

European Commission
Rue de la Loi 200
1049 Brussels

Brussels, 12 January 2011

To: President Barroso and the EU Commissioners

Re: Your upcoming College discussion on further measures to reduce air pollution in the EU

Dear President Barroso,

Dear Commissioner,

In view of the upcoming meeting of the College of Commissioners later this month we would like to call on you to support the immediate revision of the National Emission Ceilings (NEC) Directive.

An immediate revision should not be seen as a burden on Europe's economy – it is an opportunity to put the EU's economy on a recovery path that will improve the health of its citizens and their environment as quickly and as cheaply as possible.

1. The effects of air pollution on health and environment

Air pollution creates serious health problems for European citizens and exacts an enormous human and financial toll. Every year, air pollution by fine particles is estimated to cause 455,000 premature deaths in the 27 EU member states, corresponding to almost 4.5 million years of life lost. Ground-level ozone is responsible for some 20,000 premature deaths each year. Europe's ecosystems are heavily impacted by air pollution through acidification and eutrophication. Overload of nutrients is still a major factor pushing ecosystems towards tipping points and a major obstacle to achieving the newly adopted EU biodiversity targets for 2020.

2. Huge economic losses for society

The cost-benefit analyses prepared by the Directorate General for Environment show that strict air policies also make very good economic sense. They value the benefits for the economy of a revised NEC Directive at between €22 and €70 billion per year, which means that the benefits of action exceed the costs by up to 50 times¹, as the costs for achieving the environmental objectives of the Thematic Strategy on Air Pollution are estimated at €1.4-1.5

¹ See DG Environment's website, e.g. 2008 AEA "NEC CBA report #3" available at <http://ec.europa.eu/environment/air/pollutants/cba.htm>

billion in 2020. Additionally we would like to stress that short term concerns of specific sectors of the economy that are expected to bear a large share of the costs can not be a reason not to set new and stricter targets for 2020. The European economy can be expected to pick up well before 2020 and industry will need to take decisions on where and how they invest. By setting stricter ceilings for 2020 the Commission will give a crystal clear signal where these investments should be made and set the EU economy on a green recovery path, and contribute to the EU 2020 objectives of sustainable growth and creating over 1 million green jobs.

3. The achievability of new ceilings for 2020

The current ceilings for 2010 have proven to be an effective tool, and their overall implementation at national level can be seen as relatively encouraging. Indeed, according to the EEA's latest findings and recent declarations by national governments, 91 out of the 108 ceilings were expected to be met in 2010². What's more, this reduction in emissions occurred in a period of sustained economic growth. Several of the 17 expected breaches are minor (few percentage points). With the majority of current ceilings being achieved, there is no excuse to wait any longer before revising the Directive and postpone action against the unacceptable human suffering due to remaining air pollution.

4. Provide ceilings for finest particles without further delay

Fine particles (PM_{2.5}) have the highest estimated impact on human health yet no ceilings for these pollutants exist. Revising the NEC Directive now would ensure that overall emissions of finest particles are addressed without further delay.

5. Help member states comply with ambient air quality limit values

Most member states are struggling to meet binding limit values for PM₁₀ and NO₂ provided in EU ambient air quality legislation, and the Commission is currently launching infringement actions against 20 of them. Reducing overall emissions of air pollution will help address the effects of transboundary air pollution and therefore help competent authorities to comply with the requirements of the Air Quality Directive. It would also strengthen the European Commission's position when reviewing the Air Quality Directive, in particular when looking into stricter standards for PM_{2.5}, in accordance with the WHO recommendations.

6. Help mitigate climate change

Revised ceilings should also be seen as a way to mitigate climate change more efficiently and cheaply since climate change and air pollution share the same sources. Reductions in emissions of non-CO₂ greenhouse gases can contribute to the achievement of climate objectives. This is the case for pollutants such as methane, nitrogen oxides and VOCs that are responsible for ground-level ozone and also black carbon, a constituent of PM₁₀ which has significant warming impacts, particularly in the Arctic region. Reducing levels of these

² See latest EEA report of 24 September 2010 on the implementation of the NEC Directive : http://www.eea.europa.eu/highlights/air-pollutant-emissions-to-exceed?utm_campaign=air-pollutant-emissions-to-exceed&utm_medium=email&utm_source=EEASubscriptions

pollutants would benefit climate and air quality targets simultaneously with significant health and environment benefits.

7. Aim higher for 2013

We fully support Commissioner Potočník's initiative to create a "year of air" and raise the political profile of air related policy measures in 2013. However, we do not accept this as an argument to yet again postpone urgent action which has been on hold since 2007. We believe the EU should raise its level of ambition in 2013, as compared to the commitments made in the now five year old Thematic Strategy on Air Pollution.

Civil society from across Europe has called on the Commission repeatedly to cut air pollution as quickly as possible through an immediate revision of the NEC Directive. It is clear action must be taken sooner rather than later. Any further delay would be unacceptable given the costs to human health and the environment.

Yours sincerely,



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