



**Subject:** Public Health recommendations for strong National Emission Ceiling (NEC) Directive

To: Ministers of Environment of the European Union Member States

CC: Ministers of Health of the European Union Member States

Dear Ministers,

We, the undersigned 17 health organisations, representing thousands of health professionals and affected European citizens, are writing to you ahead of the 16<sup>th</sup> December meeting where you will discuss the revision of the National Emission Ceilings (NEC) Directive to urge you to support saving the lives of tens of thousands of Europeans lost each year. We urge you to:

1. Keep **methane** and **mercury** among the pollutants covered by the targets, based on the strong scientific evidence of their contribution to air pollution and health impacts;
2. **Include legally binding targets** for all pollutants for Member States to be **met by 2025**, targets supported by the European Parliament, and give priority to early action to significantly decrease air pollution
3. **Support greater emission reduction commitments (ERCs)** going beyond the 52% reduction in health impact by 2030 as proposed by the European Commission. This is especially important for **ammonia** as cutting its emissions would reduce Particulate matter (PM) levels and exposure and therefore **improve people's health**;
4. **Reject unnecessary flexibilities** which could **in-fact dilute the ambitious content of the Directive**, such as the adjustment of emission inventories, adjustment of emission factors and three-year averaging in case of dry summers or cold winters.

According to the World Health Organization (WHO), exposure to air pollutants, including fine particulate matter, is a leading risk factor for non-communicable diseases in adults, including **ischemic heart disease, stroke, chronic obstructive pulmonary disease (COPD), asthma and cancer**. WHO evidence also underline that **children's healthy development** is particularly under threat from air pollution.<sup>1</sup> It poses a considerable health threat not only to current but also future generations.<sup>2</sup> New studies are emerging which indicate the role of ambient air pollution in the development of other chronic conditions such as **diabetes, liver disease, mental health, obesity<sup>3</sup> and childhood leukaemia<sup>4</sup>**. Air pollution has a **gender dimension too** because of physiological differences between women and men leading to differing pollutant health effects. PM associated Cardiovascular Disease (CVD) risks are statistically significantly higher among women with diabetes<sup>5</sup>.

The public health context in terms of protecting EU citizens' health and **reducing the chronic disease burden and its associated costs** to healthcare systems is a vital consideration in this debate. The European Environment Agency (EEA) estimated in its recent report that long-term exposure to PM<sub>2.5</sub> caused **403,000 premature deaths** in the EU-28 in 2012.<sup>6</sup> In addition, the health related economic costs are enormous, and amount to as much as **€940 billion for the year 2010 alone**.<sup>7</sup> The Directive you are discussing **will make an important contribution to reaching air quality as recommended by the WHO**. We urge you not to weaken it to protect interests or groups, but instead strengthen the Commission proposal.

For the contested points of the Directive on the agriculture sector, the NEC proposal could affect mainly **large industrial farms**, as the Directive offers flexibility to Member States to decide which farms they want to address and therefore small farms can be excluded. There are also transition mechanisms with funding support envisaged.

**Nothing is of more importance as a European issue than the air we breathe. As air pollution does not recognise borders**, the EU must - and has the power - to act to protect the health of its citizens, halt premature deaths and keep health systems sustainable. We hope we can count on your support and strong political leadership for **this vitally important public health issue**.

Yours Sincerely,

<sup>1</sup> WHO REVIHAPP project: [http://www.euro.who.int/\\_data/assets/pdf\\_file/0004/193108/REVIHAPP-Final-technical-report-final-version.pdf?ua=1](http://www.euro.who.int/_data/assets/pdf_file/0004/193108/REVIHAPP-Final-technical-report-final-version.pdf?ua=1)

<sup>2</sup> WHO regional office for Europe. Air quality and health resolution adopted at the sixty-eighth World Health Assembly. 2015. <http://www.euro.who.int/en/health-topics/environment-and-health/air-quality/news/news/2015/05/air-quality-and-health-resolution-adopted-at-the-sixty-eighth-world-health-assembly>

<sup>3</sup> Eze I C, Schaffner E, et al. Long-term air pollution exposure and diabetes in a population-based Swiss cohort. Environ Int 2014; 70: 95-105.

<sup>4</sup> Houot, Jennifer, Fabienne Marquant, Stéphanie Goujon, Laure Faure, Cécile Honoré, Marie-hélène Roth, Denis Hémon, and Jacqueline Clavel. 2015. "Residential Proximity to Heavy-Traffic Roads, Benzene Exposure, and Childhood Leukemia—The GEOCAP Study, 2002–2007." American Journal of Epidemiology 182 (8): 685–93. doi:10.1093/aje/kwv111.

<sup>5</sup> Jaime E. Hart, ScD1 et. Al. Effect Modification of Long-Term Air Pollution Exposures and the Risk of Incident Cardiovascular Disease in US Women Am Heart Assoc. 2015; 4: e002301 originally published November 25, 2015. <http://jaha.ahajournals.org/content/4/12/e002301.full?sid=0e76bb32-2e13-47bc-8fe7-e41d6414bec0>

<sup>6</sup> <http://www.eea.europa.eu/media/newsreleases/many-europeans-still-exposed-to-air-pollution-2015/premature-deaths-attributable-to-air-pollution>

<sup>7</sup> European Commission. Commission Staff Working Document: Impact Assessment on National Emissions Ceiling (NEC Directive) [http://ec.europa.eu/environment/archives/air/pdf/Impact\\_assessment\\_en.pdf](http://ec.europa.eu/environment/archives/air/pdf/Impact_assessment_en.pdf)

- Signatories, in alphabetic order:



The C2DS is an association of 500 public-private non profit and private hospital members in France founded in 2006. The aim of the C2DS is to raise awareness among key players in the healthcare sector and to promote the advantages of better practices in order to manage the environmental, human and economic impacts of healthcare activities.



The Council of Occupational Therapists for the European Countries is the European organization for all Occupational Therapists through their National Associations. [www.coteceurope.eu](http://www.coteceurope.eu)



The European Academy of Allergy and Clinical Immunology (EAACI) is the largest medical association in the field of allergy and clinical immunology, uniting more than 9,000 academicians, research investigators and clinicians from 121 different countries.



cause of millions of patients.

The European COPD Coalition (ECC) is a not for profit association committed to raising awareness among European policy makers and stakeholders about Chronic Obstructive Pulmonary Disease (COPD) and its social and economic impacts. The Coalition is calling for the development and the implementation of a comprehensive EU public health policy on COPD. The ECC urges swift political action to fight COPD, to uphold and support the



The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) is a non-profit network of allergy, asthma and chronic obstructive pulmonary diseases (COPD) patients' organisations, representing 40 national associations in 24 countries and over 400,000 patients. Visit <http://www.efanet.org> for more information.



EUROPEAN  
HEMATOLOGY  
ASSOCIATION

The European Hematology Association (EHA – ehaweb.org) is the leading European society for haematology—the medical specialty dealing with blood. We promote excellence in patient care, research and education in European haematology and represent the interests of the discipline, its clinicians and its scientists. We seek to influence policies to increase research funding

opportunities, to improve research regulations, to optimize access to medicines, and to harmonize and improve education and training.



fighting heart disease  
and stroke  
european heart network

The European Heart Network (EHN) is a Brussels-based alliance of heart foundations and likeminded non-governmental organisations throughout Europe, with member organisations in 24 countries. The EHN plays a leading role in the prevention and

reduction of cardiovascular diseases, in particular heart disease and stroke, through advocacy, networking, capacity-building and patient support, so that they are no longer a major cause of premature death and disability throughout Europe.

## European Institute of Women's Health

### *Setting the Agenda in Women's Health*



The European Institute of Women's Health's research reports and communication materials highlight that the

incidence and prevalence of some diseases are higher in women than men, while others affect men and women differently. Sex and gender are important variables in understanding health and health behaviour. For example, in response to the EU Commission's consultation on health inequalities (2009), the Institute recommended that more information and awareness on certain diseases pertinent to women was needed.



EPHA is a change agent – Europe's leading NGO advocating for better health. We are a dynamic member-led organisation, made up of public health NGOs, patient groups, health professionals, and disease groups working together to improve health and strengthen the voice of public health in Europe. EPHA is a member of, among others, the Social Platform, the Health and Environment Alliance (HEAL), the EU Civil Society Contact Group and the Better Regulation Watchdog. <http://www.epha.org/>



ERS

EUROPEAN  
RESPIRATORY  
SOCIETY

every breath counts

The European Respiratory Society (ERS; [www.ersnet.org](http://www.ersnet.org)) is an international organisation that brings together physicians, healthcare professionals, scientists and other experts working in respiratory medicine. They are one of the leading medical

organisations in the respiratory field, with a growing membership representing over 140 countries worldwide. Their mission is to promote lung health to alleviate suffering from disease and drive standards for respiratory medicine globally. Science, education and advocacy are at the core of everything they do.



France Nature Environnement is a French federation of environmental and nature protection associations. It represents over 3500 associations present on the entire French territories, metropolis and over-seas. It was created in 1968 and officially recognized as public interest in 1976. France Nature Environnement is fighting for environmental and nature protection with its federal team made of 43 employees and about 200 volunteers. It also brings together hundreds of thousands of militants, volunteers or employees within its membership network. France Nature Environnement works on a very broad panel of subjects linked to Environment: Agriculture, Water, Health, Economy, Transport, Oceans, Energy, Forest, Education... and is present in more than 200 authorities and governing bodies.



The Health and Environment Alliance (HEAL) is a leading European not-for-profit organisation addressing how the environment affects health in the European Union (EU). With the support of more than 70 member organisations, HEAL brings independent expertise and evidence from the health community to different decision-making processes.

HEALTH  
EQUALITIES  
GROUP



Health Equalities Group (HEG) is a UK-based social enterprise that seeks to tackle the root-causes of health inequalities by promoting population-level measures in tobacco control, alcohol, diet and nutrition and physical activity. Health Equalities Group achieves this through research, advocacy, consultancy and the delivery of practical projects and programmes in communities. [www.hegroup.org.uk](http://www.hegroup.org.uk)



Initiativ  
Liewensufank

Initiativ Liewensufank provides comprehensive information, advice and courses for expectant and new parents, carry out public awareness raising and administrative work and advocacy on behalf of the aims of the organisation. The aim of the Initiativ Liewensufank was, and still is, to improve circumstances around birth. We campaign amongst other things for: raising public awareness about environmental issues to protect the health of our families and the environment, and to ensure that life is still worth living for future generations. <http://www.liewensufank.lu/>



The Malta Health Network was set up in 2007 with the aim of representing in Malta, in the EU and internationally, the interests of patients and the health of the community, developing better coordination, collaboration and capacity building through exchange of best practice among Health Non Governmental (NGO) 'not for profit' (NPO) Organizations and Patient Representation Groups (PRGs). MHN is independent of the Government of Malta and of any political party or organization. The Network Currently started off with 20 funder member organisations and currently counts over 30 organisations. It supports initiatives to protect patients' health and is active in promoting The European Charter of Patients' rights. MHN participates in consultation sessions related to health and patient issues, has regular communication with local health Authorities and gives a voice to member organisations as need arises.



No Pain Foundation has been established in Malta at the end of 2014 to create an international non-profit organization for the purpose of carrying out social, educational as well as research and development activities in the field of pain management and pain therapies. All our activities are aimed at improving quality of life by raising doctor's and patients awareness and providing care to patients suffering from chronic pain, as we know that few patients are managed by pain specialists and many receive inadequate pain management. Our mission is to Improve the quality of life of people living with chronic pain promoting awareness about chronic pain.

This the reason behind the three macro purposes of No Pain Foundation: Education, Research and Care.



**Royal College  
of Physicians**

The Royal College of Physicians (RCP London) was founded in 1518 as a professional body of physicians whose individual membership now spans 80 countries including 24 Member States of the European Union. The College aims to improve the quality of patient care by continually raising medical standards through education and training for physicians

and works with government, the public, patients and other professions to improve health and healthcare.  
[www.rcplondon.ac.uk](http://www.rcplondon.ac.uk)