



To: Members of the ENVI Committee

Subject: Health NGOs recommendations on the revision of the NEC directive following the publication of the rapporteur's draft report

Brussels, 13th of April 2015

Dear Members of the ENVI Committee,

This afternoon you will consider Mrs Girling MEP's draft report "Reduction of national emission of certain atmospheric pollutants and its amending directive". As healthcare professionals, patients, scientists, and public health advocates concerned with health and environmental protection, we write to you on behalf of the 400,000 Europeans whose premature deaths are caused each year by air pollution in Europe, and all those suffering from ill-health linked to air pollution to call on you to put public health considerations first in the political debate.

There is a large body of evidence on health effects of air pollution, including cardio-vascular and respiratory disease such as asthma, allergies, chronic obstructive pulmonary disease (COPD), but also increasingly effects on prenatal and early childhood development, and even diabetes. Increased illness, hospital admissions, extra medication and millions of lost working days are very costly for the European Union – the health-related costs of air pollution amounted to between €330 billion and €940 billion in 2010 alone, which is equivalent to between 3 and 9% of the EU's GDP¹. This includes €15 billion in direct costs from lost workdays and €4 billion from treatment of chronic bronchitis.

Air quality improvements would bring enormous advantages to Europeans, in particular for health. Numerous studies have systematically demonstrated that the benefits of taking action outweigh the costs, in most cases by large margins. For instance, bringing concentration of fine particles to the World Health Organisation's (WHO) recommended levels in 25 European cities would add up to 22 months to the average life expectancy of their inhabitants, resulting in financial gains of €31 billion per year². There is a clear health, environmental and socio-economic case to reduce air pollution.

Mrs Girling MEP's draft report provides improvement with regard to some aspects of the Commission's proposal, in particular the 2025 emission reduction commitments that she proposes to make mandatory for four out of the six pollutants. The draft report also makes a number of other significant improvements to the Commission's proposal, including: requiring Member States to monitor the impacts of air pollution, strengthening the role of both the Commission and the public in scrutinising national air pollution control programmes, improving coherence between the directive and the ambient air quality directive and source emissions legislations, removing the proposed shipping flexibility. Regrettably, the opportunity to improve the proposal's ambition level for 2020, 2025 and 2030 is missed.

¹ European Commission's Impact Assessment, available at: http://ec.europa.eu/environment/archives/air/pdf/Impact_assessment_en.pdf.

² APHEKON (Improving Knowledge and Communication for Decision Making on Air Pollution and Health in Europe) project, available at: <http://www.aphek.com/web/aphek.com.org/home;jsessionid=236A8057B5218F73AD9A587954EDEB3D>.

In light of the essential health, environmental and economic benefits that could result from a more ambitious NEC directive, we call upon the Members of the ENVI Committee to support:

1. Significantly stricter emission reduction commitments for 2025 and 2030: the ambition level should ensure the achievement of WHO recommended levels by 2030, therefore helping the European Union to reach its long-standing aim of achieving “levels of air quality that do not give rise to significant negative impacts on, and risks to human health and environment”, an aim which is enshrined in the EU’s 7th Environmental Action Programme. A recent European Parliamentary Research Service’s impact assessment also demonstrates that more ambition is possible and can be achieved at the same or lower cost³;
2. Stricter emission reduction commitments for 2020, based on the most recent baseline figures and establishing a linear pathway towards the achievement of the 2025 and 2030 commitments;
3. Legally binding emission reduction commitments for 2025 for all pollutants covered by the directive;
4. Legally binding emission reduction commitments for methane and mercury for all three targets years (2020, 2025 and 2030): currently, methane reductions targets are set only for 2030, despite the fact that methane contributes to toxic ground-level ozone, while mercury is left out of the Commission’s proposal despite being a toxic and highly trans-boundary pollutant causing great damage to health and ecosystems.
5. The rejection of flexibilities such as adjustment of emission inventories and offsetting of emissions between land and sea.

In view of the public interest in this matter, we urge you to take the above-mentioned concerns into account in your discussion. We thank you in advance for your availability and support.

Yours sincerely,

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³ Complementary Impact Assessment on interactions between EU air quality policy and climate and energy policy, available at: http://www.europarl.europa.eu/RegData/etudes/STUD/2014/528802/EPRS_STU%282014%29528802_REV1_EN.pdf.