmful to people who already suffer from lung diseases: not only because may a poor air quality result in increased risks, especially for children, of developing asthma and respiratory allergies; but also because people with respiratory diseases are the first to react (initial sensitisation) and their symptoms may worsen (exacerbation) in case of poor air quality. Patients with asthma, and especially children, suffer more on or after days with higher pollution levels. These vulnerable people are more responsive than others to all kinds of pollutants and at an increased risk of experiencing harmful effects from exposure to air pollution. The health effects due to air pollution can be devastating and can lead to a reduced quality of life.</p>	
<p>Unless you specify otherwise, your contribution will be published on the Commission's website. Please indicate here if you wish your contribution to be anonymous.(For full information please refer to the Specific Privacy Statement point 3) -single choice reply-(compulsory)</p>	You can publish this contribution as it is.
Section 2/6: Ensuring compliance with EU air quality requirements and coherence with international commitments in the short term	

1. How should the EU modify or supplement its approach to ensure compliance with current air quality legislation? (Please choose one or more responses) -multiple choices reply-(compulsory)	Strengthening emissions controls: for example more stringent emissions ceilings or source controls that support the attainment of air quality limit values
1c. Which options should be considered to set more stringent obligations on air pollution emissions? (Please choose one response) -single choice reply-(compulsory)	Combine, in a matched approach, more stringent national ceilings under the NEC Directive with more stringent source controls at EU level
1d. What further level of ambition (if any) should the revised NEC Directive aim for in 2020? (Please choose one response) -single choice reply-(optional)	The NEC Directive ceilings for 2020 should go beyond the 2020 Gothenburg ceilings and the Thematic Strategy on Air Pollution in order to support further objectives for air pollution reduction, including supporting the attainment of air quality limit values
2. Please feel free to provide written comments on the course of action to ensure compliance with the current air quality legislation: -open reply-(optional)	

Section 3/6: Further reducing exposure to damaging air pollution in the medium to long term

Sub-section 3.1: Ensuring coherence between air pollution and climate change policies

3. How should future EU air pollution policy interact with a new climate and energy framework for 2030? (Please choose one response) -single choice reply-(compulsory)	It should maximise the synergies between the policies, and set out additional measures to reduce air pollutant emissions and improvements to air quality
4. Should specific complementary action in the EU be pursued to curb emission of short-lived climate pollutants (SLCP) and their precursors, to improve both air quality impacts on health but also to boost climate mitigation in the short term? -single choice reply-(compulsory)	Yes
4a. Should specific complementary action be pursued to curb black carbon emissions? (Please choose one response) -single choice reply-(optional)	Yes (please describe below in question 5)
4b. Should specific action to address ozone precursors that are short-lived climate pollutants, such as methane, be reinforced? (Please choose one response) -single choice reply-(optional)	Yes (please describe below in question 5)
5. Please feel free to provide comments on the interaction between air pollution and climate change policies: -open reply-(optional)	

The link between air quality and climate change is evident and more coherent actions should be developed by the European Union. For us, fighting climate change is particularly important because several studies show that ultimately the reduction of greenhouse gas emissions is related to the decrease of health costs and the improvement of the quality of life of people in Europe. In particular, if the

target of reduction of GHG emissions moves from 20% to 30% by 2020, the EU will save up to 7.9 billion EUR annually in terms of avoided health costs. In addition, global warming is extending the pollen season, and therefore it severely affects people with respiratory allergies. Hot nights prevent recovery from high daytime temperatures and have further impacts on health, through the effects of sleep deprivation. High humidity impairs sweating, which helps people keep cool and this results in worsening for asthma patients.

Sub-section 3.2a: Strategic approach and target year of future air pollution policy

6. Which target year should be the main focus of the revised Thematic Strategy? (Please choose one response) -single choice reply-(**compulsory**)

2025

Sub-section 3.2b: Strategic approach and target year of future air pollution policy

7. How much additional progress should EU air pollution policy pursue in the revised Thematic Strategy? (Please choose one response) -single choice reply-(**compulsory**)

The maximum achievable pollution reduction (MTFR)

8. Please feel free to provide comments on the level of ambition: -open reply-(**optional**)

Sub-section 3.3: Setting Priorities

9. How should EU air pollution policy give priority to addressing either human health or the environment? (Please choose one response) -single choice reply-(**compulsory**)

Equal weight to both

10. Please feel free to provide comments on setting priorities: -open reply-(**optional**)

Both the respect of the environment and the protection of Europeans' health should be the objectives of the EU strategy. Air pollution is responsible for half a million deaths each year in the European Union and it reduces the average life expectancy by more than 8 months per person. Every year, 3.6 million life years are lost due to the bad quality of the air people breathe. Compliance with stricter air quality standards (for example the WHO guidelines) would increase Europeans' life expectancy and produce 31.5 billion EUR in monetary health benefits every year (APHEKON project).

Sub-section 3.4: Choice of policy instruments

Negotiate new emission reduction commitments for 2030 under the Gothenburg Protocol which are aligned with the ambition level determined for the revised strategy. To be effective, this option would require action to ensure that EU neighbouring countries join and ratify the 2020 emission reduction targets. -single choice reply-(**optional**)

In the National Emissions Ceiling Directive, establish emission ceilings for the 2025-2030 period which are aligned with the ambition level determined for the revised strategy. -single choice reply-(**optional**)

In the Ambient Air Quality Directive, adapt the AQ limit values for the 2025-2030 period to more stringent levels corresponding to the ambition level determined for the revised strategy.

-single choice reply-(optional)	
In EU legislation on emission sources, set more stringent emission requirements for industrial activities, motor vehicles and other air pollution sources, where cost-effective. -single choice reply-(optional)	
Use non-legislative methods, such as existing EU funding schemes, urban air quality programmes, research and innovation actions or awareness raising (please specify in following question). -single choice reply-(optional)	2
Other instruments (please provide comments in question 12). -single choice reply-(optional)	1

12. Which other instruments should be used? -open reply-(optional)

Section 4/6: Revising the Ambient Air Quality Directive

Sub-section 4.1a: Aligning with latest scientific and technical knowledge

13. Should the indicative limit value for PM _{2.5} of 20 µg/m ³ for 2020 be made mandatory? -single choice reply-(compulsory)	Yes
14. Should the PM _{2.5} or other limit values in the AAQD be made more stringent to bring them closer to WHO guidance values? (Please choose one response) -single choice reply-(compulsory)	Yes, review the limit values and bring them closer to WHO guidance values

Sub-section 4.1b: Aligning with latest scientific and technical knowledge (black carbon)

15. Should monitoring and regulation be introduced for black carbon/elemental carbon? (Please choose one response) -single choice reply-(compulsory)	Yes, introduce binding limit value (along with a monitoring requirement)
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16. Should any other components of particulate matter be addressed in the AAQD?
-open reply-(optional)

Sub-section 4.1c: Aligning with latest scientific and technical knowledge (ozone)

17. Which binding limit values (if any) should the AAQD set for ozone? (Please choose one response) -single choice reply-(compulsory)	Replace the current ozone target values with binding limit values set at more stringent levels
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Sub-section 4.2a: Management framework

18. Should any limit values be removed from the AAQD? If so, which? -open reply-(optional)

No

Sub-section 4.2b: Management framework

19. Should any *other* monitoring and reporting obligations be reduced in the AAQD? If so, which? -open reply-(optional)

No

Sub-section 4.2c: Management framework

20. Should zone-specific plans be consolidated into coordinated national plans? (Please choose one response) -single choice reply-(compulsory)

Yes

21. Should cooperation among Member States be reinforced to better address transboundary pollution flows that affect local air quality problems? (Please choose one response) -single choice reply-(compulsory)

Yes, the Member States concerned should be legally obliged to prepare joint air quality plans in cases of significant transboundary pollution

22. Please feel free to provide comments on the options for the revision of the AAQ Directive: -open reply-(optional)

Section 5/6: Revising the National Emission Ceilings Directive (NECD)

Sub-section 5.1: Aligning with latest scientific and technical knowledge

23. Should national emission ceilings be adopted for black carbon/elemental carbon? (Please choose one response) -single choice reply-(optional)

Yes

24. Should national emissions ceilings be introduced for other new pollutants? (Please provide written comments if you would like to propose ceilings for other pollutants) -open reply-(optional)

Ceiling for methane

Sub-section 5.2a: Management framework

25. Which mechanisms for flexibility should be introduced into the NEC Directive management framework? (Please choose one or more responses) -multiple choices reply-(optional)

No flexibility mechanisms should be introduced

Sub-section 5.2b: Management framework

26. Should coordination be required between the national and local levels in respect of emissions reduction measures and local air quality management? (Please choose one response) -single choice reply-(compulsory)

Yes

27. Please feel free to provide comments on the options for the revision of the NEC Directive:

-open reply-(optional)

Section 6/6: Addressing major air pollution sources

Sub-section 6.1: Road transport

Introduce with minimum delay the new test procedure to ensure that real world emissions of Euro 6 light duty diesel vehicles are as close as possible to the type approval limit values

-single choice reply-(optional)

Strengthen EU-wide requirements for in-service compliance with emissions standards, to ensure that light-duty vehicles on European roads continue to produce low emissions over their lifetime

-single choice reply-(optional)

Develop a new, more stringent standard to be mandatory for motor vehicles after 2020

1

-single choice reply-(optional)

Develop a supplementary more stringent standard, not mandatory, to be used by national and local governments in a harmonised way wherever air quality exceeds EU standards (e.g. to establish low emission zones), or to establish incentives at MS level to increase penetration of cleaner vehicles

-single choice reply-(optional)

Introduce standards to retrofit existing heavy duty vehicles (e.g. trucks, buses) to reduce their air pollution emissions

-single choice reply-(optional)

Introduce a mandatory road charging scheme for heavy duty vehicles that incorporates air pollutant emissions ("eurovignette directive")

-single choice reply-(optional)

Develop additional test-cycle components specific to the driving patterns of special purpose urban vehicles (e.g. buses and refuse collection vehicles), to ensure that pollution control technologies operate effectively under real urban driving conditions

-single choice reply-(optional)

Other (please provide comments in question 29)

-single choice reply-(optional)

No additional measures should be introduced

8

-single choice reply-(optional)

Don't know

-single choice reply-(optional)

29. Please feel free to comment on your answers regarding regulation of road transport emissions: -open reply-(optional)

Sub-section 6.2: Off-road transport and non-road machinery

Extend the scope of application of current Stage IV NRMM standards to additional power classes and applications, including stationary applications -single choice reply-(optional)	
Introduce as soon as possible a more stringent Stage V standard for non-road machinery, aligned with the limit values of the most stringent Euro VI regulation for heavy duty road vehicles, which would further reduce especially PM emissions. -single choice reply-(optional)	
Ensure that approval emission tests reflect the machinery's emissions in real world circumstances -single choice reply-(optional)	
Ensure that there are incentives for retrofitting and/or replacing older inland waterway vessels' engines by newer and cleaner ones -single choice reply-(optional)	
Other (please provide comments in question 31) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	
Don't know -single choice reply-(optional)	5
31. Please feel free to comment on your answers regarding regulation of emissions from off-road transport and non-road machinery: -open reply-(optional)	

Sub-section 6.3: Agricultural sector

Set tighter emission ceilings for ammonia for 2020 and 2030 in the NEC Directive, leaving flexibility to Member States on how these ceilings can best be reached -single choice reply-(optional)	
Where cost effective, introduce new or revise existing EU legislation to establish EU-wide specific rules for e.g. improved manure storage, management and spreading techniques -single choice reply-(optional)	1
Promote good practices in manure management and manure spreading in Member States through support from the Rural Development Fund -single choice reply-(optional)	
Introduce measures to ban or restrict the burning of agricultural waste -single choice reply-(optional)	

Other (please provide comments in question 33)

-single choice reply-(optional)

No additional measures should be introduced 5

-single choice reply-(optional)

Don't know -single choice reply-(optional)

33. Please feel free to comment on your answers regarding regulation of emissions from the agricultural sector: -open reply-(optional)

Sub-section 6.4: Small/medium combustion sector

34. Which additional measures should be taken to address air emissions from small and medium combustion installations (below 50 MW)?

(Please choose one or more responses) -multiple choices reply-(optional)

Develop a supplementary and more stringent standard for installations below the Ecodesign capacity threshold for use in national and local measures such as fiscal incentives to be applied in zones that are in non-compliance with air quality limits - Regulate combustion installations above the Ecodesign capacity threshold but below the 50MW threshold set in the Industrial Emissions Directive (IED)

Sub-section 6.4: Small/medium combustion sector (continued)

34a. Which measures should be introduced to control emissions from combustion installations above the Ecodesign threshold but below 50 MW? (Please choose one or more responses)

-multiple choices reply-(optional)

Don't know

35. Please feel free to comment on your answers regarding regulation of emissions from the small/medium combustion sector: -open reply-(optional)

Sub-section 6.5: Shipping sector

36. Which additional measures should be taken to address air emissions from the shipping sector? (Please choose one or more responses)

-multiple choices reply-(optional)

Promote the extension of the Sulphur Emission Control Areas to additional EU sea areas such as the Irish Sea, the Gulf of Biscay, the Mediterranean and/or the Black Sea provided that such a measure is cost-effective. - Promote the designation of NOx Emission Control Areas in EU regional seas where cost-effective (those listed above and/or the Baltic and the North Sea including the English Channel) provided that such a measure is cost-effective. - Introduce requirements for PM emission controls in EU regional seas where cost-effective - Reduce air pollution and greenhouse gas emissions from ships in EU waters by setting speed restrictions. - Aim for a reduction of total NOx emissions from shipping by retrofitting all vessels with NOx

abatement equipment. - Require continuous monitoring of the emissions of sulphur dioxide, NOx, particulate matter (fine dust) as it is practised on many industrial installations on land.

37. Please feel free to comment on your answers regarding regulation of emissions from the shipping sector: -open reply- (optional)

Final comments

38. Please feel free to provide any further comments related to the revision of the Thematic Strategy on Air Pollution: -open reply-(optional)

As previously underlined, EFA is particularly concerned by the levels of air pollution in Europe, both inside and outside. On the one hand, living near polluted roads could be responsible for about 15-30% of all new cases of asthma in children; and of chronic obstructive pulmonary disease (COPD) in adults 65 years of age and older. On the other hand, EU citizens spend the majority of their time indoors and a poor quality of the air they breathe inside is responsible for respiratory diseases, and especially asthma. As a consequence, the EU Year of Air and the revision of the Thematic Strategy are key opportunities to improve not only outdoor air quality, but also provide for cleaner air indoors. In the revision of the Thematic Strategy the Commission needs to outline the way forward for a specific EU strategy on indoor air quality to ensure that health impacts from air pollution are reduced indoors as well. Indeed, poor indoor air quality is mistakenly believed to be a problem that concerns only a limited number of people in Europe and a private problem (regarding for example dwellings and individual behaviours). Therefore, no proper legislative text has been adopted on the issue thus far. However, a common comprehensive and urgent response should be developed, based on the recognition that outdoor and indoor air is basically the "same air". We urge the Commission to make indoor air quality a greater policy priority and to issue a strategic view on this important issue for the health of European citizens to identify the gaps and next steps to tackle the negative consequences of a poor indoor air quality.