



## Joint Industry statement on the EU Air Policy Review

**December 2013:** Industry is deeply concerned by aspects of the upcoming EC proposals in the Air Policy Review, in particular the proposed level of ambition for emission reduction targets (so-called “75% gap closure” scenario) and target year (2025).

### **Level of ambition: 50% rather than 75% “gap closure” for emission reductions**

There are three key elements which inform the setting of the emission reduction commitments: the emission reductions that will be delivered by current legislation, the costs of going beyond current legislation, and the environmental benefits of further measures. We have misgivings about the robustness of all three: uncertainties in underlying energy projections; uncertainties and errors in the way emission projections are calculated based on a view of current EU/National legislation; and uncertainties about the benefits methodology used to derive ambition levels.

As a result, the proposed high environmental ambition levels are at significant risk of being unattainable which would consequently lead to additional requirements going beyond what is technically feasible and have detrimental effects for EU industry’s competitiveness and EU jobs.

We therefore believe it is reasonable to call for the application of a 50% gap closure level of ambition.

### **Target year: 2030 rather than 2025**

We consider that setting further very ambitious emission reduction targets by 2025 is too soon, and that alignment of the future EU Air Policy with the Framework for Climate and Energy Policies dates is advisable. The National Emission Ceilings Directive (NECD) should therefore set emission reduction targets for 2030 instead of 2025.

### **Medium Combustion Plants Directive (MCP): consistency with existing EU legislative framework**

The upcoming MCP rules should not apply to units already regulated by an IED permit to avoid duplication of legislation.

### **The way forward:**

We urge EU Policymakers to set realistic ambition levels for the future Air Policy framework to ensure they remain consistent: with the goals of promoting a competitive European industry; balancing environmental protection with competitiveness; in line with the future 2030 Climate and Energy Framework; and with the objectives set by the Communication on Industrial policy.