



Brussels, 18 March 2021

To:
Janez Kopač, Director, Energy Community Secretariat

CC:
Olivér Várhelyi, EU Commissioner for Neighbourhood and Enlargement Negotiations
Virginijus Sinkevičius, EU Commissioner for Environment
Kadri Simson, EU Commissioner for Energy
Vladimír Bilčík, MEP rapporteur for Serbia
Paulo Rangel, MEP rapporteur for Bosnia and Herzegovina
Ilhan Kyuchyuk, MEP rapporteur for North Macedonia
Viola von Cramon-Taubadel, MEP rapporteur for Kosovo

Swift action on Contracting Parties' failure to reduce emissions for coal plants under the National Emission Reduction Plans

Dear Director Janez Kopač,

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL has been working for clean air and healthy energy in the Western Balkans region for several years now. We are actively following the status of the implementation of National Emission Reduction Plans (NERPs) and the compliance with opt-out lists of the Contracting Parties.

Health & Environment Alliance, Europe Beyond Coal, Climate Action Network Europe, Belgrade Open School, The Green Tank, Centar za ekologiju i energiju and CEKOR are writing to express our serious concerns about the failure of Bosnia and Herzegovina, Kosovo, North Macedonia and Serbia in reducing emissions from large combustion plants, including coal power plants, as foreseen under the National Emission Reductions Plans (NERP).

According to the recent "Energy Community Secretariat's WB6 Energy Transition Tracker 02/2021", these four Contracting Parties do not comply with the emission ceiling under the National Emission Reduction Plan for one or several pollutants, sulphur dioxide (SO₂), nitrogen dioxide (NO₂) and/or dust, which they should have already done since 2018.

This failure to comply is a missed opportunity to prevent disease and reduce the unacceptably high health burden in the region and in the EU, and to prevent avoidable deaths each year. The transboundary effects of coal power plant pollution from the Western Balkans are significant, with EU citizens bearing more than half of health impacts and costs.

Air pollution from coal power plants in the Western Balkans is a significant public health challenge. As the Directive 2001/80/EC and the NERPs took effect in 2018, compliance with emission reductions would have saved 7,504 lives and up to 17.03 million EUR in healthcare costs¹.

However, the major Western Balkan emitters did not reduce their emissions to the ceiling levels, and coal plants have been producing enormous amounts of air pollution. SO₂ and dust pollution are the main problems, with coal plants emitting 20 times more SO₂ and dust than the average EU plant.

Regrettably, energy policy decision-makers in the region continue to ignore the huge health burden from coal power generation, neglecting their obligations to reduce emissions.

We therefore welcome the launch of the dispute settlement procedures against the four Contracting Parties for delayed implementation of NERPs, and urge Contracting Parties to respect their obligations for emission reductions as soon as possible².

All of the Western Balkans Contracting Parties have signed the Declaration on the Green Agenda for the Western Balkans in Sofia last year, which sets the decarbonization goal for the region. Closing coal power plants in the region should be seen as an ultimate goal of the decarbonization pathway. The economy-wide decarbonization of the region also needs to include the provisions of the EU Industrial Emissions Directive in its acquis, as we have stated previously³.

¹ HEAL. Chronic coal pollution <https://www.env-health.org/wp-content/uploads/2019/02/Chronic-Coal-Pollution-report.pdf>

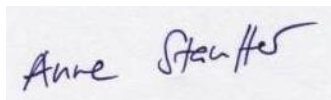
² Secretariat initiates dispute settlement procedures against four Contracting Parties in relation to NERPs <https://energy-community.org/news/Energy-Community-News/2021/03/16.html>

³ <https://bankwatch.org/wp-content/uploads/2020/11/DG-ENV-letter-on-IED-Chapter-II-and-IV-in-the-Energy-Community-Treaty.pdf>

This would support the efforts that the Secretariat has taken for setting decarbonization as a priority with the Treaty Contracting Parties, thus guaranteeing a sustainable and healthy energy transition towards a pan-European market.

To protect people's health in the European region, the timely compliance with Directive 2001/80/EC by all contracting Parties is of utmost importance, without any exemptions or delays.

Sincerely,

A handwritten signature in blue ink that reads "Anne Stauffer". The signature is written in a cursive style with a long horizontal stroke at the end.

Anne Stauffer

Director for Strategy and Campaigns

Health and Environment Alliance (HEAL)

On behalf of:

Europe Beyond Coal

Climate Action Network Europe

Belgrade Open School, Serbia

The Green Tank, Greece

Centar za ekologiju i energiju, BiH

CEKOR, Serbia