

15 October 2026

To: Members of the European Parliaments' Budget Committee and Budget Control Committee

EU budget performance: Increased transparency and accountability for people's health

Dear Members of the Budget Committee and Budget Control Committee,

On 19 October, you will be considering the draft report on *Establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities*.

The Health and Environment Alliance (HEAL) is an alliance of over 70 member organisations working for better health through a healthier environment. HEAL considers it crucial that the next EU budget provides the necessary investments for preventing disease and ill-health, and ensures adequate transparency and oversight on the tracking of this spending.

The Lancet Countdown Europe 2026 report confirms that people's health is threatened like never before from the triple crisis of climate change, biodiversity loss and pollution. Europe's four record-breaking heatwaves of 2026 caused at least 35,000 premature deaths. Climate- and pollution-related risks already cost the EU economy over €738 billion between 1980 and 2023.

Public financing is essential to prevent health impacts and cost from this triple crisis, and health and prevention should be at the centre of the EU MFF 2028-2034 negotiations.

HEAL calls on you to establish the following:

1. Prioritise climate and clean air investments

HEAL considers that the spending target of at least 35% across all headings is the minimum level of EU investments in climate and environment objectives. For people's health, it is key to keep the current level of EU investments in clean air objectives.

The current EU budget 2021-2027 dedicates 9.7% or €185.5 billion to clean air objectives, with 70% of this funding allocated under the temporary NextGeneration EU, and Cohesion funds. As EU member states will have to implement key clean air requirements in the next years), the next EU MFF is key to provide for major investments for implementation and help deliver on clean air.

Clean air is also a prerequisite for a more climate resilient Europe. In the next weeks, the European Commission is expected to launch a climate resilience framework and a European heatwave plan. This record heat summer has shown that the EU and member states are currently unprepared to address the reality and the scale of the climate-health emergency, with uneven progress on climate resilience and implementation which leaves vulnerable groups exposed to substantial impacts. While the climate and environmental mainstreaming target will in principle cover climate adaptation, HEAL considers it important to designate a budget line for health and climate resilience, to ensure targeted investments.

2. Ensure EU investments deliver health benefits

Investments in the EU budget should only be for interventions that do not contribute to significant harm to the environment and deliver at-source reduction of air pollution.

HEAL is concerned about several interventions in Annex I of the Performance Regulation that could lead to an increase in the health costs of air pollution and undermine implementation.

Wood burning for electricity generation, including for heating systems in existing buildings, is a fast-growing source of air pollution in cities, and should not receive EU funding. Interventions for *air quality improvements* should cover the whole range of key air pollutants including sulphur dioxide (SO₂), methane (CH₄), and ammonia (NH₃), as these pollutants contribute to a significant burden of disease and health cost.

The (revised) Do No Significant Harm (DNSH) guidance should be applied consistently across to the entire MFF. In the upcoming DNSH guidance, which will be applicable for the MFF 2028–2034, a number of activities and interventions should be excluded that undermine climate resilience, environmental protection and public health. These include fossil fuel subsidies, wood burning, ammonia and methane emitting practices, and PFAS chemicals polluting activities.

3. Ensure effective and consistent tracking of healthy investments

Tracking how public money is spent is an important element of transparency. A dedicated at-source tracking methodology for clean air would ensure consistent traceability of EU spending across multiple programmes and countries and would contribute to performance assessments.

The proposed Performance Regulation is set to track the 35% climate and environmental mainstreaming target through a single set of rules. The current EU budget 2021–2027 already tracks EU investments in clean air through a [dedicated methodology](#), mirroring the methodology used for climate and biodiversity. However, this methodology is incomplete, given that it focuses on one clean air legislation only (on emission reductions).

To ensure effective and consistent reporting of EU and national investments to clean air objectives across all headings and National Regional and Investment Plans, the next EU budget should include a robust at-source tracking methodology, supported by health-benefits indicators.

Further information is available below. We are available for any clarification. Please see HEAL's position on the EU MFF [here](#).

Yours sincerely,

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Health and Environment Alliance (HEAL)

Annex

[The Lancet Countdown Europe 2026 report](#) confirms that people's health is threatened like never before from climate change, biodiversity loss and pollution. [One in ten premature deaths](#) in the EU are linked to pollution; exposure to endocrine disrupting chemicals results in up to [€163 billion in health cost per year](#). Climate and pollution-related risks already cost the EU economy over [€738 billion](#) between 1980 and 2023. Air pollution, the top environmental threat to health in the EU, not only is a major burden for our health, but also for public finances; air pollution causes an estimated [€290-950 billion per year](#) by 2030 in health damages and burden already straining health care systems in EU member states;

The next EU budget can help prevent a large share of Europe's pollution-related chronic disease burden, responsible for [10% of all premature deaths](#), including 18% of cardiovascular, 10% of cancer, and 30% of respiratory mortality.

Every euro invested in tackling pollution delivers returns far greater than its costs. Investing in clean air is estimated to return [7x of its value](#) thanks to lower healthcare expenditure, fewer crop yield losses due to ozone, fewer absences from work due to illness, and higher productivity at work.

Achieving the EU's zero pollution goals by 2030 alone will require closing an annual investment gap of [€40.7 billion every year](#), of which more than €32 billion would be needed for meeting clean air objectives for 2030.

Health and Environment Alliance aisbl

We are the leading not-for-profit organisation addressing how our environment affects health in the European Union and beyond. Supported by over 70 member organisations, HEAL brings independent and expert scientific evidence from the health community to European and global decision-making processes to inspire disease prevention strategies. HEAL'S EU Transparency Register Number: 00723343929-96

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