

Urban Agenda - Air Quality Public Feedback

Fields marked with * are mandatory.

Objective of the Stakeholder Public Consultation

1. Key information on the Partnership “Air Quality”

During the Dutch Presidency of the EU in the first half of 2016 the Pact of Amsterdam was adopted by EU ministers of the Interior. It states that European cities will be more involved with the creation of EU legislation, EU funding and knowledge sharing. The relevance of this involvement is highlighted by the statistics that cities and urban areas now house more than 70% of all Europeans.

The Urban Agenda is composed of 12 priority themes essential to the development of urban areas. Each theme has a dedicated Partnership. These partnerships bring together cities, Member States and European institutions. Together, they aim to implement the Urban Agenda by finding workable ideas focused on the topics of EU legislation funding and knowledge sharing. One of the partnerships is the Partnership on Air Quality.

Members of the Partnership

- Member States: The Netherlands (coordinator), Croatia, Czech Republic, Poland;
- Cities: Helsinki/HSY (FI), London (UK), Utrecht (NL), Milan (IT), Constanta (RO), and Duisburg (DE - Representing the Consortium Clean Air Ruhr Area);
- Stakeholders: EUROCITIES, HEAL (Health and Environment Alliance);
- European Commission: DG Regional and Urban policy (coordinator), DG Environment, DG Research & Innovation, DG Agriculture, DG Growth, the Joint Research Centre (JRC).

The Partnership is also actively supported by the URBACT programme, which has an observer status.

Focus areas and activities

The main objective of the Partnership for Air Quality is to improve air quality in cities and to bring the ‘healthy city’ higher on the local, national and EU agendas as part of the Urban Agenda. This is being done through improving regulation and the implementation of regulation, funding mechanisms and knowledge at all levels, as well as the coordination between them.

Currently there are many cities which have difficulty complying with the air quality standards as set by the EU, rendering their environment unhealthy for EU citizens. The Partnership for Air Quality, therefore, tries to explore the gaps, overlaps and contradictions in existing regulations and map out the resources and available funding put in place to assist cities improve air quality. In addition, through the Partnership for Air Quality, cities have the chance to exchange knowledge and share the best practices currently being

implemented in cities around Europe, their surrounding regions and across Member States.

To frame its work, the Partnership has already developed a [background document on Findings](#), identifying the relevant issues regarding urban air quality, which were based on the input of the different partners during several meetings, in-depth research, surveys and scoping papers from December 2015 until the first half of 2017, an international Stakeholder Workshop organized in London in June 2017 and an informal stakeholder consultation launched during summer to gather inputs from stakeholders.

The Partnership is now developing a plan based on the evidence gathered so far, which consists of the following recommendations and actions:

BETTER REGULATION AND IMPLEMENTATION

- RECOMMENDATION N°1 – IDENTIFICATION OF GAPS IN REGULATIONS ON AIR POLLUTANT EMISSION SOURCES
- ACTION N°1 – BETTER AIR QUALITY PLANNING (GOVERNANCE)

BETTER FUNDING

- ACTION N°2 – BETTER TARGETED FUNDING FOR AIR QUALITY

BETTER KNOWLEDGE

- ACTION N°3 – BETTER FOCUS ON PROTECTION AND IMPROVEMENT OF CITIZENS' HEALTH
- ACTION N°4 – AWARENESS RAISING AND KNOWLEDGE SHARING
- ACTION N°5 – OUTREACH.

2. Purpose of this Stakeholder public consultation

As a relevant stakeholder of the Partnership for Air Quality, through this open public consultation you have the chance to significantly contribute to the finalisation of the Partnership's recommendations and future actions.

The results of this online Public Feedback will be taken into consideration by the Partnership on Air Quality for the preparation of an Action Plan, which will be presented on 26 October 2017 to the DG meeting on Urban Matters (Directorate-Generals responsible for urban matters in their Member States, the European Commission, the Committee of the Regions, CEMR and EUROCITIES).

The individual contributions to this Public Feedback will not be published on the Internet.

THANK YOU IN ADVANCE FOR YOUR COLLABORATION!

3. Target group(s)

Contributions are sought from individuals and national authorities, intergovernmental and non-governmental organisations, social partners and civil society, academic institutions, financial institutions, international organisations, EU Institutions and Agencies, based in EU Member States or third countries.

4. Period of the online Public Feedback

From 29/09/2017 to 13/10/2017.

5. How to submit your feedback

You can contribute to this Public Consultation by filling out the online questionnaire, available hereafter.

You may find it useful to refer to the [background documents](#) (Document on Findings and Draft Document on Actions and Recommendations) which are published alongside this consultation.

Individual contributions to this Public Feedback will not be published on the Internet. Answers to the online questionnaire will be taken into account by the Partnership as input to a revised version of the Action Plan, which will be published on Futurium before the end of 2017.

Replies may be submitted in English.

6. Reference documents and websites

1. [Background Document on Findings](#)
2. [Draft Document on Actions and Recommendations](#)
3. [Pact of Amsterdam](#)
4. [Futurium – section dedicated to the Partnership on Air Quality](#)

7. Disclaimer

The information and views contained in the online open stakeholder public consultation are those of the Partnership and do not reflect the official opinion of the European Commission nor that of the Partners. The Commission and the Partners do not guarantee the accuracy of the information contained therein. Neither the Commission or the Partners nor any person acting on the Commission's behalf or on the Partners' may be held responsible for the content and the use which may be made of the information contained therein.

8. Contact details

Secretariat of the Urban Agenda, Communication team

E-mail: UA.communication@ecorys.com

Start

*1. Are you responding as an individual?

- Yes
 No

*2. Are you responding on behalf of an organisation?

- Yes
 No

2.a. Name of your organisation? (this information will be kept strictly confidential by the Partnership)

1000 character(s) maximum

***3. Profile of respondent?**

Non-governmental organisation

***4. Country?**

Belgium

5. Email (to be provided if you wish to be kept informed about the future activities of the Partnership on Air Quality. This information will be kept strictly confidential by the Partnership)

roberta.savli@efanet.org

THEME 1: Better Regulation and Better Implementation

RECOMMENDATION 1 - IDENTIFICATION OF GAPS IN REGULATIONS ON AIR POLLUTANT EMISSION SOURCES

What is the specific problem?

Air quality is a complex issue requiring pollutants and sources control at EU level and effective implementation at national and local level. It requires coordinated efforts at national, regional and local level.

The overall air policy strategy of the EU is directed towards meeting the Air Quality Guideline Values of the WHO in the coming decades (EAP7). At the EU level six instruments dominate:

- i. The Ambient Air Quality Directive(s): Maximum concentrations to be attained across the EU (SO₂, NO₂, PM₁₀, benzene, lead, CO, O₃, arsenic, cadmium, nickel, PM_{2.5} and BaP), , including an obligation to further reduce the average exposure of the urban population to PM_{2.5} + Directive EU /2015/1480;
- ii. The National Emission Ceilings Directive (NECD): i.e. National emission inventories and caps to limit transboundary pollution (SO_x, NO_x, NMVOC, and NH₃);
- iii. Source-specific performance standards: Euro and fuel standards, energy efficiency standards, Industrial Emissions Directive, Ecodesign directive, Directives aimed at vehicles and non-road machinery, Directive relating to a reduction in the sulphur content of certain liquid fuels etc. that define emission limit values for NO_x, PM_{2.5}/PM₁₀ and precursors of PM_{2.5} and ozone for new and existing installations, vehicles, products, etc.. Directive on deployment of alternative fuels infrastructure that requires MS to make publicly available electric charging points, hydrogen, LNG and CNG refuelling stations, in order to speed-up deployment of less polluting vehicles.

iv. Monitoring and reporting requirements and requirements to inform the public on emissions and (actual and expected) air quality.

And additionally two other (non-regulatory) instruments can be mentioned:

v. Funding mechanisms e.g. for innovative “green” or “smart” projects.

vi. Knowledge transfer, e.g. data, models and other tools for air quality planning, which can be used at the national, regional and local levels.

The main Member States’ main policy instruments are:

i. Air Quality Plans & Programmes (AAQD)

ii. National Emission Inventories, Projections, and Measures (NECD).

The Partnership’s analysis pointed out that EU and national regulatory instruments, and/or the way they are implemented, may not always ensure an adequate and timely reduction of the following sources of air pollution, which have a proven negative impact on the health of exposed populations, especially in urban environments:

- PM:

No regulation exists on black carbon and nanoparticles, which are far smaller than the regulated PM10 and PM2.5 particle classes, and are believed to have several more aggressive health implications than those classes of larger particulates.

- NO2:

There is wide uncertainty about the new Euro emissions limit values as regards to NOx and NO2 for diesel cars and their real emissions (failure of Euro Standards to control NOx emissions, e.g. specifically from Light Duty Vehicles (LDVs), and increased primary NO2 emissions from Euro6 vehicles, tampering (i.e. of particulate filters).

- Non-exhaust traffic-related particles:

Notably road, brake, clutch and tyre wear can contribute to relevant portion of total non-exhaust traffic-related PM10 emissions and of total traffic-related PM10 emissions in urban environments.

- Shipping[1]:

Air pollution from international shipping accounts approximately for 50,000 premature deaths per year in Europe, at an annual cost to society of more than €58 billion according to recent scientific studies[2]. Air pollution from ships continues to increase as the sector grows. Land-based emissions – SOx and NOx – on the other hand, particularly from fixed installations, have been reduced dramatically. However, NOx from shipping is set to exceed NOx from all EU land-based sources in the coming decade.

The Commission's 2011 White Paper on transport suggests that the EU's CO2 emissions from maritime transport should be cut by at least 40% from 2005 levels by 2050, and if feasible by 50%. However, international shipping is not covered by the EU's emissions reduction targets.

Inland shipping and the inland emissions from shipping and harbour activities is contributing to land-based emissions and exposure.

- Ammonia (NH₃) volatilization from manure application and from smaller cattle, pig and poultry farms: It contributes to the formation of secondary particulate aerosols, an important air pollutant due to its adverse impacts on human health[3].

- Mobile refrigeration units:

Although refrigerated vehicles make up a small proportion of the vehicles on the road, they are unregulated, use out-dated fossil fuelled technology and are disproportionately polluting due to poor maintenance, cycle beating at certification, aftermarket defeat devices that eliminate or bypass pollution reduction equipment. What's worse, that pollution is concentrated on city streets where it does the most damage to our health.

- Space heating and power:

Specifically referring to problems due to biomass use promotion as renewable fuel in climate protection legislation, but also coal, oil and gas heating.

[1] Sulphur content of fuel is well regulated in the Baltic Sea and the North Sea but not in the Mediterranean. Legislation for NO_x emissions on the North Sea and the Baltic Sea will come into force soon.

[2] <https://www.transportenvironment.org/members>.

[3] See also <https://www.eea.europa.eu/data-and-maps/indicators/indicators/eea-32-ammonia-nh3-emissions/eea-32-ammonia-nh3-emissions>.

What ideas for actions are recommended?

The Partnership identified some ideas for actions to tackle the problem described above, which are presented here below in two parts. The first set of ideas for actions include those focusing on better implementation; the second set focuses on aspects related to better regulation.

Better Implementation

- Encourage MS and local/regional administrations to adopt a continuous improvement approach to sources of PM and NO_x (as these are the two pollutants that many MS struggle to legally comply with), taking action wherever possible.

- Further investigate the possibility to improve coherence of cities' implementation approaches of Low Emission Zones (LEZs), either via access restrictions based on pollution levels of vehicle or based on EURO standards, or via road pricing, speed limits or reducing on-road parking facilities.

- Based on the Partnership's findings, provide input to EU level policy discussions; for example during the Fitness Check of the EU Ambient Air Quality Directives, and to promote additional actions for national governments to remove/retrofit old installations, and for local government to improve transport infrastructure (possibly liaising with the Urban Partnership for Mobility).

Better Regulation

- Set up a multilevel governance working group to tackle unregulated issues. Drawing on the findings of previous Partnership's work on WP1 and WP2, this working group should focus on the gaps in existing regulations on sources of pollution and air quality levels of pollutants, and propose ways for the EU/national legislation to stay relevant in the face of changing scientific evidence. The working group's method should be based on the principle of subsidiarity. First, when looking for solutions to mitigate the negatives impacts of pollution, it should begin from the local level. If that is not possible, the search for solutions should be escalated at regional level, then at national level, and so on up to the European level, until a suitable solution is found.
- The working group could additionally reflect on how to ensure that the further reduction of the conformity factor for RDE tests of NOx emissions, as provided for by Regulation (EU) 2016/646, and already agreed, can be enforced faster.

1. On a scale of 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent do you agree with the list of ideas for actions recommended in Recommendation 1 - IDENTIFICATION OF GAPS IN REGULATIONS ON AIR POLLUTANT EMISSION SOURCES?

- 1 – Not agree at all
- 2 – Somewhat disagree
- 3 – Neither agree nor disagree
- 4 – Somewhat agree
- 5 – Very much agree

1.a. Please briefly justify your score

1000 character(s) maximum

We agree with the above proposals, but we would also include the need to collaborate with WHO that is revisiting their guidelines and therefore include them in the better regulation/policy discussions.

2. Is there any other ideas for action not included in the list above that should be considered as priority for recommendations?

- Yes
- I do not know
- No

2.a. If yes, please explain what the additional ideas for action that should be considered are.

1000 character(s) maximum

See above our comment

Which partners are necessary to promote the recommendation?

Greater London Authority - Coordination

Europe (COM) - Expert input on better regulation

Europe (Eurocities, HEAL) - Expert input on better implementation and on better regulation

National/Regional (Partners and other MS/Regions) - Expert input on better implementation and on better regulation

Local (Partners and other cities) - Expert input on better implementation and on better regulation

3. According to your experience, which actors should be involved in the implementation of the recommendation?

1000 character(s) maximum

At all levels (EU, national, local), representatives of the most vulnerable groups (patients/women/children) should be involved as they know better than others what it means to be affected by air pollution, this would also give a human face to the problem, therefore contributing raising awareness, which is not yet at the needed level for politicians and the public at large.

4. Would you be interested in actively supporting the implementation of the recommendation?

- Yes
- I do not know
- No

4.a. If yes, how would you be able to contribute to the implementation of the recommendation?

1000 character(s) maximum

See above, EFA is an EU-wide umbrella organisation representing patients with respiratory diseases in 25 European countries.

ACTION N°1 – BETTER AIR QUALITY PLANNING (GOVERNANCE)

What is the specific problem?

Almost three quarters of Europeans live in cities, which remain the most immediate level of intervention in dealing with the threats to human health coming from pollutants such as nitrogen dioxide, particulate matter, and ozone.

However, “Air quality planning” in the EU is not always under the responsibility of cities, as the majority of Members States set the responsibility for drafting and adopting Air Quality Action Plans (AQAP) from Art. 23 of Directive 2008/50/EC[1] at regional or even at national level. In the meantime, the measures defined by the AQAP should address different sectors, whose enforcement and implementation are of competence of urban, regional or national authorities, as appropriate.

These elements raise two needs:

- i. to improve the coordination between different levels of governance (national regional, local) involved, respecting specific situations and the subsidiarity principle; and

- ii. to improve the coordination within cities between air, health, energy, transport and urban planning, taking into account the contributions that could come from the involvement of citizens in urban policy development.

Furthermore, the work of the Partnership has allowed to identify issues of concern for many cities relating to the development and implementation of Cities Air Quality Action Plans. Notably, it has been found:

- That access to knowledge and experiences (e.g. on process optimization, pitfalls, stakeholder interactions, governance, monitoring, etc.) from front-runners cities having already designed and implemented AQAPs is often crucial to avoid inefficiencies, and that such knowledge should be improved.
- Likewise, that knowledge of best practices in the selection, design, funding, and implementation of air quality measures is essential to facilitate the choice of the relatively most effective measures for the AQAPs, and that such knowledge should be improved.

[1] Article 23 - Air quality plans: 1. Where, in given zones or agglomerations, the levels of pollutants in ambient air exceed any limit value or target value, plus any relevant margin of tolerance in each case, Member States shall ensure that air quality plans are established for those zones and agglomerations in order to achieve the related limit value or target value specified in Annexes XI and XIV. In the event of exceedances of those limit values for which the attainment deadline is already expired, the air quality plans shall set out appropriate measures, so that the exceedance period can be kept as short as possible. The air quality plans may additionally include specific measures aiming at the protection of sensitive population groups, including children. Those air quality plans shall incorporate at least the information listed in Section A of Annex XV and may include measures pursuant to Article 24. Those plans shall be communicated to the Commission without delay, but no later than two years after the end of the year the first exceedance was observed. Where air quality plans must be prepared or implemented in respect of several pollutants, Member States shall, where appropriate, prepare and implement integrated air quality plans covering all pollutants concerned. 2. Member States shall, to the extent feasible, ensure consistency with other plans required under Directive 2001/80/EC, Directive 2001/81/EC or Directive 2002/49/EC in order to achieve the relevant environmental objectives.

Which action is needed?

The Partnership identified the following action to tackle the problem described above:

- Development of Code of Good Practice for Cities Air Quality Action Plans to ensure a consistent interpretation of the AQAP content listed under Art. 23 of Directive 2008/50/EU (Annex XV, Section A).
- Assemble and keep updated a register of examples of best practice in urban air quality planning, in order to encourage the dissemination of knowledge on relevant air quality measures and facilitate comparative analysis on their relative effectiveness.

How to implement the action?

1. Development and dissemination of a Code of Good Practices for Cities Air Quality Action Plans^[1] in cooperation with experienced cities. Expert input and reviewing can be provided by all partners.

2. Promote the dissemination of best practices in urban air quality planning between different governance levels (European/National/Regional/Urban), and between cities fostering the use of state-of-the-art methodologies, tools and data for air quality planning. This work could be carried out in cooperation with the Forum for Air Quality Modelling (FAIRMODE[2]).

[1] Note that in an exceedance situation air quality plans are mandatory (and not voluntary) – see Directive 2008/50/EC

[2] <http://fairmode.jrc.ec.europa.eu/>

1. On a scale of 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent do you consider that Action no. 1 - BETTER AIR QUALITY PLANNING (GOVERNANCE) is crucial to tackle the specific problem described?

- 1 – Weakest
- 2 – Weak
- 3 – Neutral
- 4 – Strong
- 5 – Strongest

1.a. Please briefly justify your score

1000 character(s) maximum

Which partners are necessary to promote the recommendation?

Milan - Action Leader

Europe (JRC) - Coordination of sharing register of air quality regional-local measures

Europe (EUROCITIES, HEAL) - Expert input/review of Code of Good Practices

Europe (URBACT) - Expert input/review, based on the experience of URBACT Action Planning and Implementation Networks

Europe/National (e.g. Polish National Fund for Environmental Protection and Water Management)
- Promotion of the use of Code of Good Practice of Cities Air Quality Plans and dissemination of best practices and facilitation of comparative analysis on their relative effectiveness between cities and different governance levels

National (Croatia) - Expert input/review of Code of Good Practices and Cooperation for air quality planning within FAIRMODE

Local (Utrecht) - Expert input/review of Code of Good Practices

Local (HSY/Helsinki) - Expert input/review of Code of Good Practices, incl. write a chapter about stakeholder and public consultation. Provide input on best practices to the register of air quality regional-local measures shared by JRC

Local (Milan, HSY/Helsinki) - Cooperation for air quality planning within FAIRMODE

2. According to your experience, which actors should be involved in the implementation of the recommendation?

1000 character(s) maximum

3. Would you be interested in actively supporting the implementation of the Action?

- Yes
- I do not know
- No

3.a. If yes, how would you be able to contribute to the implementation of the Action?

1000 character(s) maximum

Sharing information from the Platform to our members.

Additional question

4. Is there any other action not included under Better Regulation and Better Implementation that should be considered as priority?

- Yes
- I do not Know
- No

THEME 2: Better Funding

ACTION N°2 – BETTER TARGETED FUNDING FOR AIR QUALITY

What is the specific problem?

The Partnership observed that the dynamics of measure implementation are to a high degree influenced by the business plans of each individual competent authority, primarily their organisational capacities and the availability of necessary financial resources.

Various EU and national funds are available to prepare and implement national, regional and local air pollution policies[1]. However, the Partnership found that there is an overall lack of specific programmes dedicated to funding of projects aimed at air pollution reduction, as funding of air pollution projects usually has to compete with other societal challenges. In addition, knowledge of the right procedures and

conditions is required and stakeholders consider procedures to acquire funding for clean air projects from EU funds difficult. It also appears that in some Member States the legal support for local experiments could be improved.

Last but not least, the Partnership found that air quality policy is often treated as a stand-alone effort, where developments in economic activities, transport, agriculture and energy use are seen as given. Air quality policies becomes more effective when integrated to other policies, for examples decisions about implementation of common agricultural policy, the European transport network, or the EU-climate and energy policy. This increases the possibilities for synergies between policy areas or to include potential negative side effects for air pollution in an early stage of the policy development process. In this respect, the Partnership observed that cities are in demand for more possibilities to integrate existing EU/MS /regional funds for implementing air quality measures.

The elements above combined notably determine a need for an increase in the relevant funding options for urban projects/plans to carry out air quality management solutions. This issue is particularly sensitive for those urban areas where the costs of local abatement measures for limit values compliance are remarkable (stronger measures and wider range of action to be taken).

[1] E.g. within the European Structural and Investment Funds €1.57 billion is allocated in the period 2014-2020 to air quality measures. Air quality measures can also be funded from the sustainable transport programme of the Cohesion Fund and measures to abate ammonia (a precursor of particulate matter) can be funded from the European Agricultural Fund for Rural Development. Management authorities in each member state decide about specific operational allocation of the available funds. Moreover co-funding for innovative projects can be obtained from the Connecting Europe Facility (CEF) programme, LIFE-programme, the European Fund for Strategic Investments (the so-called Juncker Investment Plan), Horizon 2020 (e.g. the European Green Vehicles Initiative), and the Urban Innovative Actions in sustainable development programme (€371 million for 2015-2020).

Which action is needed?

The Partnership identified the following action to tackle the problem described above:

- Assessing funding needs for the sustainable design/implementation of Cities Air Quality Action Plans and develop an appropriate business model to fund air quality measures, considering also the possibilities offered by the integration of different funding instruments (e.g. blending facilities).
- Making recommendations for:
 - Improving the targeting of existing funding instruments on air quality, as well as for providing technical assistance for cities to access such funding instruments. As a positive example, the Croatian Environmental Protection and Energy Efficiency Fund (EPEEF) provides co-financing to cities for developing air quality plans and air quality projects, as well as for measures implementation. Likewise, in Poland, the National Fund for Environmental Protection and Water Management funds air quality projects, using resources coming, among other things, from penalties raised on pollutants.
 - Having funding bodies play a more active role in making funding opportunities easier to access for cities, as well as in facilitating the dissemination and the uptake of air quality–related project results in EU and national policy making.

How to implement the action?

1. Defining funding needs for the sustainable design/implementation of Cities Air Quality Action Plans, and assessing sources of funding, and options for their integration.
2. Developing a pilot business model based on the City Air Quality Action Plans designed on the basis of the Code of Good Practices developed under Action N°1 above.
3. Presenting results on pilot business model at event and disseminating them online (web, social media).
4. Drafting recommendations for improving the targeting of existing funding instruments on air quality, as well as their integration, based on the results of the pilot.
5. Drafting recommendations for having funding bodies play a more active role in making funding opportunities easier to access for cities, as well as in facilitating the dissemination and the uptake of air quality-related project results in EU and national policy making.
6. Sharing draft recommendations with stakeholders through internet-based public consultation and/or Partnership event and finalization of recommendations.

1. On a scale of 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent do you consider that Action no. 2 - BETTER TARGETED FUNDING FOR AIR QUALITY is crucial to tackle the specific problem described?

- 1 – Weakest
- 2 – Weak
- 3 – Neutral
- 4 – Strong
- 5 – Strongest

1.a. Please briefly justify your score

1000 character(s) maximum

We would also add another action, which is earmarking public EU money for innovative projects to reduce air pollution in new multiannual financial funds and research funding under discussion.

Which partners are necessary to promote the recommendation?

Milan - Action Leader

Europe (COM) - Expert input/review

Europe (URBACT) - Invite URBACT cities to comment on the proposed business model

National/Regional - Expert input/review

National (Croatia, Poland)- Expert input/review, especially with consideration on existing/future financing solutions

Local (HSY/Helsinki, and other cities) - Expert input/review

2. According to your experience, which actors - other than those indicated - should be involved in the implementation of the Action?

1000 character(s) maximum

Other EU level environment and prevention organisations that are working on EU funding

3. Would you be interested in actively supporting the implementation of the Action?

- Yes
- I do not know
- No

3.a. If yes, how would you be able to contribute to the implementation of the Action?

1000 character(s) maximum

Advocating for more public money to tackle air pollution at the EU level and, through members at the national level.

Additional question

4. Is there any other action not included under Better Funding that should be considered as priority?

- Yes
- I do not know
- No

4.a. If yes, please explain what the additional action/-s that should be considered is.

1000 character(s) maximum

See above my comment to the first question.

THEME 3: Better Knowledge

ACTION N°3 – BETTER FOCUS ON PROTECTION AND IMPROVEMENT OF CITIZENS' HEALTH

What is the specific problem?

The findings of the Partnership clearly highlight that air quality planning in cities would benefit from complementing the 'focus on exceedances of limit values', with an additional emphasis on citizens' health.

In particular, an important finding of the Partnership is that, although limit values (based on existing indicators) are not questioned, there is a need to go beyond them, as there are health impacts even at concentrations below current EU air quality standards. For instance, it was pointed out that in some hot spot areas, such as urban traffic stations, there are often exceedances of limit values (NO₂, PM₁₀, even in some locations PM_{2.5}). In these areas a number of people are exposed to the concentrations exceeding limit values, although the majority of urban population is not. Urban background concentrations are in most cities well below limit values. These concentrations better reflect large scale health impacts in these cities[1].

The Partnership also observed the need to better consider how air quality outcomes can be better integrated into existing funding mechanisms. To this end, it would be useful to include considerations regarding the impact on air quality as early as possible in the planning formulation process as a possible criterion for funding infrastructural or industrial development projects. This would be an ideal way to communicate with stakeholders, financiers and government layers and to contribute to make it harder to fund projects that would contribute negatively to air quality.

The development of an additional indicator/-s for measuring air quality health impacts could be a way to move in that direction[2]. Such a health assessment instrument would be no replacement of existing indicators, nor would it question the related limit values, but it would be a concrete way to go beyond them, as relevant for safeguarding citizens' health.

There is already a lot of technical knowledge about air quality, both regarding the effects and the causes of air pollution, as well as useful indicators[3]. However, the Partnership found that health impact assessments obtained by means of larger scale models are not able to capture the additional effect on health of traffic proximity exposure[4], which can only be assessed with detailed models, which are more expensive - both financially and in term of computational time, although generally useful for determining the effects of local measures.

The Partnership believes that the development of this additional indicator/-s for measuring air quality health impacts can be a valuable opportunity to foster synergies in urban planning between different policies (i.e. air quality, energy, mobility, housing, etc.) and health.

As a further step, instruments able to assess external costs of different health impacts could be developed with the help of experts (i.e. WHO). This health assessment instrument could be used to obtain the relative value in term of external cost and become a basis for cost-benefit analysis of measures to improve air quality.

Last but not least, the introduction of an additional indicator/-s for measuring air quality health impacts would also contribute to boost the effectiveness of communication to the general public. Instead of talking about the co-funding of technical operations, budgets lines spent, rules modified, the institutional messages would focus more on measurable benefits generated in terms of well-being, quality of life improved, and cleaner air, which are issues that probably resonate more for most of European citizens.

[1] This was presented in the JRC modelling reported in the Partnership's findings on Work Package (WP)1. Notably urban populations, more than people residing in other areas, suffer the effects on health of traffic-related pollutants, mainly 'primary pollutants' such as NO /NO2 and finest particles (Ultrafine Particles or Nanoparticles) characterized by the presence of toxic and carcinogenic compounds such as PAHs (Polycyclic Aromatic Hydrocarbons), Black Carbon, benzene and heavy metals.

[2] Indicator does not necessarily mean a single number. It may also refer to a set of numbers or an instrument/approach. Moreover, the term "indicator" can refer to many types of data.

[3] Several tools, or indicators, are available, such as GES in the Netherlands, the use of DALYs, and health impact assessments. See for example the WHO report on Air Pollution Health Risk Assessments (AP-HRA) http://www.euro.who.int/__data/assets/pdf_file/0006/298482/Health-risk-assessment-air-pollution-General-principles-en.pdf?ua=1 .

[4] See also APHEKOM Project results http://aphekom.org/c/document_library/get_file?uuid=4846eb19-df8a-486e-9393-1b7c7ac78ce3&groupId=10347 and also <http://decumanus-fp7.eu/home/>.

Which action is needed?

The Partnership identified the following action to tackle the problem described above:

In the current situation (spatial) planning is based upon approaches that do not fully reflect adverse health effects of pollution. Therefore additional instruments are needed to take these effects into account, and protect and improve citizen's health. This could be useful for:

Stimulating more focus on improvement of citizens' health and encouraging cities to give more emphasis to air quality-related impacts on health in the planning of their interventions. Requesting to indicate the impact of air quality on health and apply a new instrument for measuring benefits generated in terms of citizen's health and living environments.

How to implement the action?

1. Mapping and assessing existing (health) impact tools, or monetisation tools (e.g. Cost benefit analyses), specifically regarding their applicability for air pollution and/or for environmental stressors,[1] taking also into account context (explanatory) factors (e.g. institutional and cultural factors)
2. Conducting empirical case studies
3. Developing an instrument, including indicators and use the instrument in a pilot project or in a test run call (e.g. with funding from relevant EU programme/initiative)
4. Evaluating and disseminating results through event, web and social media.

[1] See for instance https://ec.europa.eu/transport/themes/sustainable/studies/sustainable_en.

1. On a scale of 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent do you consider that Action no. 3 - BETTER FOCUS ON PROTECTION AND IMPROVEMENT OF CITIZENS' HEALTH is crucial to tackle the specific problem described?

- 1 – Weakest
- 2 – Weak
- 3 – Neutral
- 4 – Strong
- 5 – Strongest

1.a. Please briefly justify your score

1000 character(s) maximum

As previously mentioned, we would need to align with WHO and the work they are doing on the review of the air quality guidelines.

Which partners are necessary to promote the recommendation?

Utrecht - Action Leader

Europe (COM) - Expert input/review

Europe (URBACT) - Support the dissemination of the additional indicator/-s for measuring air quality health impacts

National/Regional (Croatia) - Expert input/review

Local (HSY/Helsinki, and other Partners) - Conduct empirical case studies, Expert input and review

Local (Utrecht) - Development, pilot and monitoring/evaluation

International (WHO[1]) - Expert input and review

[1] See for instance https://ec.europa.eu/transport/themes/sustainable/studies/sustainable_en.

2. According to your experience, which actors - other than those indicated - should be involved in the implementation of the Action?

1000 character(s) maximum

Groups representing the most vulnerable groups affected by air pollution, also doctors associations working on the field should be involved as they can provide the scientific expertise.

3. Would you be interested in actively supporting the implementation of the Action?

- Yes
- I do not know
- No

3.a. If yes, how would you be able to contribute to the implementation of the Action?

1000 character(s) maximum

As mentioned earlier, we would provide patients testimonials

ACTION N°4 – AWARENESS RAISING AND KNOWLEDGE SHARING

What is the specific problem?

In spite of the work carried out by the EU institutions, by the Member States and by grass-root movements in Europe, the general public has still been slowly engaging in air quality policy initiatives and knowledge of the effects of poor air quality on health is not widely available. Likewise, the general public has in some instances a low appreciation and acceptance of the measures adopted to improve air quality (e.g. traffic bans). The general public is often not aware of the impact of personal choices on air pollution and on their own health.

The Partnership has found that differences in the level of awareness of the general public across cities about the negative impacts of pollution on health represent a barrier to the effectiveness of air quality policy measures. Such differences, however, could be alleviated by sharing examples of successful measures to trigger participation and to coproduce solutions. Increased public awareness about health impacts is therefore essential for improving social acceptance of and support for air quality management measures, and the Partnership agrees that providing cities with improved communication strategies and tools and with relevant examples of best practice could contribute to deliver that result.

Which action is needed?

The Partnership identified the following action to tackle the problem described above:

- Improving cities' communication strategies by focusing on the benefits brought by clean air for health and well-being, environment and economy, as well as potential of positive side-effects (e.g. less noise, less congestion, greener cities).
- Developing a Communication Toolbox for awareness-raising strategies on air quality issues and solutions, organisation of events etc., focusing on an integrated multi-stakeholder approach (European, national, regional, local).
- Bringing together educational and information models of awareness-raising campaigns for different stakeholder groups to emphasise shared responsibility for air quality, propose concrete actions, and provide support for bottom-up awareness-raising/knowledge sharing initiatives (e.g. by schools, local businesses, civil society organisations, etc.) Examples of possible activities:
 - Educational campaigns --> e.g. inform children; involve all stakeholders; concentrate on health authorities; sectoral campaigns, bottom-up initiatives. For instance, Croatia: CZ collaboration; Chimney sweepers campaign in Finland [Chimney sweepers are distributing a leaflet "burn right" for households about wood burning in woodstoves and pharmacies are distributing a leaflet about street dust (e.g. how to reduce your exposure)].

- Promote citizen science and better solutions to complement regulatory and mandatory approaches to measure and manage air quality (e.g. like in the <https://hackacity.eu/> project) or consultations around various measures.
- Promote examples of participatory design and implementation of air quality policies, e.g. like recent citizen panels in Gdansk or ideas developed as part of <http://www.claircity.eu/> project or Smogathons (<https://www.smogathon.com/about>) to emphasise that air quality management is not only an expert issue; citizens may be part of a problem, but can also hold valuable solutions.
- Scale up activities such as <https://www.cleanairday.org.uk/> to the European level.
- Inviting the European Commission, MS and cities to dedicate resources for the development and implementation of communication campaigns^[1].

How to implement the action?

1. Selection of examples of best practice in the area of educational and information models of awareness-raising campaigns for different stakeholder groups to emphasise shared responsibility for air quality, propose concrete actions, and provide support for bottom-up awareness-raising /knowledge sharing initiatives.
2. Development of Communication Toolbox for awareness-raising strategies on air quality issues.
3. Fine-tuning of Communication Toolbox through feedback from stakeholders at EU, national, regional and local level.
4. Publication of Communication Toolbox with illustrative examples of best practices (web, social media) and presentation at showcasing event/-s.

HEAL as a partner can assist in developing Air Quality communication strategies, including a toolbox for designing, delivering and evaluating awareness raising campaigns. The Air Quality Communication strategies and the Toolbox will be based on examples of best practices. Educational/information campaigns on "clean" driving styles, traffic control for lower emissions and information on tampering of particle filters on vehicles can be included here. The work under this action will take into account results from EURO CITIES' relevant working group/-s, EEA, noise abatement societies and their equivalents on air pollution. Likewise, synergies will be sought with ongoing relevant EU projects in order to capitalise on their results.

[1] In compliance with public procurement applicable regulations.

1. On a scale of 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent do you consider that Action no. 4 - AWARENESS RAISING AND KNOWLEDGE SHARING is crucial to tackle the specific problem described?

- 1 – Weakest
- 2 – Weak
- 3 – Neutral
- 4 – Strong
- 5 – Strongest

1.a. Please briefly justify your score

1000 character(s) maximum

We should not only disseminate the results, but also aim to go viral with campaigns to raise awareness on the impact of air pollution on human health.

Which partners are necessary to promote the recommendation?

HEAL - Action Leader

Europe (HEAL, EURO CITIES) - Development of a communication strategy and toolbox

Europe (URBACT) - Support the development of Communication Toolbox, based on existing good practice and URBACT experience with stakeholder engagement

National/Regional - Expert input/review communication strategy and toolbox

National (Croatia, Poland) - Expert input/review communication strategy and toolbox. Notably Croatia will share with the Partnership the experience achieved as a pilot country in FAIRMODE WP 5 – Management practices

Local (HSY/Helsinki, other Partners, and other cities) - Expert input/review, implementation

2. According to your experience, which actors - other than those indicated - should be involved in the implementation of the Action?

1000 character(s) maximum

Patients and doctors associations (at the EU and national levels)

3. Would you be interested in actively supporting the implementation of the Action?

- Yes
- I do not know
- No

3.a. If yes, how would you be able to contribute to the implementation of the Action?

1000 character(s) maximum

ACTION N°5 – OUTREACH

What is the specific problem?

The Partnership has an EU-wide representation from cities, Member States, NGOs and the European Commission. Through an international workshop and other communication channels, such as the FUTURIUM web platform, the Partnership has already gathered valuable inputs from stakeholders and started to spread its results.

However, more work is needed to further disseminate the outcomes of the Partnership's work and to complement them with the views of an even larger number of stakeholders across Europe.

Indeed, one of the objectives of the Partnership was also to try and involve other Member States and cities in the development and implementation of pilots where models and best practices could be tested. For instance, some stakeholders indicated that they are interested in test-running the Code of Good Practices for Air Quality Plans, as developed by the Partnership in Action 1 above.

Which action is needed?

The Partnership identified the following action to tackle the problem described above:

- Organising local/national/European Air Quality events to exchange experiences and be updated about scientific developments under EU-projects (e.g. FAIRMODE), UNEP, WHO, the UNECE Air Convention, etc.

How to implement the action?

In order to foster exchange with and engagement of other stakeholders, the Partnership will organise a series of events (i.e. workshops, round-tables, or webinars) in different Member States. These events will be either national-/regional-oriented or have an international character.

Through these events the Partnership will seek to collect:

- Inputs on the new Action Plan (Findings, Actions and Recommendations)
- Suggestions for additional Actions and/or Recommendations

- Involvement of other stakeholders in the Actions (such as Partners already involved in the Partnership on Urban Mobility, and networks like the Covenant of Mayors and CIVITAS).

Partners will additionally seek opportunities to participate in relevant international workshops organised by third parties to further improve the outreach of the Partnership's communication activities on its results. As an example: The Partnership organised mid 2017 an international workshop in London to obtain input for the current Action Plan. The Netherlands will organise an international conference in spring 2018 on Ports and Shipping and clean air.

1. On a scale of 1 to 5 (with 1 being the weakest and 5 the strongest), to what extent do you consider that Action no. 5 - OUTREACH is crucial to tackle the specific problem described?

- 1 – Weakest
- 2 – Weak
- 3 – Neutral
- 4 – Strong
- 5 – Strongest

1.a. Please briefly justify your score

1000 character(s) maximum

In addition to the organisation of scientific events, also conferences for the lay public could be organised. We could explain through messages in billboards and social and traditional media the role of the EU in protecting public health, which will also be beneficial in times of wide Euroscepticism.

Which partners are necessary to promote the recommendation?

The Netherlands (tbc) - Action Leader

Europe (HEAL) - Organisation of webinars

Europe (COM) - Participate in and promote selected events

Europe (URBACT) - Support the dissemination of stakeholder events and consider opening some of the URBACT events, especially on the national scale, to Partnership representatives

National (Poland) - Organize events/webinars with involvement of Polish advisors network and the signatories of Covenant of Mayors initiative, in coordination with the Polish Ministry of Development

National (Croatia) - Organize national workshop or Partnership meeting in cooperation with Croatian UDG representative (tbc)

Local (HSY/Helsinki) - Organize an event with relevant Finnish ministries

Partners - Organise events / Participate to events/webinars organised under this action, as relevant / Promote the Partnership's results in third-party events

2. According to your experience, which actors - other than those indicated - should be involved in the implementation of the Action?

1000 character(s) maximum

As above, other EU and national and local groups representing vulnerable groups or the scientific society should be involved

3. Would you be interested in actively supporting the implementation of the Action?

- Yes
- I do not know
- No

3.a. If yes, how would you be able to contribute to the implementation of the Action?

1000 character(s) maximum

Sharing info, providing testimonials, amplifying campaigns messages

Additional question

4. Is there any other action not included under Better Knowledge that should be considered as priority?

- Yes
- I do not know
- No

Contact

UA.communication@ecorys.com
