

To: Environment Ministers of EU Member States, EU Commissioner for Environment, Maritime Affairs and Fisheries, EU Commissioner for Health & Food Safety, Chair of the European Parliament Environment Committee and MEPs Julie Girling, Seb Dance, Jens Gieseke, Catherine Bearder, Kateřina Konečná, Bas Eickhout and Piernicola Pedicini

Call for clean air

Open letter by 76 public health, environmental, civil society, organic farming and animal welfare organisations on the opening of the trilogue negotiations on the National Emissions Ceilings Directive

Brussels, 22 February 2016

Dear Ministers,
Dear Commissioners,
Dear Members of the European Parliament,

This week you will be starting the trilogue negotiations for the new EU National Emissions Ceilings Directive (NEC). The NEC is a unique opportunity to set the EU on track for clean air and save literally thousands of European citizens' lives each year.

In the EU, air pollution continues to be an “invisible killer” causing 403,000 premature deaths in the year 2012 alone.

Poor air quality also contributes to severe chronic disease across the lifespan including cardio-vascular and respiratory disease such as asthma, allergies, chronic obstructive pulmonary disease (COPD), lung cancer, impaired prenatal and early childhood development, and other chronic conditions such as diabetes, liver disease, mental health, obesity and childhood leukaemia. The health-related economic costs of air pollution are estimated at between €330 - €940 billion for the EU annually, which is equivalent to 3 - 9% of the EU's GDP. Air pollution also impacts Europe's nature and biodiversity, agricultural yields and natural vegetation. Crop losses due to air pollution are estimated at €3 billion per year.

The European Commission has put forward proposals which would help tackle the severity and pervasiveness of air pollution as a public health emergency. We welcome this move and the improvements proposed by the European Parliament, in particular its call for earlier action. We are seriously concerned by the Council's intention of weakening the overall ambition level, which will cause approximately 16,000 additional early deaths in the EU each year.¹ We are also alarmed by the high number of derogations and flexibilities introduced by the Council which undermine the whole purpose of the Directive to reduce air pollution and prevent premature deaths.²

We, the undersigned public health, environmental, civil society organisations ask you to support the following five priorities for the trilogue negotiations:

1. **Support emission reduction commitments corresponding to at least 52% health improvement by 2030 EU-wide** as proposed by the European Commission and the European Parliament - notably no weakening of ammonia and PM_{2.5} emission reduction commitments.
2. **Support legally binding targets for 2025 as requested by the European Parliament.** Early action to tackle air pollution must be a priority.
3. **Reject unnecessary flexibilities, such as the adjustment of emission inventories,** adjustment of emission factors and three-year averaging calculations, which are not justifiable and will dilute the ambition level of the Directive.
4. **Keep methane emission reduction commitments** in the Directive as a way of tackling ground-level ozone. We also call upon the Commission to **address harmful mercury emissions when reviewing the Directive.**
5. **Support provisions granting the public the right to access to information, to participate** in the formulation of national air pollution control programmes and to **access the courts** if their governments fail to comply with the Directive.

Breathing clean air is one of our most fundamental human needs. Every EU citizen has the right to grow up, live and work in an environment which promotes their health rather than threatening it.

Achieving good air quality requires strong action and commitment at EU level. The time to take this action is now. Each delay will result in additional unnecessary deaths, increased health impacts and suffering, and continued strain on healthcare budgets.

Thank you in advance for your support.

Yours sincerely,



Jeremy Wates
Secretary General, European Environmental Bureau (EEB)

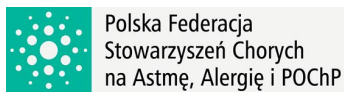
ON BEHALF OF:

European Environmental Bureau - EEB
Health and Environment Alliance - HEAL
Air Pollution & Climate Secretariat – AirClim
Client Earth
Transport and Environment - T&E
Greenpeace
Friends of the Earth Europe - FoEE
World Wild Fund for Nature Europe – WWF
BirdLife Europe
The European Public Health Alliance - EPHA
The European Respiratory Society - ERS
European Federation of Allergy and Airways Diseases Patients Associations - EFA
Compassion in World Farming - CIWF
European COPD Coalition – ECC
European Academy of Allergy and Clinical Immunology - EAACI
European Cyclists’ Federation - ECF
EU Federation of Organic Agriculture Movements - IFOAM – EU
Slow Food
Change Partnership
The Cancer Prevention and Education Society, UK
Clean Air in London, UK
Alliance for Cancer Prevention, UK
Health Equalities Group – HEG, UK
Royal College of Physicians, London, UK
Naturschutzbund Deutschland - NABU, Germany
Friends of the Earth Germany - BUND, Germany
Deutsche Umwelthilfe - DUH, Germany
Der Deutsche Naturschutzring - DNR, Germany
Long fonds, Netherlands
Milieu Defensie, the Netherlands
Natuur en Milieu, Netherlands
Leefmilieu, Netherlands
MOBilisation for the Environment, Netherlands
Vereniging Nederlands Cultuurlandschap, Netherlands
Asthma and Allergies Association, France
France Nature Environnement - FNE, France

Fédération SEPANSO Aquitaine, France
Ecologistas en Acción, Spain
Fundación Alborada, Spain
Martorell Viu, Spain
Instituto Internacional de Derecho y Medio Ambiente - IIDMA, Spain
Asociación Española de Educación Ambiental, Spain
Federation of Respiratory Diseases' Associations, Spain
Spanish Society of Epidemiology
Cittadini per l'Aria, Italy
Legambiente, Italy
WWF Italy
Medicina Democratica Onlus, Italy
Cyclopride Italia, Italy
Agenzia Nazionale per la Prevenzione, Italy
Associazione per la lotta alla trombosi e alle malattie cardiovascolari onlus, Italy
Associazione per la medicina centrata sulla persona onlus ente morale, Italy
Istituto di Ricerche Farmacologiche Mario Negri, Italy
Associazione Malattie da Intossicazione Cronica e Ambientale – AMICA, Italy
Associazione Culturale Pediatri, Italy
Associazione medici per l'ambiente - ISDE Italy
Ambientescienze, Italy
Coordinamento agende 21 locali italiane
FederASMA e ALLERGIE Onlus – Federazione Italiana Pazienti
Federation of Asthma, Allergy and COPD Patients' Organisations, Poland
Brusselse Raad voor het Leefmilieu - BRAL, Belgium
Green Circle - Zelený kruh, Czech Republic
Clean Air Action Group, Hungary
Heart and Lung Association, Sweden
Danish Ecological Council, Denmark
Finnish Association for Nature Conservation - FANC, Finland
ÖKOBÜRO, Austria
VCÖ – Mobilität mit Zukunft, Austria
ÄrztInnen für eine gesunde Umwelt – AeGU, Austria
European Institute of Women's Health - EIWH, Ireland
Asthma Society of Ireland
Environmental Pillar, Ireland
"Europe and We" Association, Bulgaria
Action for breast cancer foundation, Malta
Malta Health Network
Asthma and Allergy Foundation, Norway



cancer prevention



Asociación Española de Educación Ambiental

European Institute of Women's Health - Setting the Agenda in Women's Health

¹ In his speech at the Environment Council's debate on 16 December 2015, EU Environment Commissioner Vella estimated that every percentage change from the 52% health improvement target proposed by the Commission would result in around 4,000 additional premature deaths in the year 2030. The four percentage cut proposed by the Council is therefore estimated to cause around 16,000 additional premature deaths EU wide in the year 2030.

² NGO comments about the different flexibilities proposed by the European Commission and Council can be found here:
<http://www.eeb.org/index.cfm/library/flexibilities-in-the-national-emission-ceilings-nec-directive-undermining-effective-law-making/>