CALL FOR CLEAN AIR

July 15th ENVI vote on NEC Directive

14 July 2015

Dear MEP,

On 15 July 2015, you will vote on Julie Girling's report concerning the revised National Emission Ceilings (NEC) Directive. On behalf of a coalition of over sixty health, environmental and animal welfare organisations, we urge you to stand for ambitious EU action that will benefit people's health, environment and the economy.

Every year, over 400,000 Europeans die prematurely because of air pollution. Bad air quality causes severe illnesses such as cardiovascular and respiratory disease, aggravation of asthma and chronic obstructive pulmonary disease (COPD), harms to children's healthy development and is a risk factor for diabetes. The health-related economic costs of air pollution are enormous, amounting to between €330 billion and €940 billion for the EU in the year 2010 alone.[1] This is equivalent to between 3 and 9% of the EU's GDP. Air pollution also impacts Europe's nature and biodiversity, agricultural yields and natural vegetation. Crop yield losses due to air pollution are estimated at €3 billion per year in 2010.[2]

More ambition is necessary, possible and cost-effective. The Commission's proposal to revise the National Emission Ceilings (NEC) Directive is very welcome but is far from sufficient to solve Europe's air quality problems. The European Parliament's impact assessment shows that the new EU climate and energy policy agreed by the Council in October would lead to significant air quality improvements for costs that are lower than in the initial Commission proposal.[3]

We therefore call upon you to support:

1. BINDING & AMBITIOUS EMISSION REDUCTION COMMITMENTS FOR 2025

Given the scale of damages caused by air pollution in the EU, the binding 2030 targets are clearly too far away in the future. Legally binding 2025 emission reduction commitments (ERCs) as proposed in compromise amendments 4, 18 & 19 would save 42,865 additional lives of Europeans per year compared to the Commission proposal. See more comparisons here.

- **SUPPORT COMPROMISE AMENDMENTS 4, 18 & 19**

2. AMBITIOUS EMISSION REDUCTION COMMITMENTS FOR 2030

Over 260,000 premature deaths would still occur in 2030 even after implementation of the Commission's proposal. Bigger emission reductions would lead to fewer damages and further socio-economic benefits. The 2030 emission reduction commitments (ERCs) as proposed in compromise amendments 18 & 19 would save 19,824 lives of Europeans per year compared to the Commission proposal. See more comparisons here.

- **SUPPORT COMPROMISE AMENDMENTS 18 & 19**
- **REJECT COMPROMISE AMENDMENT 23, AMENDMENT 188**

3. AMMONIA EMISSION REDUCTION COMMITMENTS

Ammonia emissions impact Europe's biodiversity as well as health through the formation of particle matter (PM). During days of high air pollution levels, over 50% of PM concentrations can be due to ammonia emitted outside cities, mostly by farms and by manure application and handling practices.[4] Solutions to reduce ammonia emissions at farm level are well known and cost-effective. See here how ammonia emissions affect human health.

- **SUPPORT COMPROMISE AMENDMENTS 18 & 19**
- **REJECT COMPROMISE AMENDMENT 23**

4. METHANE EMISSION REDUCTION COMMITMENTS

In addition to being a powerful greenhouse gas, methane contributes to the formation of ground level ozone which has severe impact on human health and vegetation. Methane reductions under the NEC Directive would therefore be a necessary and complementary tool to EU climate policies. Agriculture is the largest source of human-related methane emissions (45%). Emissions come from cattle and sheep and other ruminants as part of their normal digestive process and from manure decomposition (particularly from industrial lagoons as opposed to field deposited). See here how methane emissions affect human health.

- **SUPPORT COMPROMISE AMENDMENT 4A**
- **REJECT COMPROMISE AMENDMENT 22**

5. MERCURY EMISSION REDUCTION COMMITMENTS

Given the transboundary nature of mercury emissions and their significant adverse impacts on human health, the inclusion of mercury emission reduction commitments in the NEC Directive as proposed by the ITRE Committee would be an effective way of protecting human health from dangerous exposure to mercury. This would be consistent with the recent adoption of the Minamata Convention which is a legally-binding treaty to cut mercury emissions. The main source of EU mercury emissions in the air is coal-burning.

- **SUPPORT COMPROMISE AMENDMENTS 4 & 21**

6. DELETION OF FLEXIBILITIES

While some degree of flexibility is necessary in a Directive which sets objectives over a very long time scale, it should be strictly limited in order to prevent making the Directive unenforceable and risking losing on health and environmental protection.

- **SUPPORT COMPROMISE AMENDMENT 1 & AMENDMENTS 209-211**
- **REJECT AMENDMENTS 196, 198, 212, 216, 217-219, 232, 222, 225-227, 279, 92, 90, ITRE 16-17, ITRE 19**

7. EFFECTIVE NATIONAL AIR POLLUTION CONTROL PROGRAMMES (NAPCPS)

Member States should design appropriate, effective and timely measures at national level to improve air quality throughout their territory.

- **SUPPORT COMPROMISE AMENDMENTS 7, 9, 10, 11, 14 & 15**
- **REJECT AMENDMENTS 269-274, ITRE 21-22, 276-278, 284, 286, 289, 293, 294, 413-418, AGRI 44, ITRE 41-42, 435-443, 446, 451-454, 458, 460, 479-480, 55-56 AGRI 1, 66, AGRI 3-5, AM 68, 78-82, AGRI 7-8, 102, AGRI 11, AM 103, 104, 109-111, 114, 471-478, 183, AGRI 23-24, 186-187**
- **SUPPORT AMENDMENTS 421-422, 424-425, 428-433, AGRI 46-48, 444, 448-449, 468-469, 482, 106-107, 470, 483-488, 65, 108, 112**

8. ACCESS TO JUSTICE AND PUBLIC PARTICIPATION & INFORMATION

The Directive should facilitate the access to environmental information on air pollution and the impact it has on health and the environment, the participation of the public in the formulation of national programmes to reduce emissions of air pollution and access to justice where laws regulating air pollution are broken.

- **SUPPORT COMPROMISE AMENDMENTS 3 & 15**

9. OTHER

- **Support compromise amendment 8 on the directive's objectives;**
- **Support compromise amendment 5, amendments 258, 29, 46, 100 for an effective enforcement of air quality laws;**
- **Support compromise amendment 24 requiring the commission to review the directive;**
- **Support compromise amendments 2 & 16 improving the commission's reporting and guidance requirements;**
- **Reject amendments 297-302 which weaken member states' reporting requirements;**
- **Reject amendments 363-366, ITRE 34 introducing longer transposition dates;**
- **Support amendment 155 to ensure that the current NEC directive continues to apply as a minimum (and reject ITRE 35);**
- **Support compromise amendment 7 & amendment 99 to protect vulnerable groups;**
- **Support compromise amendment 17 on monitoring of air pollution impacts.**

Thank you in advance for your support.

Yours sincerely,

Jeremy Wates
Secretary General, European Environmental Bureau (EEB)

ON BEHALF OF:
European Environmental Bureau (EEB)
Health and Environment Alliance (HEAL)
Client Earth
Transport and Environment (T&E)
Air Pollution & Climate Secretariat (AirClim)
BirdLife Europe
World Wild Fund for Nature Europe (WWF)
European Respiratory Society (ERS)
European Federation of Allergy and Airways Diseases Patients Associations (EFA)
The Cancer Prevention and Education Society
European Public Health Alliance (EPHA)
Soot Free for the Climate Campaign
European Environmental Citizens Organisation for Standardisation ECOS
European Academy of Allergy and Clinical Immunology (EAACI)
European Chronic Obstructive Pulmonary Disease Coalition (COPD)
Zero Mercury Working Group
E3G - Third Generation Environmentalism
European Cyclists' Federation (ECF)
Slow Food
Compassion in World Farming (CIWF)

Change Partnership

Allergienet, Belgium
Allergy UK, United Kingdom
Associação Nacional de Conservação da Natureza (QUERCUS), Portugal
Bundesverband Bürgerinitiativen Umweltschutz (BBU), Germany
Brusselse Raad voor het Leefmilieu (BRAL), Belgium
Center for Environment and Health, Czech Republic
Cittadini per l'aria, Italy
Clean Air Action Group, Hungary
Clean Air in London, UK
Danish Ecological Council, Denmark
Danish Society for Nature Conservation, Denmark
Deutsche Umwelthilfe (DUH), Germany
Ecologistas en Acción, Spain
Ecoloxistes n'Aición d'Asturies, Spain
EU Umwelt Büro, Austria
Fédération française des associations et amicales de malades insuffisants ou handicapés respiratoires (FFAAIR)
Finnish Association for Nature Conservation (FANC), Finland
Flemish association for respiratory health and tuberculosis control (VRGT), Belgium
France Nature Environnement (FNE), France
French Asthma and Allergies Association, France
Friends of the Earth (NSC), Hungary
Friends of the Earth England Wales and Northern Ireland
Friends of the Earth Germany (BUND), Germany
Gezinsbond, Belgium
Italian Federation of Asthma and Allergy, Italy
Leefmilieu, Netherlands
Legambiente, Italy
Milieu Defensie, the Netherlands
Natuur en Milieu, the Netherlands
Naturschutzbund Deutschland (NABU), Germany
Norwegian Asthma and Allergy Foundation (NAAF), Norway
ÖKOBÜRO, Austria
RESPIRE - Association Nationale pour la Prévention et l'Amélioration de la Qualité de l'Air, France
Védegylet - Protect the Future! Hungary
VCÖ – Mobilität mit Zukunft, Austria
WWF Italy
Action for breast cancer foundation, Malta

Agenda for Environment and Responsible Development, Tanzania
Association pour la Protection de l'Environnement et le Développement Durable de Bizerte (APEDDUB), Tunisia
Armenian Women for Health and Health Environment NGO (AWHHE), Armenia
Citizens' Institute for Environmental Studies, CIES), Korea
IndyACT, Lebanon
Mongolian NGO Environment & Health Center, Mongolia
National Ecological Centre, Ukraine
Pesticide Action Network, Mauritius
SEE Change Net, Bosnia and Herzegovina
TOXISPHERA Environmental Health Association, Brazil


EUROPEAN
ENVIRONMENTAL
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TRANSPORT &
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Health & Environment Alliance

AirClim
Air Pollution & Climate Secretariat

epha
european public health alliance

WWF

COMPASSION
in world farming
ciwf.org

ERS
EUROPEAN
RESPIRATORY
SOCIETY
every breath counts

EFA

Slow Food

friends of
the earth
see things differently

BirdLife
INTERNATIONAL
EUROPE AND CENTRAL ASIA

ECC
European COPD Coalition

EAACI
EUROPEAN ACADEMY OF ALLERGY
AND CLINICAL IMMUNOLOGY

zero Hg
mercury working group

ECF
EUROPEAN CYCLISTS' FEDERATION

NABU

CleanAir
IN LONDON

ECOS

LEGAMBIENTE

E3G

France Nature
Environnement

Change
Partnership

SOOTFREE FOR THE
CLIMATE

Danmarks
Naturfredningsforening
Vi ta'r naturens parti

Gezinsbond

Bund für
Umwelt und
Naturschutz
Deutschland
BUND
FRIDENDS OF THE EARTH GERMANY

THE DANISH
ECOLOGICAL
COUNCIL

ACTION FOR BREAST CANCER
FOUNDATION
www.actionforbreastcancer.com

ecologistas
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NATUUR
&MILIEU

cancer
prevention

milieudefensie
Friends of the Earth Netherlands

Quercus

ÖKOBÜRO
ALLIANZ DER UMWELTBEWEGUNG

EU
Umweltbüro

Leefmilieu

ecoloxistes
n'aición
Asturies

Deutsche Umwelthilfe

VCÖ
MOBILITÄT MIT ZUKUNFT

Magyar
Természetvédők
Szövetsége
Föld Barátai Magyarország

FFAAIR

FederASMA
e ALLERGIE ONLUS
Federazione Italiana Pazienti

CITTADINI
PER L'ARIA

CITIZENS
ACTION
BRUSSELS

Allergy UK
leading the fight against allergy

indyACT

ASTMA- OG
ALLERGIFORBUNDET
– gjør Norge friskere

Asthme & Allergies
ASSOCIATION

TOXISPHERA
ASSOCIAÇÃO DE SAÚDE AMBIENTAL

Allergienet

VÉDEGYLET


시민환경연구소
Citizens' Institute for Environmental Studies

Suomen luonnonsuojeluliitto

respire

VIGT
Vlaamse Vereniging
voor Respiratoire Gezondheidszorg
en Tuberculosebestrijding

AWHHE
Armenian Women
for Health and Healthy
Environment



Levegő Munkacsoport

[1] European Commission's Impact Assessment, page 43
[2] European Commission's Impact Assessment, pages 14 and 19
[3] Complementary Impact Assessment on interactions between EU air quality policy and climate and energy policy, November 2014. See EU and country by country comparisons by using the Air-o-Meter.
[4] See for instance French study showing that 51% of PM2.5 concentrations during the March 2014 pollution peak in Paris came from ammonium nitrates from agriculture (CNRS, 2014). Available here: http://www2.cnrs.fr/presse/communique/3481.htm