

HEAL COMMENTS ON THE DRAFT PROGRAMME OF AIR PROTECTION OF THE REPUBLIC OF SERBIA, FOR THE PERIOD 2022 – 2030 WITH AN ACTION PLAN

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation working for better health through a healthier environment in the European region and beyond. Our alliance brings together over 90 member organisations from 26 countries in the European region, and good air quality outdoors and indoors has been our priority since HEAL was founded in 2003.

In Serbia as elsewhere in the Western Balkans region, air pollution is the number one environmental threat to health, leading to an inacceptably large health burden. With the right political commitment and ambition, this health burden is largely preventable.

Recent assessments by the [World Health Organisation \(WHO\)](#) and new science, such as the [ELAPSE project](#), demonstrate the many health impacts from poor air quality, even at low levels. WHO now recommends much stricter maximum concentrations for PM2.5 and nitrogen dioxide (NO₂) especially.

THE DRAFT PROGRAMME OF AIR PROTECTION FOR THE REPUBLIC OF SERBIA – AN IMPORTANT STEP FOR BETTER HEALTH PROTECTION

HEAL welcomes the publication of the first draft of the [Programme of Air Protection of the Republic of Serbia](#) with an Action plan, and the vision presented in the Programme of ensuring that by 2030 everybody should be able to breathe clean ambient air.

For several years, HEAL and a range of health experts have [pointed out](#) the health toll of poor air quality in Serbia, and called for measures to cut pollution, especially from the energy sector. Now, the Republic of Serbia, with assistance from the IPA 2014 project "EU for a better environment - Additional development of EU environmental approximation for Air, Chemicals and Horizontal acquis", has finally acknowledged the impact of air pollution on human health and that action needs to be taken. Air pollution in Serbia has caused many health, environmental and economic losses in

the last few decades - it is time for Serbia to take the necessary steps that will lead to a healthier and more sustainable future for all.

HEAL is especially concerned about the finding that in urban areas and agglomerations air pollution has increased, with over 3 mio people living in areas where the air was too polluted and exceeded air pollution thresholds. The Programme also points out that Serbia's public electricity and heat production is the dominant source of SO₂ emissions, especially from burning lignite coal; and responsible for over 50% of NO_x emissions. Both pollutants therefore contribute to the formation of particulate matter (PM), which leads to high health impacts.

THE SETTING OF STRICT AIR QUALITY STANDARDS AND A SWIFT COAL PHASE OUT ARE ESSENTIAL FOR CLEARING UP THE AIR THAT PEOPLE BREATHE

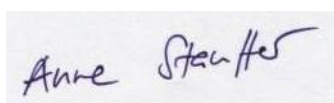
HEAL considers that the following aspects need to be strengthened in order to swiftly reduce the health burden of air pollution in Serbia:

- The draft Programme includes the full control scenario called WAM C. However, this scenario is not the most ambitious one, and outdated, as it refers to reaching the EU Directive 2008/50/EC, which is currently being revised. WHO has just published new recommendations for maximum air pollutant levels in the air, which are significantly lower than what DR 2008/50/EC is based on. Serbia's Air Programme needs to include a clear pathway and ambitious timeline for reaching the 2021 WHO air quality guidelines.
- The government acknowledges that coal power generation is the biggest air pollution source in the country. The foreseen vision of clean air in 2030 will only be achieved with setting a swift coal phase out date.
- The Programme does not address the linkages between air pollution and climate change, and the prioritisation of those measures that provide a triple win for our health, clean air and the climate. A more integrative approach should be considered, requiring the working together of various ministries and sectors in reaching the stated clean air objective, also considering the Green Agenda for the Western Balkans.
- Under an integrative approach, the application and implementation of all relevant EU legislation needs to be speeded up, and not delayed like in the [case of IPPC law](#).
- Cost and benefits: HEAL would like to underline that for all scenarios, the health economic benefits of clean air far outweigh the necessary technical control costs. The argument that the maximum feasible control scenario is too costly is not valid.
- The Programme and Action plan have to be legally binding in order to drive the necessary and overdue changes for cleaner air.

Health and medical professionals and civil society are key stakeholder when it comes to achieving clean air in the Republic of Serbia, and need to be involved in every step of the process.

HEAL is ready to provide further input in order to ensure that the final Programme will lead to a significant and swift reduction in the large health burden from polluted air.

Regards,



Anne Stauffer

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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 works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 90 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

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