

Consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies

Section 1/6: Introductory Questions

A. Are you responding to this consultation as an individual or on behalf of an organisation? -single choice reply-(compulsory)	On behalf of an organisation
A1. What type of organisation do you represent? -single choice reply-(compulsory)	business: industrial interest group, business association, sectoral association
A1a. Please specify the sector of your activity (e.g. health, environment, transport, energy, multi-sector): -open reply-(optional)	The purpose of AFEP is to present the views of the 100 largest French companies, mainly with regard to the drafting of non-sectoral legislation, notably on environmental issues.
A2. Does your organisation work mainly on an EU-wide basis or in a single country? -single choice reply-(compulsory)	Focus on a single country
A3. Please indicate the country where your organisation is located: -single choice reply-(compulsory)	France
A4. Please indicate the name of your organisation: -open reply-(compulsory)	AFEP - Association Française des Entreprises Privées (French Association of Large Companies)
A5. Please indicate your name and title: -open reply-(compulsory)	Mr François-Nicolas Boquet, Environment - Energy Director, and Ms Justine Richard, European Affairs Deputy Director
B. Do you now work on air pollution issues, or have you done so in the past? -single choice reply-(compulsory)	Yes, air pollution has been the main focus of my professional work

D. Please feel free to provide any further details regarding your answers to the introductory questions: -open reply-(**optional**)

Unless you specify otherwise, your contribution will be published on the Commission's website. Please indicate here if you wish your contribution to be anonymous.(For full information please refer to the Specific Privacy Statement point 3)

-single choice reply-(**compulsory**)

You can publish this contribution as it is.

Section 2/6: Ensuring compliance with EU air quality requirements and coherence with international commitments in the short term

1. How should the EU modify or supplement its approach to ensure compliance with current air quality legislation? (Please choose one or more responses) -multiple choices reply-(compulsory)	Additional non-legislative options: for example by establishing partnership agreements with MS that focus Member State efforts to address non-compliance with air quality objectives
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1a. Which options should be considered as additional non-legislative measures? (Please choose one or more responses) -multiple choices reply-(compulsory)	Governance support, for example through competence building programmes and guidance on increased and more effective use of existing EU funding sources
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2. Please feel free to provide written comments on the course of action to ensure compliance with the current air quality legislation: -open reply-(optional)
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EU Air Pollution obligations for 2020 should be those agreed under the Gothenburg Protocol.

Section 3/6: Further reducing exposure to damaging air pollution in the medium to long term

Sub-section 3.1: Ensuring coherence between air pollution and climate change policies

3. How should future EU air pollution policy interact with a new climate and energy framework for 2030? (Please choose one response) -single choice reply-(compulsory)	Other (please describe below in question 5)
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4. Should specific complementary action in the EU be pursued to curb emission of short-lived climate pollutants (SLCP) and their precursors, to improve both air quality impacts on health but also to boost climate mitigation in the short term? -single choice reply-(compulsory)	Yes
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4a. Should specific complementary action be pursued to curb black carbon emissions? (Please choose one response) -single choice reply-(optional)	Yes (please describe below in question 5)
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4b. Should specific action to address ozone precursors that are short-lived climate pollutants, such as methane, be reinforced? (Please choose one response) -single choice reply-(optional)	No
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5. Please feel free to provide comments on the interaction between air pollution and climate change policies: -open reply-(optional)

Q/3: Positive and negative correlations exist between climate change and air pollution issues. Some pollutants contribute to reduce climate change effects (for instance, micro-particulates have a negative impact on health but may have a positive impact in regard to climate change), whereas others worsen global warming. The Commission should thus conduct in depth assessments of the various impacts of those pollutants on the basis of reliable measurements, in order to identify relevant regulatory provisions. Before deciding to set up new regulations, the Commission should also assess the impact of already existing legislation on pollutants and the efficiency of those policies (for instance, impacts of the Eco-design and the Energy Efficiency Directives). Furthermore, no additional measures to reduce air emissions should be taken than those set for industry through implementation of the Industrial Emission Directive. AFEP supports the integrated approach of the IED. Q/4a: Regarding Black Carbon, consistently with Gothenburg Protocol, better knowledge should be acquired on monitoring, inventories and transboundary contributions. For now too little is known to allow setting any limit.

Sub-section 3.2a: Strategic approach and target year of future air pollution policy

6. Which target year should be the main focus of the revised Thematic Strategy? (Please choose one response) -single choice reply-(compulsory)	2030
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6a. If the target year is 2030, should the EU set an interim target for Member States to achieve for 2025 to strengthen the achievement of the 2030 objective? (Please choose one response) -single choice reply-(compulsory)	No, interim targets should not be set
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Sub-section 3.2b: Strategic approach and target year of future air pollution policy

7. How much additional progress should EU air pollution policy pursue in the revised Thematic Strategy? (Please choose one response) -single choice reply-(compulsory)	No change: only the level of protection delivered by current legislation
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8. Please feel free to provide comments on the level of ambition: -open reply-(**optional**)

Regarding sub-section 3.2a (question 6): 2030 could be the target year of the revised Thematic Strategy only if the use of models at EU level is improved. AFEP believes that a better governance of the overall "air quality models", such as Gains, should be implemented, enabling Member States and stakeholders to understand hypotheses used and to propose evolutions if they are well argued. The level of uncertainty of the models should be better explained and taken into account while establishing policies. In fact, an important effort should be made in order to share evenly between Member States representative key characteristics of the models and their limits. Regarding sub-section 3.2b (question 7): The Commission "Green paper on framing 2030 climate and energy policy" is expected to be published by DG Climate action and DG Energy in March or April 2013. The level delivered by this framework is still unknown. Furthermore, AFEP believes that the levels of ambition should be consistent with IED. It should also be reminded that already 4 out of the 6 targets of the current thematic strategy are reached.

Sub-section 3.3: Setting Priorities

9. How should EU air pollution policy give priority to addressing either human health or the environment? (Please choose one response) -single choice reply-(compulsory)	Other (Please describe below)
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10. Please feel free to provide comments on setting priorities: -open reply-(**optional**)

EU air pollution policy is very much linked to local situations where human health or environment must be first taken into consideration. It should focus on risk assessments which give information on risk occurring, exposure and dangers, and thus determine the level of priority. Priority should be given to improve hotspots in Europe. Major emission reductions have been achieved by industries and will continue with implementation of IED.

Sub-section 3.4: Choice of policy instruments

Negotiate new emission reduction commitments for 2030 under the Gothenburg Protocol which are aligned with the ambition level determined for the revised strategy. To be effective, this option would require action to ensure that EU neighbouring countries join and ratify the 2020 emission reduction targets. -single choice reply-(optional)	1
In the National Emissions Ceiling Directive, establish emission ceilings for the 2025-2030 period which are aligned with the ambition level determined for the revised strategy. -single choice reply-(optional)	3
In the Ambient Air Quality Directive, adapt the AQ limit values for the 2025-2030 period to more	4

stringent levels corresponding to the ambition level determined for the revised strategy. -single choice reply-(optional)	
In EU legislation on emission sources, set more stringent emission requirements for industrial activities, motor vehicles and other air pollution sources, where cost-effective. -single choice reply-(optional)	5
Use non-legislative methods, such as existing EU funding schemes, urban air quality programmes, research and innovation actions or awareness raising (please specify in following question). -single choice reply-(optional)	2
Other instruments (please provide comments in question 12). -single choice reply-(optional)	6

12. Which other instruments should be used? -open reply-(optional)

Section 4/6: Revising the Ambient Air Quality Directive

Sub-section 4.1a: Aligning with latest scientific and technical knowledge

13. Should the indicative limit value for PM _{2.5} of 20 µg/m ³ for 2020 be made mandatory? -single choice reply-(compulsory)	No
14. Should the PM _{2.5} or other limit values in the AAQD be made more stringent to bring them closer to WHO guidance values? (Please choose one response) -single choice reply-(compulsory)	No change

Sub-section 4.1b: Aligning with latest scientific and technical knowledge (black carbon)

15. Should monitoring and regulation be introduced for black carbon/elemental carbon? (Please choose one response) -single choice reply-(compulsory)	Yes, introduce monitoring requirement
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16. Should any other components of particulate matter be addressed in the AAQD?

-open reply-(optional)

Instead of a “monitoring requirement”, AFEP recommends to investigate sources of pollution in order to clearly define the type of pollutant. Research should be continued to better understand which is the most harmful fraction of PM₁₀. Furthermore, the difference between “black carbon” and “elemental carbon” should be clarified.

Sub-section 4.1c: Aligning with latest scientific and technical knowledge (ozone)

17. Which binding limit values (if any) should the AAQD set for ozone? (Please choose one)	No change
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response) -single choice reply-(compulsory)

Sub-section 4.2a: Management framework

18. Should any limit values be removed from the AAQD? If so, which? -open reply-(optional)

Yearly NO₂ limit values should be removed because the scientific justification of the sanitary impacts has not been established.

Sub-section 4.2b: Management framework

19. Should any *other* monitoring and reporting obligations be reduced in the AAQD? If so, which? -open reply-(optional)

Monitoring and reporting obligations should be reviewed according to (i) risk assessments, pollutant by pollutant, (ii) local contexts and (iii) measurements which have been observed. The Commission should introduce a flexibility allowing Member States to remove certain pollutants from the scope of the monitoring or reporting, if well justified.

Sub-section 4.2c: Management framework

20. Should zone-specific plans be consolidated into coordinated national plans? (Please choose one response) -single choice reply-(compulsory)

Don't know

21. Should cooperation among Member States be reinforced to better address transboundary pollution flows that affect local air quality problems? (Please choose one response) -single choice reply-(compulsory)

Yes, cooperation should be reinforced, but in other ways (pls specify in following question).

22. Please feel free to provide comments on the options for the revision of the AAQ Directive: -open reply-(optional)

EU revision should focus on the analysis of trans-boundary flow sources and the combined impacts of different pollutants in the atmosphere (atmospheric chemistry).

Section 5/6: Revising the National Emission Ceilings Directive (NECD)

Sub-section 5.1: Aligning with latest scientific and technical knowledge

23. Should national emission ceilings be adopted for black carbon/elemental carbon? (Please choose one response) -single choice reply-(optional)

No

24. Should national emissions ceilings be introduced for other new pollutants? (Please provide written comments if you would like to propose ceilings for other pollutants) -open reply-(optional)

No additional pollutant should be introduced.

Sub-section 5.2a: Management framework

25. Which mechanisms for flexibility should be introduced into the NEC Directive management framework? (Please choose one or more responses) -multiple choices reply-(optional)

Allowing Member State compliance for the Directive's ceilings to be measured on the basis of a multi-year average - Allowing limited adjustments of Member State emission ceilings, under specific circumstances and after approval by the Commission - Allowing limited adjustments of Member State emission inventories for compliance check, under specific circumstances and after approval by the Commission

Sub-section 5.2b: Management framework

26. Should coordination be required between the national and local levels in respect of emissions reduction measures and local air quality management? (Please choose one response)
-single choice reply-(**compulsory**)

Yes

27. Please feel free to provide comments on the options for the revision of the NEC Directive:
-open reply-(**optional**)

Flexibility measures, which have been introduced by the Gothenburg Protocol, should be transposed within EU Air Quality legislation. It is utmost important since a new pollutant (PM_{2,5}) will be introduced in the revised NECD for which data are still uncertain.

Section 6/6: Addressing major air pollution sources

Sub-section 6.1: Road transport

Introduce with minimum delay the new test procedure to ensure that real world emissions of Euro 6 light duty diesel vehicles are as close as possible to the type approval limit values
-single choice reply-(**optional**)

Strengthen EU-wide requirements for in-service compliance with emissions standards, to ensure that light-duty vehicles on European roads continue to produce low emissions over their lifetime -single choice reply-(**optional**)

Develop a new, more stringent standard to be mandatory for motor vehicles after 2020
-single choice reply-(**optional**)

Develop a supplementary more stringent standard, not mandatory, to be used by national and local governments in a harmonised way wherever air quality exceeds EU standards (e.g. to establish low emission zones), or to establish incentives at MS level to increase penetration of cleaner vehicles
-single choice reply-(**optional**)

Introduce standards to retrofit existing heavy duty vehicles (e.g. trucks, buses) to reduce their air pollution emissions -single choice reply-(**optional**)

Introduce a mandatory road charging scheme for heavy duty vehicles that incorporates air pollutant emissions ("eurovignette directive")
-single choice reply-(**optional**)

Develop additional test-cycle components specific to the driving patterns of special purpose urban vehicles (e.g. buses and refuse collection vehicles), to ensure that pollution control technologies operate effectively under real urban driving conditions

-single choice reply-(optional)	
Other (please provide comments in question 29)	
-single choice reply-(optional)	
No additional measures should be introduced	
-single choice reply-(optional)	
Don't know	
-single choice reply-(optional)	
29. Please feel free to comment on your answers regarding regulation of road transport emissions: -open reply-(optional)	
Sub-section 6.2: Off-road transport and non-road machinery	
Extend the scope of application of current Stage IV NRMM standards to additional power classes and applications, including stationary applications	
-single choice reply-(optional)	
Introduce as soon as possible a more stringent Stage V standard for non-road machinery, aligned with the limit values of the most stringent Euro VI regulation for heavy duty road vehicles, which would further reduce especially PM emissions.	
-single choice reply-(optional)	
Ensure that approval emission tests reflect the machinery's emissions in real world circumstances	
-single choice reply-(optional)	
Ensure that there are incentives for retrofitting and/or replacing older inland waterway vessels' engines by newer and cleaner ones	
-single choice reply-(optional)	
Other (please provide comments in question 31)	
-single choice reply-(optional)	
No additional measures should be introduced	
-single choice reply-(optional)	
Don't know	
-single choice reply-(optional)	
31. Please feel free to comment on your answers regarding regulation of emissions from off-road transport and non-road machinery: -open reply-(optional)	
Sub-section 6.3: Agricultural sector	
Set tighter emission ceilings for ammonia for 2020 and 2030 in the NEC Directive, leaving flexibility to Member States on how these ceilings can best be reached	
-single choice reply-(optional)	
Where cost effective, introduce new or revise existing EU legislation to establish EU-wide	

specific rules for e.g. improved manure storage, management and spreading techniques -single choice reply-(optional)	
Promote good practices in manure management and manure spreading in Member States through support from the Rural Development Fund -single choice reply-(optional)	
Introduce measures to ban or restrict the burning of agricultural waste -single choice reply-(optional)	
Other (please provide comments in question 33) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	
Don't know -single choice reply-(optional)	
33. Please feel free to comment on your answers regarding regulation of emissions from the agricultural sector: -open reply-(optional)	
Sub-section 6.4: Small/medium combustion sector	
34. Which additional measures should be taken to address air emissions from small and medium combustion installations (below 50 MW)? (Please choose one or more responses) -multiple choices reply-(optional)	
35. Please feel free to comment on your answers regarding regulation of emissions from the small/medium combustion sector: -open reply-(optional)	
Sub-section 6.5: Shipping sector	
36. Which additional measures should be taken to address air emissions from the shipping sector? (Please choose one or more responses) -multiple choices reply-(optional)	
37. Please feel free to comment on your answers regarding regulation of emissions from the shipping sector: -open reply-(optional)	
Final comments	
38. Please feel free to provide any further comments related to the revision of the Thematic Strategy on Air Pollution: -open reply-(optional)	