

EFA's response to the EU Action Plan "Towards a Zero Pollution Ambition for Air, Water and Soil – building a Healthier Planet for Healthier People" (Directorate General for Environment)

The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) is the voice of over 200 million people living with allergy, asthma, and chronic obstructive pulmonary disease (COPD) in Europe. We bring together 39 national associations from 24 countries and channel their knowledge and demands to the European institutions. We connect European stakeholders to ignite change and bridge the policy gaps on allergy and airways diseases so that patients live uncompromised lives, have the right and access to the best quality care and a safe environment.

EFA is full Member of the **Health and Environment Alliance (HEAL)**, and we fully support HEAL's contribution to this consultation calling for Zero harm from pollution, Zero money for pollution, and Zero delay in stopping pollution.

EFA welcomes the Roadmap on the Zero Pollution Ambition Action Plan for air, soil and water, and the many steps to be taken following the Green Deal communication of last December, which was premised on the findings of the fitness check of the EU Air Quality Directives.

For our patient community, this initiative goes well beyond environment, bearing far-reaching implications for the society, economy and human health. Breathing clean air is fundamental to people, and a prerequisite for the wellbeing and quality of life of people living with respiratory allergy, asthma or COPD and any other chronic respiratory diseases, as well as with cancer (see EFA's [response](#) to Europe's Beating Cancer Plan).

We therefore call on the European Commission to **embed health aspects within the very core of this initiative, namely including TFEU Article 168 on Public Health as the basis for this legislative intervention**, which is not mentioned in the Roadmap.

Think quality, not pollution, when regulating air

We, as people living with airways diseases, are directly impacted by air quality in Europe, our lives depend on it. We actively seek environments with good air quality, a result-oriented concept that is not yet fully integrated into EU action, which is rather pollution/pollutants oriented.

From our perspective, the current legislative framework governing air pollution is a patchwork of narrow sectoral legislations setting emission levels by sector. While the current setting has been proved effective for certain industries, it misses the holistic view that an entity thing like air requires, because it inevitably leaves out pollutants, sectors and places.

EFA therefore insists on the need to define **an EU air quality framework strategy to ensure consistency and synergies across policies and sectors contributing to air pollution**. We hope this Zero Pollution Action Plan becomes that framework, an all-encompassing plan that takes into account the synergies between the environment and climate change with health. Such a framework should:

- Align with the latest scientific advice on air quality to preserve good health (the current and future WHO air quality guidelines)
- Meet the international agreements the EU has committed to, especially the Paris Agreement
- Set stricter emission levels for the energy, industry, transport, agriculture and farming (see [EFA's response](#) to the Farm-to-Fork consultation), waste and buildings sector (see [EFA's response](#) to the Renovation Wave consultation)
- Include climate change considerations affecting air quality i.e. temperature, humidity, pollen (see [EFA's response](#) to the Climate Change adaptation strategy). Although pollen is a natural

pollutant, it is very much affected and exacerbated by climate change, air pollution and human industrial processes

- Set an ambition to tackle air pollution both indoors and outdoors

Improving outdoor air quality

Air pollution is a major environmental risk to health, causing 400,000 premature deaths in the EU per year. Breathing **polluted air can lead to the development and worsening of allergy, asthma and COPD**, while studies have associated **early-life exposure to pollution with reduced lung function**, including greater risk for the development of childhood asthma, the most prevalent chronic disease among children. During the COVID-19 pandemic, dirty air in urban areas has been shown to increase the overall death toll from the virus.

More than 50% of asthma and COPD patients feel that policy-makers are not doing enough to promote air quality information, while 38% think that public authorities do not protect them sufficiently from transport pollution¹. EFA therefore stresses the need to upgrade current air quality legislation, in the context of a Zero Air Pollution Action Plan to:

- expand and improve the current **monitoring network to other pollutants** (such as ultrafine particles, Volatile Organic Compounds, dust and pollens) which compromise our health and ability to breathe
- improve and expand the **air quality monitoring station network**
- improve the **information to the public with real-time specific, transparent and accessible messaging** taking the example of the Canadian Air Quality Health Index. Develop targeted information for vulnerable groups such as respiratory disease patients
- reinforce current **occupation health protection** within the Carcinogens and Mutagens Directive with further measures ensuring the protection of workers' health² linked with the onset of occupational respiratory conditions such as asthma both indoors and outdoors, as 83% of patients with COPD or asthma consider indoor air pollution from occupational activities to negatively affect their health, while 79% of patients believe that chemical products impact their condition³

Including indoor air quality

We spend about 90% of our time indoors, so the safety and quality of our internal environments also determines our health. People are exposed to indoor air pollution everywhere, in workplaces with volatile harmful chemicals; mouldy and damp buildings; households using solid fuels to cook and heat; closed spaces filled with tobacco smoke. Recently, home isolation during COVID-19 lockdowns has shown the importance of ventilation and indoor air quality, and evidence and guidance is arising on the importance of air exchange, clean and correctly calibrated and maintained ventilation systems so that the virus does not transmit in indoor spaces despite social distancing.

In this context, we call the European Commission to take steps to:

- Provide **certainty and information on the healthiness of buildings** via e.g. mandatory indoor air quality certificates (which could be integrated with the energy efficiency certificates) to serve as a source of information on indoor air quality for respiratory patients. Other interventions can include harmonised **standards to ensure better air conditioning and ventilation** systems in EU buildings; and improved measurement of the emissions of

¹ https://www.efanet.org/images/ShowLeadership/Report-ShowLeadership_FINAL.pdf

² According to the European Agency for Safety and Health at Work (EU-OSHA), 38% of European enterprises report potentially dangerous chemical or biological substances in their workplaces

³ https://www.efanet.org/images/ShowLeadership/Report-ShowLeadership_FINAL.pdf

construction materials such as Volatile Organic Compounds (VOCs) – something that could be integrated into the revision of the Construction Materials Regulation.

- Address **tobacco smoke**, which affects the air we breathe in closed spaces, with demonstrated harmful effects for respiratory health, cardiovascular disease and cancer. EFA calls on the EU to enforce the 100% smoke free environments, as stipulated in Article 8 of the WHO Framework Convention on Tobacco Control. Moreover, smoke-free places should be extended to sensitive public spaces such as parks, educational and health facilities entrances, and terraces.
- Ensure **safe, chemical-free indoor workplaces**, an area still elusive in the EU.