

# AIR position paper on the revision of the Air Quality Directive

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#### Background

- The Air Quality Initiative of Regions (AIR) was founded in 2011 and represents
   12 regions from seven European Union (EU) Member States.
- These are: Baden-Württemberg, Catalunya, Emilia-Romagna, Greater London, Hessen, Lombardia, North Rhine-Westphalia, Piemonte, Randstad, Steiermark, Veneto and Vlaanderen.
- Together these regions represent 22% of EU GDP and 18% of the EU's population (87.6 million inhabitants).
- These regions, which include the most densely populated and industrialised areas of the EU, have been at the forefront of air quality management over recent years.
- However, despite these efforts, these regions, like many others in the EU, are struggling to meet some of the limit and target values set in the Air Quality Directive.
- AIR welcomes the European Commission's review of air pollution policy, which was launched on 30 June 2011.
- At a conference in Brussels on 10 November 2011 organised by AIR, the group committed to work with all European institutions to contribute a regional perspective to the review of the Air Quality Directive.
- The position paper sets out AIR's priorities for the review.

#### Overview

Protecting human health

**EU limit values** 

Compliance process

Compliance assessment

**EU-level action** 

#### Protecting human health

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**EU-level action** 

- Given the proven health impacts of poor air quality AIR believes European citizens have a right to clean air.
- AIR members are committed to delivering improvements in air quality in their regions.
- They look to the European
   Commission to put in place an appropriate legal framework which focuses on protecting human health.

#### **EU limit values**

Protecting human health

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- Simplification of the limit value regime should ensure action is targeted where there are the greatest impacts on human health.
- The selection of limit values should be determined by the available health evidence.
- AIR also believes simplification would aid effective communication of priorities to the public and policy makers.

#### Compliance process

Protecting human health

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- Where all reasonable and proportionate action has been taken this should be considered in the compliance process.
- For NO2 this should reflect the failure of recent Euro standards to reduce NO<sub>x</sub> emissions from road vehicles as expected.
- As a consequence there is an absence of measures not entailing disproportionate costs to address the large compliance gaps that are now being seen.

## Compliance assessment (1)

Protecting human health

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- Compliance assessment of limit values should be based on monitoring supported by modelling, focusing on those areas where there is relevant human exposure.
- Where monitoring data is used this should cover a longer time period than a single year to reflect meteorological fluctuations and other variations.
- Transboundary pollution, geographical and meteorological conditions should be considered as well.

## Compliance assessment (2)

Protecting human health

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**EU-level action** 

- Where exposure concentration obligations and exposure reduction targets are used member states and regions should have flexibility in choosing which are the most appropriate areas.
- Modelling standards should be introduced and harmonised where possible and emissions databases improved, while maintaining flexibility.

### EU-level action (1)

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- Sectoral emission standards (eg. Euro standards) should be introduced as soon as feasibly possible and the timescales linked to limit value compliance dates.
- Further support should be offered by the European Commission to incentivise their early adoption.
- Action at EU level is needed to promote energy efficiency and control all relevant emissions.

#### EU-level action (2)

Protecting human health

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**EU-level** action

- There should be greater consistency in Europeanlevel environmental policy to prevent any contradictory effects on air quality.
- Air quality should be made a specific priority within EU funding.

#### EU-wide co-operation

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- The Commission should help reduce transboundary pollution by bringing Member States and regions together.
- Through the AIR Group and other fora, regions and cities are keen to share their experiences to maximise the application of best practice at regional level across the European Union.
- The Commission should identify appropriate ways of supporting and encouraging such activities.