



NGO recommendations on the revision of the NEC directive following the publication of the rapporteur's draft report

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EUROPE'S AIR POLLUTION PROBLEM

Every year, over 400,000 Europeans die prematurely because of air pollution. Poor air quality also makes Europeans sick and significantly reduces their quality of life, in particular in cities. Increased illness, hospital admissions, extra medication and millions of lost working days are very costly for the European Union - the health-related costs of air pollution amounted to between €330 billion and €940 billion in 2010 alone, which is equivalent to between 3 and 9% of the EU's GDP.¹ This includes €15 billion in direct costs from lost workdays and €4 billion from treatment of chronic bronchitis. Air pollution also causes great harm to Europe's nature, crop yields, buildings and monuments.

Air quality improvements would bring enormous benefits to Europeans, in particular for health. Numerous studies have systematically demonstrated that the benefits of taking action outweigh the costs, in most cases by large margins. For instance, bringing concentration of fine particles to the World Health Organisation's (WHO) recommended levels in 25 European cities would add up to 22 months to the average life expectancy of their inhabitants, resulting in financial benefits of €31 billion per year.² There is a clear health, environmental and socio-economic case to reduce air pollution.

CURRENT LACK OF AMBITION OF PROPOSED REVISED NEC DIRECTIVE

The Commission's proposal to revise the National Emission Ceilings (NEC) Directive is very welcome but its ambition level does not match the scale of Europe's air quality problem and the benefits at stake. In particular:

- The 2020 targets, known as "Emission Reduction Commitments" (ERCs) have been copy-pasted from the 2012 revised Gothenburg Protocol without consideration of possible additional health and environmental benefits for Europeans. The proposed ERCs are expected to be achieved by Member States, in many cases by a wide margin, just by implementing existing legislation. In some cases, the proposed ERCs would actually allow higher emissions in 2020 than is allowed under the old NEC Directive as from 2010.³
- The Commission's proposal does not require any legally-binding reductions for 2025 and delays action until 2030.

- The proposed ERCs for 2030 which are estimated to reduce health impacts by 52% would still leave us far from achieving the World Health Organisation's recommended levels of air quality. Some 260,000 premature deaths would still occur in 2030, i.e. more than half of today's death toll. Large areas of sensitive ecosystems would still be exposed to excessive acidification and eutrophication.⁴

THE DRAFT ENVI COMMITTEE REPORT

Julie Girling MEP is the European Parliament's Rapporteur, and her draft report provides improvement with regard to some aspects of the Commission's proposal, in particular the 2025 emission reduction commitments which she proposes to make mandatory for four out of the six pollutants. The draft report also makes a number of other welcome improvements to the Commission's proposal, including:

- Requiring Member States to monitor the impacts of air pollution.
- Strengthening the role of both the Commission and the public in scrutinising national air pollution control programmes.
- Improving coherence between the NEC directive and the ambient air quality directive as well as with source emissions legislation.
- Removing the proposed shipping flexibility.

However, the Rapporteur missed the opportunity to improve the proposal's ambition level for 2020, 2025 and 2030.

MORE AMBITION IS WITHIN REACH

Adjustments of national emission inventories and projections by Member States published in a recent [report](#) show more optimistic developments in air pollutant emissions in comparison with the Commission's previous calculations.⁵ This means that more ambitious ERCs and higher benefits could be achieved for the same initial cost.

The European Parliamentary Research Service's [impact assessment](#) also demonstrates that more ambition is possible and can be achieved at the same or lower cost.⁶ It shows that reduced consumption of polluting fuels under the EU's new climate and energy policy agreed by the Council last October would decrease the need and costs for air pollution controls and make further air quality improvements less costly.

NGO RECOMMENDATIONS

In light of the significant health, environmental and economic benefits which could result from a more ambitious NEC Directive, we call upon the members of the Environment Committee to support:

- 1. Significantly stricter ERCs for 2025 and 2030. The ambition level should ensure the achievement of WHO recommended levels by 2030. The data provided by the European Parliament's impact assessment study provide a good basis for improvement.**

2. Stricter ERCs for 2020, based on the most recent baseline figures and establishing a linear pathway towards the achievement of the 2025 and 2030 ERCs.
3. Legally binding ERCs for 2025 for all pollutants covered by the Directive.
4. Legally binding ERCs for methane and mercury for all three targets years (2020, 2025 and 2030). Currently, methane reductions targets are set only for 2030, despite the fact that methane contributes to toxic ground-level ozone. [Mercury](#) is left out of the Commission's proposal despite being a toxic and highly trans-boundary pollutant causing great damage to health and ecosystems.
5. The rejection of flexibilities such as adjustment of emission inventories and offsetting of emissions between land and sea.

For more information, you can refer to our detailed [position paper](#) and/or contact us.

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¹ European Commission's Impact Assessment:

http://ec.europa.eu/environment/archives/air/pdf/Impact_assessment_en.pdf

² Aphekom project:

http://aphekom.org/c/document_library/get_file?uuid=5532fafa-921f-4ab1-9ed9-c0148f7da36a&groupId=10347

³ NOx emissions from Austria and Spain, NMVOC emissions from Germany, the Netherlands and Portugal, and NH3 emissions from Germany and Spain. Austria's NOx emissions for 2020 under the proposal are 40% higher than the 103,000 tons maximum permitted for 2010 under the existing NEC Directive.

⁴ Some 20,000 km² of acid-sensitive ecosystems and 750,000 km² of nitrogen-sensitive ecosystems would still be exposed to deposition of acidifying and eutrophying air pollutants that exceed the critical loads:

The Final Policy Scenarios of the EU Clean Air Policy Package, IIASA TSAP Report #11, February 2014, pages 14–18

http://www.iiasa.ac.at/web/home/research/researchPrograms/MitigationofAirPollutionandGreenhousegases/TSA_P_11-finalv1-1a.pdf

⁵ Adjusted historic emission data, projections, and optimized emission reduction targets for 2030, A comparison with COM data 2013, (IIASA), January 2015

http://www.iiasa.ac.at/web/home/research/researchPrograms/MitigationofAirPollutionandGreenhousegases/TSA_P_16a.pdf

⁶ Complementary Impact Assessment on interactions between EU air quality policy and climate and energy policy, (IIASA), Laxenburg, Austria, October 2014

[http://www.europarl.europa.eu/RegData/etudes/STUD/2014/528802/EPRS_STU\(2014\)528802_REV1_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2014/528802/EPRS_STU(2014)528802_REV1_EN.pdf)