



Brussels, 16 March 2006

EU THEMATIC STRATEGY ON AIR QUALITY AND AMBIENT AIR QUALITY LEGISLATION

Dear Ms. Corbey and Mr. Krahmer,

As you write your reports and negotiate for the ENVI Committee over the coming weeks on one of the most important pieces of Community environmental policy impacting on people's health across Europe, the European Public Health Alliance, the European Federation of Allergy and Airways Disease Patients Association and EPHA Environment Network, **representatives of the health, environmental health and patient community throughout Europe**, ask you to ensure the highest possible level of health protection for EU citizen's by:

1. Ensuring a substantial increase in level of ambition

Remembering every hour, at least one person dies of respiratory disease in Western Europe¹.

Under the legislative obligation in the 6th Environmental Action Programme, the European Commission was required to come forward with a Thematic Strategy on Air Pollution that considers strict air quality standards to reduce the health burden on our society, especially the impact on vulnerable groups such as infants, children, the elderly and those suffering from asthma, allergies and other respiratory diseases. So far they have seemingly failed to achieve this goal.

According to the European Commission's own Impact Assessment², every year 369,980 people die prematurely because of air pollution. To put this in perspective this represents losing nearly the population of Malta every year. The costs of premature death, health care and medication due to air pollution amount to between 3% to 10% of the EU GDP³ but this figure does not include the pain and suffering of individuals and their families. Even though the Commission's impact assessment fails to quantify a significant number of impacts the benefits; even in the most ambitious Commission scenario benefits still outweigh the costs by up to 4.5 times.

¹ European Federation of Allergy and Airway Diseases Patients Association, A European patient perspective on severe asthma, Fighting for breath GINA Global Initiative for Asthma. The Global Burden of Asthma Report, 2004

² Baseline Scenarios for the Clean Air for Europe (CAFE) Programme Final Report Authors: Markus Amann, Imrich Bertok, Janusz Cofala, Frantisek Gyarfas, Chris Heyes, Zbigniew Klimont, Wolfgang Schöpp, Wilfried Winiwarter submitted to the European Commission Directorate General for Environment, Directorate C Environment and Health for the study on Development of the Baseline and Policy Scenarios and Integrated Assessment Modelling Framework for the Clean Air for Europe (CAFE) Programme LOT 1 Contract No B43040/ 2002/340248/MAR/C1

³ The total cost of asthma in Europe is €17.7bn per year, and productivity lost to poor asthma control is estimated at €9.8bnper annum European Respiratory Society. The European White Lung Book: The First Comprehensive Survey in Respiratory Health in Europe 2003

2. Implementation of all WHO health protection air quality guidelines and therefore NO re-negotiation of existing limit values.

The World Health Organisation (WHO) has recently published new air quality guidelines for the protection of health⁴ for which the particulate matter (PM) guidelines are:

PM_{2.5}: 10 µg/m³ annual mean, 25 µg/m³ 24-hour mean PM₁₀: 20 µg/m³ annual mean, 50 µg/m³ 24-hour mean

The PM₁₀ 24-hour mean is at present the only legislative measure that ensures those suffering from respiratory disease are adequately protected from peaks in pollution that cause hospitalization or even death. We therefore insist that **Parliamentarians do not weaken the PM₁₀ health standard, by turning it into a non legally binding limit value or by allowing subtraction of ‘natural’ PM₁₀ factors or allowing other forms of derogations or flexibility.** In this regard we remind Parliamentarians that they have already voted to ‘*insist that the Commission ensure proper implementation of existing European air quality legislation by Member States; asks the Commission to start infringement proceedings against those Member States which fail to ensure a high level of air quality for their citizens;*’⁵

Enough cause-effect evidence has now been presented for the WHO to propose a PM_{2.5} guideline that will protect health to an acceptable level which **Parliamentarians now have a responsibility to ensure becomes a legally binding limit value to be implemented within a reasonable time frame.** The WHO air quality guidelines state: *Although adverse effects on health cannot be entirely ruled out even below that level, [10µg/m³] the annual average WHO AQG represent levels that have been shown to be achievable in large urban areas in highly developed countries, and attainment is expected to effectively reduce the health risks.*

3. Ensuring the protection of vulnerable groups

Particularly for children, outdoor air pollution is associated with acute lower respiratory tract infections, asthma, allergies, low birth weight, and impaired lung function. Evidence is now overwhelming that PM₁₀ and PM_{2.5} are, for a large part, responsible for these adverse health impacts and deaths. The European Parliament has already acknowledged there has been a substantial and worrying increase over the last 20 years in the incidence of acute respiratory infections, which are the main cause of death in children under five and proven to be linked to outdoor and indoor air pollution. The Parliament considered ‘*that protecting the health of children against environment-related diseases is an essential investment with a view to ensuring adequate human and economic development.*’⁶

We believe that our children have a right to breathe clean air, and the European Commission, in this regard, has failed to take into consideration both ‘*Sound Science*’ or even the benefits highlighted in their own ‘*Impact Assessment*’ to fulfill this mandate. Even more alarming the proposed Thematic Strategy on Air Quality does not take into consideration WHO⁷

⁴ WHO air quality guidelines global update 2005 Report on a Working Group meeting, Bonn, Germany, 18-20 October 2005 <http://www.euro.who.int/Document/E87950.pdf>

⁵ European Parliament report on the European Environment & Health Action Plan 2004-2010. (2004/2132 (INI))

⁶ European Parliament resolution on a European Environment and Health Strategy (COM(2003) 338 – C5-0551/2003 – 2003/2222(INI))

⁷ World Health Organisation, Effects of air pollution on children’s health and development, A review of evidence, Special Programme on Health and Environment European Centre for Environment and Health

recommendations on vulnerable populations, as required under the Clean Air for Europe programme.

The reduction of the adverse health effects of air pollution is an important objective where the European Union can show that it really makes a difference to people's everyday lives.

We would be very happy to provide you with more details on how we believe these issues could be incorporated in your report.

Yours Sincerely,

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CC: Shadow Rapporteurs and secretariat

European Public Health Alliance (EPA)

The European Public Health Alliance (EPA) represents over 100 nongovernmental and other notforprofit organisations working on public health in Europe. EPA's mission is to promote and protect the health of all people living in Europe and advocate greater participation of citizens in healthrelated policy making at the European level.

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European Federation of Allergy and Airways Diseases Patients' Associations (EFA)

EFA is a collaborative Network of allergy, asthma and COPD patient associations in Europe with the mission to improve the Quality of Life of people with Allergy, Asthma and COPD and of their carers throughout Europe. EFA Vision is a European Community that shares the responsibilities for substantially reducing the frequency and severity of Allergies, Asthma and COPD and recognises their social environmental, economic and health implications.

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European Public Health Alliance – Environment Network (EEN)

EEN advocates protection of the environment as a means to improving the health and well being for European citizens. Launched in 2004, it brings together groups that want to ensure that health is at the centre of environment issues. Member groups include NGOs specialising in public health, environment related health conditions and women's environmental and health concerns and associations representing health care and environmental professionals. One of EEN's key objectives is to bring health expertise to the environment policymaking process.

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