

PROPOSAL FOR A DIRECTIVE RELATING TO NATIONAL EMISSION CEILINGS

UNICE COMMENTS FOR SECOND READING

Summary

- ?? UNICE wishes to highlight that the projected additional air quality improvements associated which go beyond the emission ceiling targets agreed in the UN-ECE Gothenburg protocol are small and are outweighed by the costs involved.
- ?? UNICE therefore urges the European Parliament to recognise the extremely challenging nature of the emission ceilings proposed in the European Council political agreement.
- ?? UNICE believes that it is premature to define a binding timetable for going further than the emission ceilings proposed by the European Council, yet this is what a binding timetable for delivering the critical load targets in the proposal would imply.
- ?? Instead, UNICE supports a stepwise approach to the delivery of air quality targets and therefore proposes that the most constructive way forward is to use the 2004 review mechanism in the proposal to evaluate the progress which is actually being achieved, alongside the associated costs and benefits.

PROPOSAL FOR A DIRECTIVE RELATING TO NATIONAL EMISSION CEILINGS**UNICE COMMENTS FOR SECOND READING****Introduction**

It is important to recognise the close relationship between the proposal for a Directive on National Emission Ceilings for certain atmospheric pollutants and the revision of the Large Combustion Plant Directive: both tackle limitation of acidifying emissions of SO₂, and NO_x¹. Likewise, there is a close relationship with the ozone air quality proposal: both tackle the emissions of ozone precursors, VOC and NO_x.

The technical challenge presented by the targets in each of these proposals is severe and modifications to any one of the proposals will have inevitable consequences for the achievability of the other pieces of related legislation. A consistent approach to ensure that these initiatives collectively comprise a coherent package will be needed in the second reading in the European Parliament.

Considerable action has already been taken by European industry, to ensure reductions in these polluting and acidifying emissions. Significant further reductions are planned under a number of already agreed pieces of EU regulation.

UNICE Comments

In December 1999, Member States made commitments on emission ceilings in the context of UN-ECE negotiations, resulting in the signing of the "UN-ECE Gothenburg protocol".

In its June 2000 common position, the European Council proposes to move to different and even more ambitious targets than those in the UN-ECE Gothenburg protocol, though UNICE notes that the European Council position is not as extreme as the European Commission's original proposal dated June 1999.

UNICE has consistently expressed strong concerns about the level of ambition which is being targeted by the European Commission. European industry is convinced that the emission ceilings agreed by Member States in the UN-ECE Gothenburg protocol already represent an extremely challenging set of targets, which will deliver environmental improvements extremely close to those predicted by the European Commission's original proposal.

For the present, European industry believes the targets agreed in the UN-ECE Gothenburg protocol represent a sufficient but realistic level of ambition, which can be assessed in the review mechanism contained within the proposal. Consequently, UNICE regards setting targets more demanding than the ceilings in the Gothenburg protocol as premature.

The Commission's models predict very small incremental changes indeed to air quality. Because of this UNICE strongly believes that the process needs to include a robust

¹ SO₂: Sulphur Dioxide, NO_x: Nitrogen Oxides, VOC Volatile Organic Compounds;

validation of what is being achieved, compared with what is predicted. This means there is a need to compare the modelling results with the “real life” measured air quality data Member States are currently collecting. The proposal contains a 2004 review and UNICE believes that this offers an ideal mechanism to allow this necessary analysis to be built into the process, alongside the evaluation of costs and benefits, in a constructive way.

UNICE hopes that these important concerns will be taken into account during the second reading of these proposals in the European Parliament.
