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## **THEMATIC STRATEGY ON AIR POLLUTION**

Industry was actively engaged throughout the Clean Air for Europe (CAFE) Programme and supports the general approach of seeking cost-effective solutions to address predicted future air pollution across the fullest range of contributing sources. We appreciated DG Environment's openness to stakeholders during most of the CAFE process.

The Thematic Strategy on Air Pollution (TSAP) builds upon important previous air quality initiatives including the Convention on Long-range Transport of Air Pollution (CLRTAP), the Auto-Oil Programmes and the National Emission Ceilings Directive. It sets out the Commission's plans to further improve air pollution beyond already agreed measures and towards the long-term goals set out within the 6<sup>th</sup> Environmental Action Programme. In particular it sets environmental and health objectives to be achieved by 2020. Although the published TSAP is final, industry feels it is important that the Council and Parliament provide clear indications on how they wish to see the TSAP progressed.

In this regard, UNICE wishes to highlight the following key points:

### **European industry is playing its part in the Commission's efforts to improve air quality but is concerned about the consequences of other sectors not delivering their share of emission reductions:**

- industry is already highly regulated under current legislation, some of which is still to be fully implemented and show its full impact, e.g. the Integrated Pollution Prevention and Control Directive and Directives controlling emissions from new road vehicles;
- although additional industrial and road transport measures are expected, it is important to recognize that the new elements within the proposed AAQD rely very significantly on action by other sources of air pollution including domestic heating (coal and wood burning) and agriculture; and
- industry fears that if unreasonable expectations are set for these other sectors or if they are not implemented in practice, industry will be expected to compensate at escalating cost and further competitive disadvantage, even closure.

### **We are very concerned that health and environmental objectives within the TSAP will not be achievable in practice:**

- there are major uncertainties in all the following areas used in the derivation of the TSAP objectives: emissions; measurements; the models; detrimental health effects; costs; and monetized benefits – especially in the cases of PM<sub>2.5</sub> and ozone.
- the TSAP ambition level is still in the steeply rising area of the cost curves where benefit gains are marginal compared with costs and uncertainties pose a significant threat to feasibility; and

- current changes in assumptions, scientific understanding and anticipated under delivery of key control measures in the agricultural and domestic wood burning sectors may render these objectives significantly more costly or unachievable in practice.

Member States are also expressing concerns about achievability, increasing limits on spatial planning and the social acceptance of further measures.

**There are significant problems in meeting existing air quality regulations:**

- several Member States are predicted to have problems in complying with the existing 2010 National Emissions Ceilings and existing air quality regulations; and
- there is no indication that the Commission intends to revisit the 2010 national emissions ceilings under the current National Emissions Ceilings Directive (NECD) review.

**Care should be taken in committing Member States to further requirements without being confident that these can be delivered:**

- the TSAP sets out the Commission's intention to introduce more stringent national emission ceilings (most probably in 2020) under the National Emissions Ceilings Directive review and other new controls on ambient air quality and emissions.
- the TSAP relies heavily on significant reductions in emissions from agricultural and domestic heating that may not be achieved in practice; and
- we are concerned that the national breakdown of TSAP costs, social and economic impacts and benefits have not been fully identified or discussed.

In the context of the TSAP, **a balance should be struck between the desire to meet the defined health/environmental objectives, and other social and economic needs within the EU and at national level.**

- we understand that the TSAP health/environmental objectives will be used, without amendment, as the starting point for developing new national emission ceilings even though updated information, such as on energy projections, is likely to confirm an escalation in the overall cost of achieving those objectives.
- national economic and social impacts were not made available to industry ahead of the Commission decision and are not contained within the published impact assessment.

**Greater emphasis should be placed on fundamental research to improve understanding of the statistical linkages between fine particles and premature mortality, ozone and mortality, and to improve the monetization of benefits.**

- the Commission's Scientific Committee on Health and Environmental Risks (SCHER) stated that for fine particulate matter "There is currently a lack of knowledge on the exposure-response function for adverse health effects in Europe". In addition, Scientists have not been able to confirm causal factors or mechanisms which can explain the statistical association between fine particles and premature mortality.
- industry has severe doubts about the validity of monetized health benefit figures and recommends the use of non-monetised indicators as more reliable.

**Recommendations:**

1. Key issues and corrections still need to be addressed when developing follow up legislation. These include correction of the costs and effects of vehicle measures.
2. Efforts should concentrate on first ensuring the effective implementation of existing legislative commitments – these are expected to deliver much greater benefits than the proposed new measures under TSAP.
3. Follow-up legislative proposals should set realistic objectives which balance the environmental, social and economic needs, supported by their own full impact assessment.
4. Wider geographical action should be encouraged under the Convention on Long Range Transport of Air Pollution (CLRTAP) as a more cost effective means to achieve health and environmental protection within the EU.
5. Establish new European research to identify the relationship between air quality and human health that is relevant to future air quality in the EU and to identify the causal factors.
6. Improvements to the impacts assessment including an improved breakdown of cost and employment impacts on individual sectors in each Member State.

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