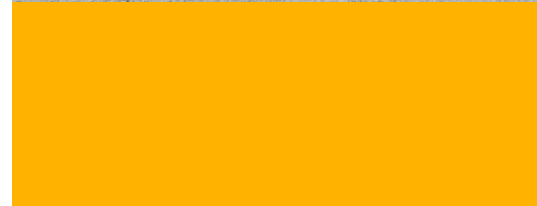


Eurocities position on the AAQ revision

Key points and first reactions on the proposal

Martin Lutz, Berlin,
Co-Chair of EuroCities' AQ Working Group




General ambitions on air quality

- Welcome the ambition of the European Commission to **get closer to WHO recommended levels**

- First milestone to be set in **2030** for major pollutants
- Ensuring a more regular **review of air quality standards every 5 years** based on the latest scientific evidence

😊 But it seems unclear which policy option actually underpins the AQS selection; The wording “**more closely aligned with WHO**” of the ZPAP points to **Option I-2**

The preferred policy package is set out below.

1. On air quality standards: which one has been chosen?
 - a. setting **clear** EU air quality standards, defined **as limit values for 2030**, based on a political choice between policy options ‘full alignment’ (I-1), ‘closer alignment’ (I-2) and ‘partial alignment’ (I-3), with a limited number of temporary exceptions where these are clearly warranted; 
 - b. pointing to a **post-2030 perspective for a full alignment with the 2021 WHO** Air Quality Guidelines, whilst getting on track towards alignment also with future WHO Guidelines to achieve the zero pollution vision **by the year 2050**;

😊 2030 **adequate** time-horizon for urban AQ management

😊 But lacks a **commitment** to evaluate the need for additional or tightened **source legislation** at Union level to prevent exceedances of the AQS or help improving the AQ further towards WHO

Capturing **new** developments on emerging **pollutants** of concern

- Include **monitoring requirements** for **ultra-fine particles, black carbon and ammonia** to collect significant amount of data in view of the regulation of these pollutants
- Support the development of relevant **measurement standards** to ensure a harmonised assessment of these pollutants across the EU

😊 UFP, BC, NH₃ and even basic PM speciation added, including the idea of super-sites, but..

☹️ Why (for BC, speciation) not at **hot spots** and only at background locations?

Annex VII introduces **monitoring of ultrafine particles (UFP)** at locations where high concentrations of UFP are likely, such as at or close to airports, ports, roads, industrial sites or domestic heating. Together with the information from monitoring UFP **background** concentrations at **monitoring supersites required** by Article 10, this will help to understand the contribution of different sources to UFP concentrations. Annex VII also **updates the list of volatile organic compounds (VOC)** recommended for measurements that aim to improve the **understanding of ozone formation** and management. 🙄

so, why no supersites at a few selected hot spots ?? also for BC measurements, given the strong spatial gradients of BC and UFP?

😊 Well addressed, also model application strengthened especially for compliance assessment

Addressing the current **flaws** on air quality objectives

- Legally **binding limit values** should be the **key** drivers to reduce air pollution in the EU (except for ozone)
- **Strengthen** the requirement for member states to **reduce** the **average exposure** of the population (**AEI**) at a **national** scale by turning the 'National PM2.5 exposure reduction target' into a **binding** 'National PM2.5 exposure reduction **obligation**' to be **attained** by 2030. A second non-binding step should be set by 2035 **synchronised** with revision of the **NEC-Directive** to secure the reduction of PM2.5 large scale background and eventually of the population exposure.

😊 addressed

😞 National requirements completely dropped, even though we badly **need national measures** to bring **down** the elevated large-scale **PM2.5 background** levels

👉 currently 10 µg/m³ in **remote rural** areas e.g. around Berlin, which is **>60%** of PM2.5 at a central **traffic spots**

Addressing the current **flaws** on air quality objectives

- **Lower** the **initial** concentration of the Average Exposure Reduction Obligation to a level below **5 $\mu\text{g}/\text{m}^3$** , recommended by the WHO guidelines.
- Consider the need to **complement** the **national** exposure reduction approach as well as the hotspot approach with a **third pillar** based on a **regional** exposure reduction objective (**RERO**).

😊 done

😊 **RERO defined** on a NUTS 1 spatial level by obliging regions to set out measures in a regional **Air Quality Plan** to achieve a **25% reduction of the AEI** of 2018-20 by 2028-30, **for PM2.5 and NO₂**

☹️ BUT, the burden rests **entirely** on the regional/lower level

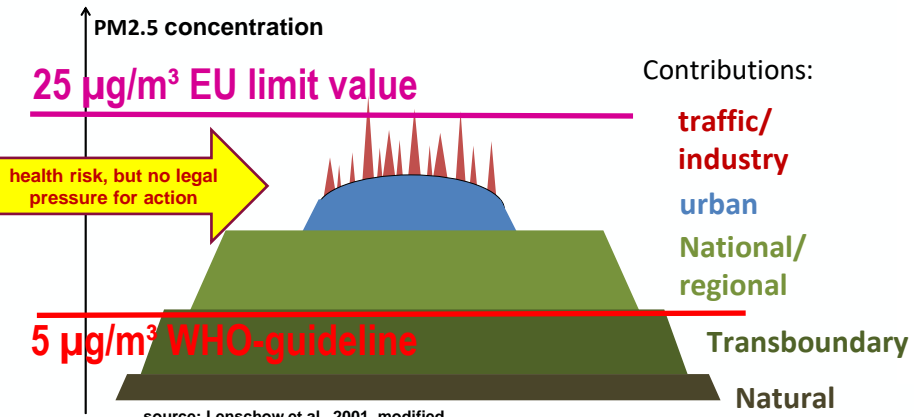
☹️ **Inadequate** especially for **PM2.5**; so please **keep** the **national** obligation, at least for larger member states

Challenges when revising the AQS

👉 large-scale background & governance

- Meeting new/revised AQ standards requires **concerted actions** on all levels
- responsibility for compliance should **not entirely** rest with **regions & local** authorities
 - the more so as **quite a few regulations relevant for local AQ management are made (also) on EU level !**

Schematic of PM2.5 contributions from different geographical origin

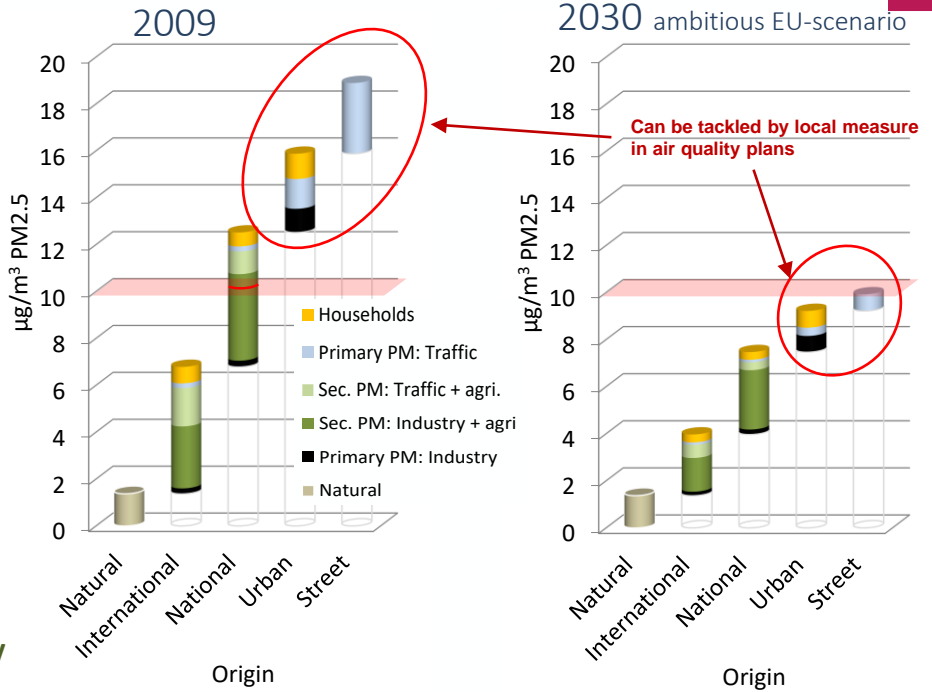


source: Lenschow et al., 2001, modified



Origin of PM2.5 in Germany

Average of 79 urban AIRBASE stations modelled in GAINS



source: Kiesewetter and Amann (2014), IIASA TSAP report #12

Climate law provisions as a template for the AQD

Art. 2

2. The relevant *Union institutions and the Member States* shall take the necessary measures at Union and national level, respectively, to enable the *collective achievement* of the climate-neutrality objective set out in paragraph 1, taking into account the importance of promoting both fairness and solidarity among Member States and *cost-effectiveness* in achieving this objective.

Art. 5

3. The relevant *Union institutions and the Member States* shall also ensure that *policies on adaptation in the Union and in Member States are coherent, mutually supportive, provide co-benefits for sectoral policies, and work towards better integration of adaptation to climate change in a consistent manner in all policy areas, including relevant socioeconomic and environmental policies and actions, where appropriate, ...*

Making air quality **governance** fit for cleaner air in Europe

- **Joint responsibility clause** between the EU & Member States on air quality to secure a consistent action, with a possibility for MS to request a revision of the relevant regulation
- Support the development of **collaboration mechanisms** between **national** and **sub-national** authorities

☹ Missing

Suggested Amendment of Article 3 on Responsibilities

1. The relevant **Union institutions** and the **Member States** shall take the necessary measures at Union and national, regional and local level, respectively, to **enable the collective achievement** of the **air quality objectives** as set out in Article 1 of this Directive, in particular
 - (a) the **measures** needed to further reduce the **large-scale regional background concentrations** especially of particulate matter pollution, which contribute also to the exposure of the urban population
 - (b) the **regulatory framework** needed to act in a **harmonized manner** on **national, regional and local** level in a **cost-effective** way, especially to meet the exposure reduction objectives laid down in ###

The suggested clause is **aligned** with the **Climate Law** which **acknowledges** the **shared responsibility** for greenhouse gas **emission control** between **MS and the EU**. Something **similar** is needed for **AQ** to achieve the large-scale background pollution reduction needed to mitigate the exposure of the urban population, i.e. to meet the RERO.

Back the revision of AAQ directives with ambitious **sectoral** regulation

- **Euro 7**

- Non-road mobile machinery directive: common marking for retrofitted products, EU-wide **retrofit** program, update **NRMM** standards
- Eco-design regulation: **update** the regulations asap and give more room of **manoeuvre** to local authorities to require **cleaner** heating devices

☹️ too **unambitious**; offering loopholes to label ICE and hybrid vehicles as seemingly cleaner (Euro7+AG), which will make implementation of ambitious ZEZ more difficult

☹️ not aware of any Commission initiatives despite being tasked by the NRMM regulation

😊 first steps to launch studies to assess the scope for an update;

Including local **specific** conditions affecting air quality in cities

- Take into account the particular situation of certain areas in Europe regarding the negative contribution of **orographic** and **meteorological** conditions in the attainment of air quality **limit values**

 done

Support **local** air quality monitoring & management

- Ensure a **regular** review (every 3 years) of AQP
- Further limit **exceedance** periods and require more **proactive** AQ planning to **prevent** missing compliance deadlines
- Provide further EU **support** for drafting & implementing air quality plans, including types of measures that could be adopted, support to carry out **health impact assessment** and support a comparison between AQ plans

😊 done

😊 **but confusing** language in the proposal

Directives shows that this will increase effectiveness in bringing down air pollutant concentrations. Ozone is exempted from the limit values, which will be reviewed in 2030. The revised limit and target values will enter into force in 2030, balancing the need for swift improvement with the need to ensure sufficient lead-time and for coordination with key related policies that will bear results in 2030, such as the Fit for 55 package of climate change mitigation policies. To put the EU on a trajectory that will

hopefully immediately, while they need to be MET by 2030 !!

of assessing the feasibility of complying with strict limit values.

?

😊 seems so – and its good that applying AQ models for assessment is a must

The Commission will furthermore need increased support from the JRC to strengthen air quality monitoring and modelling implementation. Specifically, this will involve drafting guidance, chairing two key expert networks, and drawing up standards relating to air quality monitoring and modelling in collaboration with the European Committee for Standardization (CEN). This scientific support would be obtained through the launch of administrative arrangements.

Thank you

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Eurocites Position Paper on the AQ Directives' revision: **Hope is in the Air** Quality

<https://euagenda.eu/upload/publications/eurocities-policy-statement-on-air-quality-aq-directives.pdf>

Press release on the new proposal:

<https://eurocities.eu/latest/new-eu-air-quality-directive-proposed/>