



## Air quality Initiative of Regions (AIR) position on the European Air Quality Package

### Overview

- AIR generally notes that many of the recommendations included in the AIR Position Paper have been reflected in the final proposals. In particular, the AIR Group welcome the recognition that Member States must work with their regions and cities if air quality is to be meaningfully improved and also note the need for action at regional and local level is needed.
- However, given the proven health impacts of poor air quality AIR continue to believe that addressing air pollution must be given further priority at all levels of government.
- AIR members remain committed to delivering air quality improvements in their own regions but this must be complemented by robust action taken at European and national government level.
- AIR welcome EU source based policies, and would welcome a more ambitious approach by the Commission.
- In finalizing the overall package European legislators should seek an appropriate balance between additional administrative burden and effectiveness. AIR propose an ambitious approach on defining best available techniques (BAT) at EU-level in all policy areas relevant to air quality.

### “A Clean Air Programme for Europe”

#### European emission standards

- The Commission is correct to identify the issues with European emission standards as one of the main explanations for the on-going lack of compliance with the EU legal limits across Europe.
- The Commission must ensure that the Euro 6 standard works effectively for cars, vans, heavy diesel vehicles and buses to reduce real world emissions under urban driving conditions (i.e. lower speeds, stop start conditions etc.). This must include a robust, realistic and effective real-world testing process.

- Only once it is clear that the Euro 6 standard has been effective can it be concluded that no stricter standards for vehicles are required. Specialist vehicle fleets may also require additional emission standards.

### **The local and regional air quality management toolbox**

- AIR welcome the provision of an enhanced local and regional air quality management toolbox. However, the Commission must recognise that expecting cities and regions to overcome the limitations of Euro 4 and 5 by accelerating the introduction of Euro 6 will impose significant additional financial The EU level must now play a key role in accelerating the introduction of Euro 6 and thus recognizing the efforts of the regions for the early introduction of Euro 4 and 5, which did not reduce NO<sub>x</sub> and NO<sub>2</sub> emissions as expected.
- The commitment to improving public information, both through new public-oriented indicators and consumer information on emissions, is welcome. However, any new indicators must be developed in partnership with the cities and regions.
- Regional authorities should have the power to tackle emission at source. A strong consistency between the EU air quality objectives and the market measures policies (like Ecodesign) is needed.

### **Air pollutants and carbon: a missed opportunity**

- AIR request that European legislators better align climate change policies with air quality policy.

### **Timings**

- focus on 2030 there should be renewed emphasis on 2025, including mandatory targets in the National Emissions Ceiling (NEC) Directive (see below). 2030 is too late to keep the link between national emission control strategies under the NEC Directive and local air quality planning, including under the Ambient Air Quality Directive. It would counteract the goal of better coordinating national and local air quality measures. However, this is only practicable if other European sources control measures and supporting action are in place early enough to support the delivery of this timescale.

### **Other sources**

- The AIR Group underlines the need for improvements in other sectors such as agriculture and inland shipping. Cost effective measures could be implemented here delivering significant air quality improvement on inland waterways and rivers many of which run through the hearts of our cities and urban areas.

## Ambient Air Quality Directive

- AIR note that the Commission has decided not to reopen the Ambient Air Quality Directive at this time. AIR agree that it is appropriate to focus on achieving existing air quality standards at this time and that these must be met as soon as possible.
- The AIR Group reiterates the comments made in its original position paper, in particular relating to compliance assessment (see attached)

## National Emission Ceilings Directive

- In the Commission's proposal, the proposed 2020 national emissions ceilings will be achieved without any additional national measures. Further binding emission targets are only proposed for 2030. Article 4 implies that reductions should be halfway between the 2020 and 2030 targets, i.e. 2025, but does not make them explicitly binding.
- To make meaningful progress in improving urban air quality, the next step of legally binding national emission ceilings should apply in 2025 instead of 2030. Article 4 and Annex II should be revised accordingly.
- This should be complemented by supporting EU action and source control measures. Emission ceilings in 2025 can be achieved cost-effectively.
- AIR welcome the inclusion of particulate matter (PM) within the scope of the directive.

## Medium Combustion Plant Directive

- Where Member States have already put in place tighter limits these should be in no way limited by the Medium Combustion Plant Directive.
- In general the directive should be aiming to support the adoption of the best available technologies in reducing emissions from combustion plants.
- The emission limit values (ELV) should be graduated according to power ranges, in addition to type of fuel and type of installation that this directive proposal considered.
- AIR consider that the EU legislation should establish an emission limit value for carbon monoxide (CO) because it ensures that there is effective combustion and that the installation works efficiently.
- Gaseous fuels with low sulphur content (such as propane, butane etc) should be subject to the same limits as for natural gas.
- Effective monitoring systems should be a requirement of the directive for installation with thermal input equal to or greater than 20 MWt. The quality of the data provided for these continuous measurement systems are much more reliable than periodic data measured in a short period of time.

## Funding

- The AIR Group welcome is required at regional level if air quality improvements are going to be implemented in those cities and urban areas where it is most needed.
- We welcome that the Commission has enabled Member States to draw on finance under the 2014-2020 European Structural and Investments Funds (ESIF) and the new LIFE instrument for 2014-2020.
- We note that the Commission proposed that the ESIF includes an air quality component, in particular for urban areas. It is now imperative that this is delivered in the various national operational programmes. This should also include provision for supporting green transport.
- In general the AIR Group improving air quality and underlines the need for continuous support (financial and technical) from the Commission to achieve the proposed limit values.