



Cleaner air in our cities

EUROCITIES answer to the Commission questionnaire on the consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies

EUROCITIES

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EXECUTIVE SUMMARY

Because Europe's city leaders are fully committed to improving the health and quality of life of our citizens we place a very high priority on improving urban air quality. We support tough EU and national targets. But to be effective these must be backed by an ambitious policy framework across all levels of government - not only local and regional, but also member states and EU-wide.

The current framework penalises city authorities for not achieving limit values, when in fact many of the factors affecting air quality are outside our control. As a result, time and effort is being wasted on legal process when resources could be better deployed on practical measures to improve air quality. The current situation is not sustainable and both the European Commission and member states must do more to support cities to achieve our shared aim of a healthy environment.

In particular, Europe's cities need

- effective and more stringent emission source controls at EU level, including
 - a realistic test procedure for the Euro emission standards for cars, trucks and buses;
 - measures on tyre and brake wear, on non-road mobile machinery such as construction machines, on small combustion installations such as for heating, on retrofitting diesel vehicles and machinery and on shipping;
- a stricter National Emissions Ceilings Directive (NECD) to enable the reduction of overall air pollution to levels within the limit values of the air quality directive, especially for particulate matter (PM).

The revision of the Ambient Air Quality Directive (AAQD) should focus on human health. Reducing human exposure to air pollution is just as important as reducing overall pollutant concentrations in ambient air. In addition legislation should be simplified where possible, and above all must be fair. For example, local authorities should not be held to account for factors beyond their control, such as long-range pollution from outside their territory. Compliance measures should also recognise the efforts already made and being implemented to address air pollution.

Our full answer to the consultation, starting on the next page, is structured according to the sections of Commission questionnaire.

ENSURING COMPLIANCE WITH EU AIR QUALITY REQUIREMENTS

(Section 2 of the consultation)

Obligations under the Ambient Air Quality Directive (AAQD)

The EU, member states, regional and local authorities must work together to meet the EU standards under the Ambient Air Quality Directive (AAQD, 2008/50/EC). Instead of weakening air quality standards, the EU should

- improve the way compliance is assessed. Cities should be assessed on local emissions they control rather than transboundary pollution.
- set realistic but ambitious timelines for compliance that correlate with the results of effective emission reductions at source, such as through better Euro emission standards for road vehicles. The AAQD, National Emissions Ceilings Directive (NECD) and source-related legislation should be revised in a coherent way, including an integrated timetable for the relevant pieces of legislation with deadlines for implementation and compliance of emission control objectives and air quality standards.
- establish partnership agreements between the Commission and member states, and possibly also multi-level partnership agreements between the Commission and other relevant levels of governance, such as national, regional and local. Local authorities should be involved in the design of these agreements, and overly complicated reporting obligations should be avoided.

Pursuing infringement cases under the AAQD in the meantime for every non-attainment case will most likely not help improve local air quality, as this depends to a large extent on:

- long-range pollution, that is pollutants coming from further away;
- the real-life performance of emission reduction technologies, for example in road vehicles.

Infringement procedures are only appropriate in the event of a traceable lack of ambition of national and local strategies. We oppose any 'handing down' of fines to local authorities as the means of cities to improve air quality are limited, and also depend on national and EU action.

Extensions to meet the AAQD limits should not be systematic, as this might reduce the pressure for action in regions where attainment could be achieved within the original deadlines. General postponements might also be unfair to member state, regional and local authorities who have already pursued ambitious policies.

A solution needs to be found however for those regions where, despite ambitious measures, implementing all proportionate measures would not be sufficient within the current compliance periods to bring pollution levels below the air quality standards. In these cases, individual time extensions should be granted, as long as it can be proved that all proportionate measures have been taken and that further efforts are underway to meet the limit values within the time extension. Further general exemptions should be limited to those in the current air quality directive (winter sanding, natural sources, transboundary particulate matter (PM) transport). Winter sanding exemptions should be justified by road and pedestrian safety as well as showing that the source is not other road dust sources, such as studded tyres.

Limit values set over a longer period of time would help account for variations in meteorological conditions. Yet short-term exposure can also have health effects. We believe that both aspects could be accounted for by averaging exceedances of short-term limit values over longer periods of time. For instance, compliance with a 24 hour limit value could be assessed on the basis of the number of exceedances over three years instead of one.

Additional non-legislative measures

We agree with the Commission's suggestion to provide more governance support for air quality measures, for example through competence building programmes and guidance on increased and more effective use of existing EU funding sources.

EU funding schemes and programmes to support urban air quality initiatives, such as an 'Urban Clean Air Programme', should be a priority.

Partnership implementation agreements negotiated between the Commission and member states, and possibly also multi-level partnership agreements between the Commission and relevant national, regional/local authorities could be more helpful than infringement procedures. The agreements need to be accompanied by reporting schemes that are efficient and effective.

Focus on effective source policies

The EU should swiftly adopt more stringent emission source controls at EU level, focusing on the sectors where measures to reduce emissions will be most cost-effective in terms of improving air quality. This applies in particular to:

- road vehicles, with specific regard to emissions resulting from urban driving conditions and limiting NO₂ emissions;
- tyre and brake wear;
- non-road mobile machinery, such as construction machines;
- small combustion installations, such as for heating;
- technical specifications for and funding of Diesel Particulate Filter (DPF) retrofit in diesel vehicles and machinery, which could be helpful already in the short term, and which should address NO₂ emission reduction.

Level of ambition of the revised National Emissions Ceilings Directive

A stricter National Emissions Ceilings Directive (NECD) is necessary to reduce background concentrations. In particular, the revised NECD needs to set ceilings for particulate matter (PM) emissions, at least ceilings for the primary emissions of non-diffusive PM emissions, which can be calculated with an acceptable uncertainty margin.

A more ambitious NECD is vital to reducing air pollution to levels within the limit values of the air quality directive, especially for particulate matter.

The EU should carefully choose the target year for meeting new limit values under both the NECD and the AAQD. In particular, the target year should

- make compliance possible, notably with regards to the necessary support and effectiveness of source policies;
- be ambitious, and correspond with the time frame for implementation at local level, which can be shortened through political cycles.

MEDIUM TO LONG TERM MEASURES

(Section 3 of the consultation)

Coherence between air pollution and climate change policies (3.1)

In future we should maximise alignment between EU air quality policy and climate policy. Both air quality and climate policies should avoid negative side effects on each other, such as these current examples:

- an increasing share of diesel fuelled cars in the EU fleet, which emit less CO₂ but more climate forcing soot particles and more nitrogen oxides (NO_x), especially in the absence of effective test procedures for the Euro pollutant emission standards for road vehicles;
- Increased biomass use in heating installations, which can help reduce greenhouse gas emissions but, in the absence of sufficient pollutant emission regulation, can also lead to more air pollution.

Emissions from Combined Heat and Power (CHP) installations need to be properly managed. The Commission should investigate the need for emission standards for small combustion installations.

Climate measures should clearly avoid significant negative side effects on air quality, and therefore on public health, such as through biomass burning.

The Commission could look into ways of reinforcing specific action to address ozone precursors that are short-lived climate pollutants, such as methane.

Reducing elemental/organic carbon emissions is a likely win-win for air quality and climate change mitigation, even though further research would be helpful to confirm this. Monitoring black carbon, elemental/organic carbon or another suitable related measure should be encouraged to find new indicators for the health effects of particles that complement the mass based monitoring. Further discussions will probably be needed to exactly define the most suitable indicator. Once the indicator is clear and, if necessary, monitoring standards and emission factors have been defined, monitoring these emissions at a number of representative monitoring stations in rural, urban background and hot spot/traffic environments could be a useful first step to improve information about the relevant emission levels.

Synergies between air quality and other policy areas, such as noise, should also be explored in the future.

Strategic approach and target year of future air pollution policy (3.2)

The EU should carefully choose the main target year for achieving the goals of the new, revised EU Thematic Strategy on Air Pollution (TSAP), considering

- the necessity to maintain air quality ambitions and continue work on improvements as fast as possible; and
- the failure of vital source policies to deliver the necessary emission reductions, restricting significant progress on air quality in the near future.

Interim targets in the NECD should be considered to inform policy making before the ultimate target year, especially if the target year is later than 2025.

The overall ambition of the revised Thematic Strategy should be governed by human health considerations while taking feasibility into account. In particular, if air quality and emission ceiling targets are to be realistic, they must correlate with what revised and new source policies will deliver.

Setting Priorities (3.3)

EU air quality policy should, at least in the near future, focus on addressing human health concerns, as the most pressing challenges today mainly concern pollutants that are detrimental to human health. Problems with air pollution are also concentrated in cities, which have the highest population densities. Consequently, there should be as much focus on reducing human exposure as on reducing pollutant concentrations in ambient air.

Overall, priorities should as far as possible reflect the latest available evidence provided by the World Health Organisation.

Choice of policy instruments (3.4)

We believe that the EU should prioritise policy instruments that improve human health, in particular in cities, and that are cost-effective. The most important instruments are:

1. Legislation that reduces emissions at source rather than cleaning up afterwards. This is the most cost effective approach. In particular, our cities need
 - stricter and effective legislation on road vehicle emissions that deliver emission reductions under urban driving conditions, not only during the emission test, and which also takes account of regional variations in climatic conditions, such as higher cold start emissions in northern Europe;
 - new legislation to limit emissions from small combustion sources, such as household heating. Existing national legislation that is stricter than future EU regulation should remain valid;
 - technical specifications for and funding of effective diesel particulate matter filter retrofits in diesel road vehicles and machinery, including non-road mobile machinery, such as machines used for construction.
2. A more ambitious National Emissions Ceilings Directive, with a carefully chosen target year;
3. Non-legislative methods, in particular EU funding schemes for urban air quality programmes, research and innovation actions or awareness raising. City authorities should be able to access EU funding for urban air quality programmes directly.

Air quality limit values in the AAQD should not be weakened, but stricter values only make sense if they are realistic. In particular, any change to the limit values must correspond to the real-world delivery of improved source policies when new AAQD limit values come into effect.

In the mid-term, the EU should negotiate new emission reduction commitments for 2030 under the Gothenburg Protocol that are aligned with the ambition level determined for the revised EU air quality strategy. We agree that, to be effective, this option would require action to ensure that EU neighbouring countries join and ratify the 2020 emission reduction targets.

REVISING THE AMBIENT AIR QUALITY DIRECTIVE

(Section 4 of the consultation)

We believe that the revision should follow the following key principles:

- There should be a strong focus on human health. Reducing human exposure to air pollution is just as important as reducing overall pollutant concentrations in ambient air.
- The legislation should be simplified. Fewer, better standards would be helpful for
 - more targeted action on air quality;
 - better communication of priorities and achievements to the public.
- The legislation should be fair. The compliance process should reflect:
 - factors over which relevant authorities have no control. For instance, city authorities have no influence on long-range, transboundary pollution that comes from outside their territory;
 - the measures that have been and are being implemented to address air pollution.

Generally speaking, the WHO guideline values on pollutant concentrations are useful in providing orientation for setting long-term air quality objectives. However, the WHO values do not take into account feasibility and proportionality of air quality measures, and can therefore not be incorporated exactly into EU limit values.

Aligning with latest scientific and technical knowledge (particulate matter) (4.1a)

Concerning the different pollutants regulated, particulate matter (PM) reductions should be the priority. In contrast to ozone, high PM concentrations mostly correspond with high population density. In anticipation of the final results of the World Health Organization (WHO) review on the latest scientific evidence, it can be expected that PM reduction would yield the highest human health benefits, in particular a reduction of particle emissions from combustion, such as soot.

Given the continued difficulties in meeting the PM10 limit values of the air quality directive in many member states and the significant long-range transboundary transport of PM10, it is unlikely that tighter limit values would have a significant effect on local PM10 concentrations. In order to address the human health concerns connected to PM10 exposure, it would appear more promising to focus on:

- tightening source-related legislation as soon as possible, in particular for small combustion and mobile machinery;
- more ambitious emission ceilings under the NECD and the Gothenburg protocol after 2020.

The latter would also allow for setting a PM2.5 limit value closer to WHO guidance values. National and international action on PM2.5 is most effective since a large part of PM2.5 concentrations are due to long-range transboundary pollution.

The current national exposure reduction target or a similar concept for fine particulate matter (PM2.5) should continue to be part of the air quality directive. As mentioned above, a strategy for overall fine particulate matter reduction defined at the national level is indispensable. Without it, regional/local air quality plans are not enough to meet air quality limit values at difficult hot spots and to reduce urban population exposure with a view to meeting the national exposure reduction target. Ambitious national emissions ceilings under the revised NECD will be helpful for this as well (see above).

Current knowledge about health effects of fine particles suggests no specific concentration threshold at which the particles' effects on human health change abruptly. Consequently, the current absolute pollution exposure concentration obligation for PM_{2.5} should be replaced by a percentage reduction goal.

Aligning with latest scientific and technical knowledge (black carbon) (4.1b)

Monitoring black carbon, elemental/organic carbon or other another suitable related measure should be encouraged to find new indicators for the health effects of particles that complement the mass based monitoring. Further discussions will probably be needed to exactly define the most suitable indicator. Once the indicator is clear and, if necessary, monitoring standards and emission factors have been defined, monitoring these emissions at a number of representative monitoring stations in rural, urban background and hot spot/traffic environments could be a useful first step to improve information about the relevant emission levels.

Aligning with latest scientific and technical knowledge (ozone) (4.1c)

The distance between ozone hot spots and the actual sources of ozone can be large as ozone is not directly emitted but is formed in the atmosphere through a number of reactions between other substances. Ozone precursors, including NO₂, can travel large distances.

Local action on these substances does not necessarily change local ozone levels much. Due to the complex chemistry involved, there can even be adverse effects of acting on ozone precursors: decreasing NO_x emissions from the vehicle fleet, which is necessary to meet NO₂ limit values and can help reduce ozone overall, can actually lead to higher ozone *locally*.

Accordingly, instead of mandatory ozone limit values, ozone abatement should concentrate on source-related measures covering large geographical areas, including the NECD and international agreements, in particular the Gothenburg protocol.

Ozone target values and monitoring ozone concentrations remain important to evaluate the health effects of ozone.

Management framework (4.2a)

Generally pollution concentrations, especially short-time concentrations, show strong fluctuations simply because of varying dispersion conditions, which depend largely on the weather. When short-time limit values are exceeded, such as one-hour limit values or 24-hour limit values, this is often an indication of difficult weather conditions rather than of bad air quality management. Air quality standards should account for health effects, including health effects of short pollution peaks, and should even out the influence of weather conditions. When it comes to limit values for nitrogen dioxide (NO₂), PM and ozone, we believe that averaging short-time limit values over three years may be a good way to even out the influence of weather conditions. Annual limit values could still remain.

Management framework (4.2b)

Compliance assessment of limit values should be based on monitoring supported by modelling, focusing on those areas where there is relevant human exposure.

Modelling standards should be introduced and harmonised where possible and emissions databases improved, while maintaining flexibility to reflect specific regional requirements.

Harmonised emission factors and models would help model the contribution of road resuspension⁷ to air pollution. This will become more important in the future: with technological progress on exhaust gas treatment, road vehicles' tailpipe emissions are expected to decrease, as is their share in overall emissions. Consequently, the share and relevance of non-exhaust emissions from road vehicles, such as from tyre and brake wear and road resuspension, is expected to increase.

The EU should also provide a consistent set of emission factors for the modelling of NO_x emissions from road vehicles, including the real-world emissions of Euro 6 vehicles, especially under urban driving conditions.

EU funding schemes and programmes to support urban air quality initiatives should include funding for cooperation between local and regional authorities to exchange both positive and negative experiences with air quality measures, and to define and disseminate best practice. This would be particularly helpful because quantitative information on the effectiveness of local and regional measures is currently not always available.

Management framework (4.2c)

It is mainly the role of the national emissions ceilings directive (NECD) to oblige member states to contribute to overall pollution reduction in the EU.

In principle, it can be helpful if member states with significant transboundary pollution prepare air quality plans jointly with neighbouring member states. In many cases, local and regional air quality plans alone will not be effective in addressing transboundary pollution because relevant emission sources, such as larger industries and plants, can also be located outside zones close to the border. In such cases, national measures are needed. However, these joint plans should not be mandatory. Member states, regional and local authorities should decide whether a joint air quality plan would be helpful for the specific situation of a given area or not.

The Commission should coordinate joint air quality plans between member states.

The national level should take on a stronger role in tackling (local) non-compliance with the air quality directive as many measures can only be developed and implemented effectively by national governments. The national programmes required by the NECD should specifically aim at helping to meet the standards of the air quality directive in the relevant member state.

⁷ Road resuspension means that particles on the road surface are released into the air due to vehicles passing by.

REVISING THE NATIONAL EMISSION CEILINGS DIRECTIVE (NECD)

(Section 5 of the consultation)

Aligning with latest scientific and technical knowledge (5.1)

Particulate matter (PM) reduction should be a priority. In contrast to ozone, high PM concentrations mostly correspond with high population density in cities. In anticipation of the final results of the WHO review on health effects, it can be expected that PM reduction would yield the highest health benefits, especially if they involve a reduction of particle emissions from combustion, such as soot.

Additional NO_x control could be beneficial both for abatement of (secondary) PM and ozone.

Monitoring black carbon, elemental/organic carbon or other another suitable related measure should be encouraged to find new indicators for the health effects of particles that complement mass based monitoring. Further discussions will probably be needed to exactly define the most suitable indicator. Once the indicator is clear and, if necessary, monitoring standards and emission factors have been defined, monitoring these emissions at a number of representative monitoring stations in rural, urban background and hot spot/traffic environments could be a useful first step to improve information about the relevant emission levels.

Management framework (5.2a)

Flexibility should be limited to minor adjustments of member state emission ceilings, under specific circumstances and after approval by the Commission, to avoid a weakening of the NECD. These specific or exceptional circumstances must be precisely defined to ensure predictability for member states and allow the Commission to take clear decisions.

Management framework (5.2b)

An EU legal requirement for member states and local authorities to coordinate their emission reduction measures and local air quality management could encourage more strategic planning.

The national programmes member states have to draw up to meet their national emission ceilings under the NECD must specifically aim at helping to meet the standards of the air quality directive in the member state.

However, this needs to be backed by effective EU level coordination of air quality policy, limit values and emission ceilings, in particular of the national emissions ceilings and air quality directive and source policies. For instance, the EU should synchronise the deadlines for meeting national emissions ceilings under the NECD and air quality standards under the AAQD.

General remarks on the revision of the NEC Directive

A stricter national emissions ceilings directive is necessary to reduce background concentrations and for reducing overall air pollution to levels within the limit values of the air quality directive, especially for particulate matter. The revised NECD needs to set ceilings at least for the primary emissions of non-diffusive PM emissions, which can be calculated with an acceptable uncertainty margin.

The EU should carefully choose the target year for meeting new limit values under both the NECD and the AAQD. In particular, the target year should

- make compliance possible, notably with regards to the necessary support and effectiveness of source policies;
- be early enough to correspond with the time frame for implementation at local level and to stay ambitious.

ADDRESSING MAJOR AIR POLLUTION SOURCES

(Section 6 of the consultation)

Road transport (6.1)

Additional measures to address air emissions from road transport should start with effective emission reduction at source, in particular:

- Swift introduction of the new Euro emission standard test procedure to ensure that real world emissions of Euro 6/VI vehicles, including in urban areas, are as close as possible to the type approval limit values. The test cycle should include provisions to address the driving patterns of vehicles used for particular tasks in urban areas, such as buses and refuse trucks, to ensure that pollution control technologies operate effectively under these specific urban driving conditions.
- Strengthening EU-wide requirements for in-service compliance with emissions standards, to ensure that vehicles on European roads continue to produce low emissions over their lifetime.
- Exploring ways of limiting NO₂ emissions from Euro 6/VI and older vehicles, in particular diesel vehicles, without compromising other emissions such as PM.
- Development of new, more stringent Euro standards to enter into force in 2020. In particular, the new standards (Euro 7/VII) must reduce NO₂ emissions specifically, not only NO_x emissions.

A supplementary non-mandatory emission standard that is stricter than the Euro standards could help member states design incentives for cleaner vehicles. However, making the harmonised use of such a standard mandatory for national and local governments would not be helpful, as it could prevent authorities from accounting for specific local air quality situations.

Standards for retrofitting existing vehicles with filters and other emission reduction technologies would be particularly useful for commercial vehicles, including trucks, buses and vans, as these vehicles remain in use much longer than passenger cars.

Road charging schemes for heavy duty vehicles that incorporate air pollutant emissions can be helpful. However, harmonisation of (city) access restriction schemes in general at EU level or imposition of common minimum thresholds for access restriction schemes would be counterproductive as there is no 'one-size-fits-all' solution, and environmental conditions or traffic patterns vary across the EU and within member states. Developing access restriction schemes is a local competence that is best addressed when local authorities are given the flexibility to respond with appropriate solutions.

Additional general remarks on the regulation of road transport emissions

Differentiated non-mandatory standards for road vehicles, such as the current standard for Enhanced Environmentally Friendly Vehicles (EEV)², could be useful for cities and other public authorities to define criteria for public procurement. However, this measure would only concern a small part of the vehicle fleet on the road and can only complement the priority to make binding Euro emission standards more effective. In general, access restrictions should be based on Euro standards.

Technical specifications for retrofitting would be helpful to

- generally facilitate emission reduction at source;
- allow for quicker introduction of stricter low emission zone (LEZ) access criteria where necessary, since vehicle users would be able to retrofit their vehicles instead of having to replace them to meet the new criteria.

When addressing road transport, the overall EU strategy on air quality should also clearly support a modal shift towards more sustainable transport modes and solutions in urban areas, such as cycling, walking and public transport. Modal shift is vital to complement transport emission reductions through vehicle technology and other measures. It also has important positive side-effects, such as reducing congestion and freeing public space in urban areas. The EU and member states should support modal shift, including through financial support for local action.

Off-road transport and non-road machinery (6.2)

Non-road mobile machinery (NRMM) can significantly contribute to air pollution in cities. When a new emission standard is already in place exemptions currently granted to manufacturers for bringing older, more polluting machines into the market should be limited.

In addition, we support the following suggestions by the Commission (in order of importance):

1. Extend the scope of application of current Stage IV NRMM standards to additional power classes and applications, including stationary applications.
2. Ensure that approval emission tests reflect the machinery's emissions in real world circumstances.
3. Ensure that there are incentives for retrofitting and/or replacing older inland waterway vessels' engines by newer and cleaner ones.
4. 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 notably reduce PM emissions.

² Used for heavy duty vehicles

Agricultural sector (6.3)

We support the following suggestions by the Commission (in order of importance):

1. 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.
2. 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.
3. Introduce measures to ban or restrict the burning of agricultural waste.
4. Promote good practices in manure management and manure spreading in member states through support from the Rural Development Fund.

In addition, granting subsidies to European farmers should generally depend on following good agricultural practice, such as low emission manure management. The EU should tighten emission limit values in the Industrial Emissions Directive (IED) for food related installations.

Small/medium combustion sector (6.4)

We support the following options for additional measures to address air emissions from small and medium combustion installations (below 50 MW)

- Develop a supplementary and more stringent standard for installations below the Ecodesign capacity threshold for use in national and local measures such as fiscal incentives to be applied in zones that are in non-compliance with air quality limits
- Regulate combustion installations above the Ecodesign capacity threshold but below the 50MW threshold set in the Industrial Emissions Directive (IED), with EU-wide emission limit values and a somewhat simpler, 'light' permitting regime than under the 'full' permitting procedure of the IPPC Directive³.

These measures should be taken swiftly.

General remarks on regulation of emissions from the small/medium combustion sector:

- Air quality should receive priority over climate change mitigation where measures such as biomass burning risk harming public health. Consequently, the EU should adopt stringent emission limit values for small combustion appliances to restrict the negative health impact of enhanced use of biomass fuel as much as possible. This should include a standardised test procedure.
- Existing national or regional/ local regulation that is stricter than the future EU approach should remain valid.

Shipping sector (6.5)

We support the following options for additional measures to address air emissions from the shipping sector:

- Promote the extension of the Sulphur Emission Control Areas to additional EU sea areas such as the Irish Sea, the Bay of Biscay, the Mediterranean and/or the Black Sea provided that such a measure is cost-effective.

³ Directive 2008/1/EC on Integrated Pollution Prevention and Control

- Promote the designation of NO_x Emission Control Areas in EU regional seas where cost-effective (those listed above and/or the Baltic and the North Sea including the English Channel) provided that such a measure is cost-effective.
- Introduce requirements for PM emission controls in EU regional seas where cost-effective.
- Reduce air pollution and greenhouse gas emissions from ships in EU waters by setting speed restrictions.
- Aim for a reduction of total NO_x emissions from shipping by retrofitting all vessels with NO_x abatement equipment.

Existing inland waterway vessels should be retrofitted with particle filters. This is technically feasible and cost-effective with regard to protection of human health and climate. EU funding should support national/regional retrofit programmes of such vessels.

The EU should also explore additional options, such as using biogas or natural gas in ships, and carefully assess their impact on air quality, climate change and overall sustainability.

General remarks on regulation of emissions from the shipping sector

When it comes to sea traffic, the EU should focus on

- policies to limit emissions at their source
- measures to protect (densely populated) coastal areas.