



**European Committee
of the Regions**

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OUTLOOK OPINION

The future of EU Clean Air Policy in the framework of the zero-pollution ambition

THE EUROPEAN COMMITTEE OF THE REGIONS

- notes that air pollution is still the largest environmental health risk in the EU, responsible for nearly 500 000 premature deaths each year. Air pollution is linked to respiratory and cardiovascular diseases, strokes and cancer. It also has significant adverse effects on the climate, ecosystems, the built environment – including cultural heritage – and the economy;
- points to the importance of including the lessons of the COVID-19 pandemic in future policies. On the one hand, there is a possible link between air pollution and the gravity of the consequences of infection with the COVID-19 virus; therefore fighting air pollution must be amongst the top priorities of the EU recovery plan. On the other hand, significantly reduced traffic, industrial production and other activities during curfews resulted in significantly less air and noise pollution. Citizens could see more clearly that a healthier environment, less traffic, more open public spaces and nature-based solutions are essential for their well-being. There is strong support for this historic opportunity to build something better;
- supports the European Commission's announcement to propose to more closely align air quality standards to the WHO guidelines, which are currently being revised but draws its attention to the following considerations. Taking into account the high number of Member States that do not meet current standards, it is appropriate to provide for further assistance for implementation where necessary and appropriate and strictly monitored compliance timeframes. The CoR considers emissions rules to be a particularly effective approach, and recommends therefore that more attention be paid to tightening them; at the same time, the CoR welcomes that some Member States, regions or cities can and do already apply stricter limit values on their own initiative if they so wish;
- emphasises the need to focus more on emissions regulation as a better way of achieving clean air by reducing emissions at source (pollution prevention). The NEC directive sets ambitious reduction commitments for the Member States, but EU-wide sectoral regulations are also needed. EU legislation can ensure a more level playing-field, as stricter local emissions reduction requirements may have adverse economic effects. EU legislation should also prevent pollution being shifted to another location.

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Reference document

Outlook opinion

Outlook opinion of the Committee of the Regions - The future of EU Clean Air Policy in the framework of the zero-pollution ambition

I. POLICY RECOMMENDATIONS

THE EUROPEAN COMMITTEE OF THE REGIONS

Introductory remarks

1. welcomes the European Green Deal¹ proposed by the new European Commission, the zero-pollution ambition for a toxic-free environment – one of three priorities mentioned by the new Commissioner for the Environment – and above all the zero-pollution action plan for air, water and soil to be adopted in 2021;
2. notes the increasing public support in the EU for ambitious action to improve air quality, as reported by the 2019 Special Eurobarometer survey on attitudes towards air quality. Growing concern about air pollution in a context of intense youth mobilisation for the environment is the starting-point for ambitious action in this area;
3. notes that air pollution is still the largest environmental health risk in the EU, responsible for nearly 500 000°premature deaths (ten times the toll of road traffic accidents) each year. Air pollution is linked to respiratory and cardiovascular diseases, strokes and cancer. It also has significant adverse effects on the climate, ecosystems, the built environment – including cultural heritage – and the economy;
4. points to the importance of including the lessons of the COVID-19 pandemic in future policies. On the one hand, there is a possible link between air pollution and the gravity of the consequences of infection with the COVID-19 virus²; therefore fighting air pollution must be amongst top priorities of the EU recovery plan. On the other hand, significantly reduced traffic, industrial production and other activities during curfews resulted in significantly less air and noise pollution. Citizens could see more clearly that a healthier environment, less traffic, more open public spaces and nature-based solutions are essential for their well-being. There is strong support for this historic opportunity to build something better;
5. observes that air quality in Europe has continued to improve gradually over recent years, but that many Member States are not meeting the current standards, with more than half of them currently subject to infringement procedures. Also notes that the levels of fine particulate matter (PM2.5), one of the most hazardous forms of air pollution to the human respiratory system, have not dropped in Europe significantly;

¹ https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en.

² According to the recently published study *Assessing nitrogen dioxide (NO2) levels as a contributing factor to coronavirus (COVID-19) fatality*, 78% of the 4 443 deaths were in four regions in northern Italy and one around Madrid in Spain. These five regions had the worst combination of NO2 levels and airflow conditions that prevented dispersal of air pollution.

6. appreciates the work being done by Member States, European institutions and international organisations in assessing and addressing air pollution³;
7. reiterates its call for an integrated approach, an ambitious European source-based policy, and links between immissions and emissions policies in terms of both ambitions and timeframes⁴. Calls to take into account the conclusions of the CoR Regional Hubs⁵ consultation that looked into the implementation of the EU Ambient Air Quality (AAQ) and the National Emission Ceilings (NEC) Directives as well as the recommendations from its opinion on *Towards an 8th Environment Action Programme*⁶;
8. recalls the particular responsibility of local and regional authorities in this area for future generations, as well as today's citizens, especially more vulnerable groups, and therefore is convinced, based on the experience throughout the COVID-19 crisis that change is possible. Makes therefore the following recommendations;

Possible new initiatives

Legislative measures

9. notes the finding of the Fitness Check that the AAQ directives have been partially effective in improving air quality but that there is further room for improvement. The CoR recommends that during such revision the possible inclusion of ultrafine particles (UFP) and black carbon (BC), both with elevated adverse health effects, should be taken into consideration, based on recommendations by the WHO. Also with respect to health effects, the focus should shift from assessing air quality to measuring people's exposure to air pollution; looks forward to the relevant legislative proposals in due course and will contribute to these procedures if and when appropriate with suggestions from the local and regional point of view;
10. agrees that current rules on monitoring provide a good basis for obtaining comparable, reliable air-quality measurement data. However, monitoring systems designated by individual Member States should be further harmonised. The CoR recommends involving local and regional authorities (LRAs) more closely in designating the location of specific measurement sites;
11. notes, as reported by the European Court of Auditors, that the EU's air quality standards were set almost 20°years ago and that some of these are much weaker than WHO guidelines and the level recommended by the latest scientific evidence on human health impacts;

³ The European Commission has developed and implemented the EU Clean Air policy framework further: the National Emission reduction Commitments (NEC) directive, which replaced the National Emission Ceilings directive, introduced emission reduction requirements for 2020-2029 and from 2030 onwards; the Clean Air Forum has proved a successful platform for discussion of air quality; and the conclusions of the Fitness Check of the Ambient Air Quality (AAQ) Directives have been published. The Council of the EU recently adopted conclusions on the Improvement of Air Quality. The European Court of Auditors has published a special report on Air pollution: Our health still insufficiently protected, and the World Health Organization (WHO) is currently revising its air quality guidelines with a view to the possible release of new guidelines in 2021.

⁴ *The Clean Air Policy Package for Europe* <https://cor.europa.eu/en/our-work/Pages/OpinionTimeline.aspx?opIdMR-1217-2014>.

⁵ <https://cor.europa.eu/en/news/Pages/consultation-air-quality.aspx>.

⁶ [CDR 1672/2018](https://cor.europa.eu/en/news/Pages/consultation-air-quality.aspx).

12. supports the European Commission's announcement to propose to more closely align air quality standards to the WHO guidelines, which are currently being revised but draws its attention to the following considerations. Taking into account the high number of Member States that do not meet current standards, it is appropriate to provide for further assistance for implementation where necessary and appropriate and strictly monitored compliance timeframes. The CoR considers emissions rules to be a particularly effective approach, and recommends therefore that more attention be paid to tightening them; at the same time, the CoR welcomes that some Member States, regions or cities can and do already apply stricter limit values on their own initiative if they so wish;
13. emphasises the need to focus more on emissions regulation as a better way of achieving clean air by reducing emissions at source (pollution prevention). The NEC directive sets ambitious reduction commitments for the Member States, but EU-wide sectoral regulations are also needed. EU legislation can ensure a more level playing-field, as stricter local emissions reduction requirements may have adverse economic effects. EU legislation should also prevent pollution being shifted to another location, e.g. between neighbouring cities, countries or continents or by exporting diesel cars from Western European cities that ban their use to Eastern Europe, Africa or other parts of the world. Certain areas where there has been no recent regulation should receive more attention: these include (inland) shipping, non-exhaust road transport emissions (brake and tyre wear), diesel (urban power) generators, aviation, or small (<1 MW_{th}) combustion plants such as residential wood- and coal-burning stoves and boilers. Special attention has to be given to real-drive and real-use conditions;

Funding

14. points out that there is a general lack of specifically targeted EU funding for air quality measures, for drafting and implementation of Air Quality Plans, and for real-time air quality monitoring and improvement in general. The process of obtaining funding is also considered difficult, so this must be substantially simplified to ensure that calls for funding are successful. Collection of financial resources for this funding should be based on the polluter-pays principle;
15. notes that severe particulate matter pollution affects in particular large urban agglomerations, heavily industrialised regions and the poorest areas in the EU, which, in many cases, also face energy poverty. Therefore, sectoral transitions (agriculture, transport, industry and energy) and air pollution should be handled in an integrated way, applying tailor-made approach. Funding is essential, as success in implementing air quality programmes is significantly influenced by financial resources. In addition, some regions suffer not just from unfavourable socio-economic conditions, but also from adverse geographical or climate situations, and therefore need additional support to combat air pollution;
16. underlines the challenges of the transition towards sustainability, including improving air quality, for local and regional communities. The CoR welcomes the EC Communication on *The EU budget powering the recovery plan for Europe* and calls on the Commission to simplify and increase access to EU funding opportunities, in particular the ERDF, LIFE, EAFRD, and the Just Transition Fund, as means to achieve wider objectives benefitting also air quality, especially those included in the air quality plans under the AAQ directives. In this context it is

crucial to ensure coherence between projects funded by the EU and policies of national, regional and local authorities, in order to maximise their impacts; therefore calls on the Member States, as well as the European Commission to promote the close cooperation with local and regional level authorities in developing the appropriate strategies, policies and programmes;

17. calls for the introduction of incentives or recognition for LRAs performing positively;

Improving implementation

Multilevel governance, cooperation, implementation and enforcement

18. notes that the Fitness Check mentions problems with implementation, pointing out that deficient air-quality plans and Member States' lack of commitment to taking appropriate measures have resulted in substantial delays in meeting air-quality standards; points out that a major reason for the limited efficacy of air-quality plans has been the earlier EU vehicle emission limits, which were not fitted to real-world driving;
19. observes that air pollution has different sources: natural, transboundary, national, regional and local (also street-level). To combat air pollution, emissions at all levels should be decreased so that each level takes its own share of the responsibility. Effective improvement will require close and more effective cooperation and communication between different levels of government. Regional authorities could play a coordinating role between the local and national level, and good practices should be collected and disseminated. Cooperation should be extended to include companies, scientific bodies, and other relevant stakeholders, as well as the general public;
20. notes that specific tools like TAIEX-EIR Peer-to-Peer are already available and being used successfully by several Member States and LRAs;
21. welcomes the efforts to conclude an international agreement against transboundary air pollution. Both the European Commission and the Member States are closely involved in certain working groups, task forces and cooperation programmes under the Convention on Long-range Transboundary Air Pollution (CLRTAP) (or shortly Air Convention under the United Nations Economic Commission for Europe (UNECE). The CoR also welcomes the launch last year of the Forum for International Cooperation on Air Pollution, which could accelerate improvement in air quality all over the world by disseminating and sharing knowledge gathered to date; stresses also that trans-border cooperation between local and regional authorities (both within the EU and across the EU's external borders) can be important and that the instrument of the European Grouping of Territorial Cooperation (EGTC) may provide a useful framework for such initiatives;
22. highlights the need for cross-sectoral cooperation and coherence of relevant policy areas. Measures should address all sources of air pollution in an integrated way: transport (both road and non-road), energy (including domestic heating), agriculture sectors and industry, while taking into account other relevant areas such as climate change or health. These policies could be reciprocally beneficial (e.g. energy-saving measures), but in some cases policies (e.g.

promoting biomass combustion or supporting diesel cars) could have negative impacts on air quality. Synergies should be harnessed and counterproductive provisions avoided. All relevant measures of the European Green Deal should be used to help achieve the current air-quality objectives: not just the Zero Pollution Action Plan but also the Biodiversity Strategy for 2030, the "Farm to Fork" strategy, the Circular Economy Action Plan, Sustainable and Smart Mobility, and the Climate Law;

23. notes that agriculture so far is the least effective sector when it comes to decreasing emissions (ammonia is a particulate matter precursor). Although measures to mitigate emissions in agriculture are already available, and technically and economically viable, such measures are not yet widely used. Having undergone a series of reforms to enhance its environmental sustainability, the CAP should serve these goals better. New or stricter measures should be considered during the negotiations on the future of the CAP beyond 2020 including, for example, eco-schemes;
24. welcomes the European Commission's intention to take further action towards zero-emissions mobility; harmonisation of Low and even more Zero Emission Zones throughout Europe should be considered. Aware of the fact that reduction of pollution in lockdown areas during COVID-19 is temporary, cities have already taken action to lower the effect of traffic – they widened pavements, designated micro-mobility lanes, lowered speed limits etc. It also became visible that public transport companies should be urgently provided with (EU) funding to keep them running, renew fleets with less polluting vehicles and prevent a shift to private motorised transport. Underlines that the competitiveness of EU manufacturers must be taken into account when considering and proposing more stringent emissions standards for petrol and diesel vehicles – while calls for an exit path of internal combustion engines from road traffic and appreciates the Member States, regions and cities that have already set a final date for the admission of cars with internal combustion engines. The CoR opposes premiums for the purchase of vehicles with such engines. Proposes, among others, to further promote zero-emission vehicle technology and accelerate investment in the European rail network also as one of the possible viable alternatives for the commuters;
25. draws attention to the problem of residential solid-fuel heating. The existing ecodesign legislation does not seem to provide an appropriate solution; therefore expects the European Commission to address this issue in the context of the sustainable product-related initiatives under the circular economy strategy. Moreover, significant support is needed for people on low incomes (energy poverty), not just to replace old appliances but also to ensure affordable operation and maintenance of more energy-efficient appliances; ad hoc incentives for renovating buildings to improve their energy performance should be looked at as well. The European Commission should also consider introducing rules on the quality of fuels used for residential heating and create appropriate incentives, including financial incentives, for this purpose;
26. encourages Member States to deliver and update their National Air Pollution Control Programmes as a matter of urgency and to take LRAs' contributions on board when drawing up and revising the programmes;

Public engagement

27. notes that more use should be made of existing IT solutions, mobile phone applications and other relevant tools to inform the public, making the "invisible killer" visible so as to increase public awareness. Information should be easy to understand and access, and should include health aspects. The current website of the European Air Quality Index⁷ gives comprehensive information on air quality in Europe, but is relatively unknown and needs to be more widely publicised. The site should also be improved through modelling to give air quality information for regions, smaller villages, and rural areas, where air quality is not measured by monitoring stations;
28. recommends stepping up citizen science efforts. Citizen science applications cannot replace monitoring data, as they provide significantly lower quality of data, which needs to be made clear to the public but they can complement it by providing higher-resolution information on trends in air pollution, while actively involving the public and raising people's awareness. Research activities on enhancing (low-cost) sensor reliability should be supported and accelerated, also current work of the European Committee for Standardisation (CEN) on standards for compact air quality monitoring as well as air quality modelling is important and welcomed;
29. recommends informing the general public about both problems and improvements that demonstrate the potential positive outcomes of action, including the potential of zero-pollution forms of energy, such as renewable or nuclear energy, which will enable Member States and LRAs to garner support for measures;
30. points out that citizens have a major role to play in curbing air pollution, notably through changing their own behaviour in many different aspects of their lives, including mobility, heating, food, but also general consumption, which many of them are still largely unaware of (though public awareness varies considerably within the EU). Reducing emissions depends on this contribution, so citizens should be involved more closely in decision-making during development of air-quality plans and measures, from the earliest stage. In addition, air-quality plans should include not just regulatory measures, but also ones that promote and support people's awareness and behavioural changes in their mobility choices, such as driving less. LRAs can facilitate this work by using schemes like ClairCity. Urges however also for the recognition and wide dissemination of local initiatives, engaging citizens, such as tree planting and the creation of green walls in cities, cleaning and cooling the urban air;

Harmonisation, guidance and implementing acts

31. advocates further guidance on air-quality reporting and modelling that is specifically designed for LRAs, given their significant role in this sector. Reporting tools (including e-reporting) should take local authority needs into account. Local authorities might not always have staff with the necessary technical skills or the required English level. Improvements in e-reporting

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<http://airindex.eea.europa.eu>

should allow for the specificities of local and regional users, ensuring consistency between reporting tasks assigned to LRAs and their powers and resources in this sector;

Participation in networks and initiatives

32. recognises the high number of initiatives and networks already available that address issues of air pollution (Urban Agenda Partnership on Air Quality, the Expert Panel on Clean Air in Cities under the UNECE Air Convention⁸, the EU Clean Air Forum, the Covenant of Mayors, etc.). Many of these provide significant added value in clean-air policy, and the CoR would encourage LRAs to be more involved in these EU-level activities;
33. welcomes the new European Commission Green City Accord (GCA) initiative to improve implementation of EU environmental legislation. The GCA or the Technical Platform for Cooperation on the Environment set up by the CoR and the European Commission could be useful tools to steer LRAs towards the best initiatives based on their needs. These platforms should also help to collect and classify available tools, guidance documents or other relevant support available from the UNECE Air Convention, European Commission and its Joint Research Centre, European Environment Agency, or any other network or organisation that could help LRAs in their work on improving air quality. Special expertise and technical support (e.g. development of local emission inventories, designation of low emission zones, SHERPA model use, etc.) should also be provided, as LRAs need training to use these tools;

Next steps

34. urges the European Commission to further strengthen certain aspects of the emission rules at EU level and to take further steps to ensure effective and enhanced horizontal and vertical cooperation, while urging Member States and LRAs to find better methods of cooperation and communication;
35. recommends providing easily accessible air-quality funding for local authorities and accredited air quality associations responsible for air-quality plans in designated air-quality zones, with priority for zones with higher air pollution;

⁸ Convention on Long-Range Transboundary Air Pollution.

36. draws attention to the need to coordinate and manage the relevant networks, initiatives, tools and guidance, which are already a source of broad knowledge and experience, and which would help LRAs to improve their work to achieve cleaner air based on additional technical expertise and guidance.

Brussels, 2 July 2020

The President
of the European Committee of the Regions

Apostolos Tzitzikostas

The Secretary-General
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Petr Blížkovský

II. PROCEDURE

Title	The Future of EU Clean Air policy in the framework of the zero-pollution ambition
Reference(s)	Outlook opinion
Legal basis	Optional (outlook), Art. 307, 4ème al.
Procedural basis	Art. 41a
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Date of Bureau/President's decision	3 December 2019
Commission responsible	Commission for the Environment, Climate Change and Energy (ENVE)
Rapporteur	János Ádám KARÁCSONY (HU/EPP), Member of Tahitótfalu Council
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Previous Committee opinions	
Date of subsidiarity monitoring consultation	