UNICE

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# PROPOSAL FOR A DIRECTIVE RELATING TO OZONE IN AMBIENT AIR

## UNICE COMMENTS

The European Commission's proposal for a directive relating to ozone in ambient air has been widely identified as one of the most challenging aspects of the EU's air quality framework. During its first reading in the European Parliament, UNICE continued to advocate that the target value for ozone be reconsidered. We have also highlighted the rather weak scientific base upon which the proposed target is founded.

UNICE has continually advocated 160??g/m$^3$ as a challenging but realistic objective for ozone. This is the target value which the United States Environmental Protection Agency is seeking to move towards. The US EPA, under its legal obligation to protect human health, identified this as a target value for a national ambient air quality standard, fully protective of human health. It is important to note that it reached its conclusions from the same data set that the European Commission has used to develop its much more demanding proposal for a 120??g/m$^3$ target value.

With the present state of the art in technology, it must be recognised that 120 ?g/m$^3$ is for the time being, an unachievable goal - this is only partly recognised in the proposal via the mechanism of allowable exceedance rules and the fact that the European Commission identified that a binding target was unworkable.

It is also important to recognise the different scale of the problem in Southern Europe as compared with, say, Scandinavia. Local climate has so strong an influence that UNICE considers it is highly doubtful that the European Commission proposal for 20 exceedance days is sufficient to be realistic in Southern Europe.

The review process built into the proposal for a directive means that it not necessary to take excessively precautionary and over ambitious measures. Instead, the review process, or indeed the European Commission's forthcoming CAFE process, can be used to review targets in the light of a more robust understanding of the science, and the availability of properly tested computer models. Nevertheless, following first reading, it now appears that the debate in the European Council is discussing a figure of 120 ?g/m$^3$.

UNICE urges the European Council to review the proposal, with achievability foremost in mind. We hope that the European Council will be able to adapt the European Commission proposal to reflect the 160??g/m$^3$ target value which UNICE supports.

If this proves to be impossible, then we believe it will be necessary to increase the exceedence criteria in order to reach at least a feasible text for the common position, in which pragmatism modifies the current approach, to the benefit of all.

Union of Industrial and Employers' Confederations of Europe – Union des Confédérations de l'Industrie et des Employeurs d'Europe
Rue Joseph II 40/Bte 4 - B-1000 Brussels - VAT BE 536.059.612 - Tel. +32(0)2 237.65.11 - Fax +32(0)2 231.14.45 - E-mail: main@unice.be - Website: //www.unice.org