



Brussels, 12 December 2023

Subject: Health groups coalition calls to accelerate action for clean air for health, instead of delaying

Dear Environment Minister,

Ahead of the next meeting of the Environment Council of the EU where you will exchange on the revision of the EU's clean air standards (Ambient Air Quality Directives - AAQD), we, the undersigned organisations, representing the European health sector, including medical doctors, healthcare professionals, patient organisations and health insurance funds, urge you to accelerate action to prevent disease and save on healthcare cost, instead of seeking exemptions and delays.

This means moving much closer to the position of the European Parliament on this key law for people's health, especially for vulnerable groups, and for tackling health inequalities.

We are highly concerned that the Council General Approach adopted in November 2023 would unnecessarily prolong and add to the existing health economic burden, and reinforce health inequalities through the following:

- Exemptions in keeping to new limit values would reinforce inequality, instead of reducing it (Article 18);
- Postponement in keeping to new limit values would contradict the urgency to protect health (Article 18)
- Modelling used as predictions for requesting exemptions could be misused to avoid health protective action where it is needed (Article 18)
- No explicit date for full alignment of the EU standards with WHO guidelines would show missing political will to prevent health harm (Annex I)
- Delaying, weakening, or failing to prepare Air Quality Plans would hamper the backbone of effective clean air action (Article 19, Annex VIII)
- Failing to monitor where and when it is needed would lead to inaccurate knowledge of air pollution (Annexes III, IV, VI, IX)
- Failing to ensure comparability and health messaging in public information would miss a key aspect of last resort health protection and support to the public (Article 22)
- If not regular and aiming at keeping legislation science based, the review clause would not be a review "mechanism" (Article 3)

Air pollution is the top environmental risk to health in Europe. Everyone is vulnerable to its impacts. Clean air is a question of political will, not an individual or lifestyle choice. Science-based EU revised clean air standards bring clear added value for everyone, but especially for those most at risk from air pollution, including children, people already suffering from disease and people facing health inequalities. The health of marginalised populations is significantly

affected by air pollution and the health of these people is under constant threat from air pollution.

The benefits of health and science-based clean air standards are crystal clear: clean air will prevent new disease and ill-health, and reduce the economic burden of treating disease. Clean air will bring significant healthcare cost savings from reduced general practitioners (GP) and emergency visits. For Belgium alone, reaching air quality as recommended by the World Health Organization would save 43 million in health insurance cost annually from saved GP visits.

We look to you to enshrine your commitment to clean air, as expressed in previous Environment Council meetings, into tangible support for accelerated action under the AAQD, instead of delays and exemptions, and remain available for any questions and further information.

Yours sincerely,

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Dr Christiaan Keijzer, President, Standing Committee of European Doctors (CPME)

Dr Barbara Hoffmann, Advocacy Council Chair, European Respiratory Society (ERS)

Susanna Palkonen, Director, European Federation of Allergy and Airways Diseases Patients' Associations (EFA)

Xavier Brenez, CEO of the Belgian Independent Health Insurance Funds (MLOZ)

Dr Hanna Boogaard, Co-Chair, International Society for Environmental Epidemiology (ISEE) Europe Chapter

Dr Zorana Jovanovic Andersen, Chair of the Environment and Health Committee, European Respiratory Society (ERS)

Dr Milka Solokovic, Director, European Public Health Alliance (EPHA)

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