EUROCITIES statement on the revision of the National Emissions Ceilings (NEC) Directive

Working together for clean air

European cities are fully committed to improving air quality, as it is very important for the health and quality of life of our citizens. We constantly take local action to promote cleaner air, such as encouraging walking and cycling, improving public transport, using cleaner vehicles in public fleets, improving traffic management and restricting access for the most polluting vehicles.

Yet many factors affecting air pollution are outside of our control, and many city authorities are struggling to meet the local air quality requirements of the Ambient Air Quality Directive (2008/50/EC). More ambitious national and European policies are needed to make real progress. The proposed revision of the National Emissions Ceilings (NEC) Directive (COM (2013) 920) can facilitate this as the EU instrument to guide member states efforts on air pollution.

The Commission proposal should be strengthened to reduce background concentrations of pollution and to reduce overall air pollution to levels that are within the limit values of the Ambient Air Quality Directive, especially for particulate matter (PM).

We recommend

Binding national emission ceilings for 2025

The emission ceilings proposed for 2020, which reflect the revised international Gothenburg protocol[1], will be achieved without the need for any additional national measures, beyond those emanating from existing legislation.

Any real progress will therefore depend on the next step of legally binding national emission ceilings.

We believe these should already apply in 2025, instead of 2030, if we are to make meaningful progress that could help improve urban air quality. Article 4 and Annex II

[1] http://www.unece.org/?29858

should be revised and clearly set out the targets[2]. The Commission's own impact assessment concludes that binding ceilings in 2025 can be achieved cost-effectively[3]. We believe that 2030 is too late to make an effective link between national emission control strategies under the NEC Directive and local air quality planning, including under the Ambient Air Quality Directive. It would counteract the goal of better coordinating national and local air quality measures.

More ambitious, more cost-effective targets

Binding reduction targets for 2025 should be based on what the impact assessment has identified as "the option which delivers the maximum net benefit"[4]. In particular, emission reductions for particulate matter ($PM_{2.5}$), nitrogen oxides (NO_x), and ammonia (NH_3) must be much closer to the levels suggested in the impact assessment, which are

- a 49% reduction in $PM_{2.5}$, compared to 37% in the Commission proposal
- a 64% reduction in NO_x, compared to 56% in the Commission proposal
- a 30% reduction in NH_3, compared to 17% in the Commission proposal[5]

We support

The following elements of the Commission proposal can help achieve better air quality, including in cities, and should be maintained:

- national air pollution control programmes (Article 6)
  - ensuring that the national programmes contribute to local and regional air quality plans under the Air Quality Directive
  - Commission support for exchange of good practice
  - prioritising emission reduction measures for black carbon when reducing particulate matter ($PM_{2.5}$) emissions
  - consulting relevant local and regional authorities when drafting national air pollution control programmes
- cost effective measures to reduce ammonia (NH_3) emissions from agriculture (Annex III)

Why the NEC Directive matters for cities

Transboundary pollution is a recognised problem across Europe and national policies have a large influence on air quality:

- taxation policy can incentivise cleaner, rather than 'dirtier', fuels and technologies for road vehicles and heating installations

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[2] For 2025, Article 4 implies that reductions should be halfway between the 2020 and 2030 targets but does not make them completely binding.

[3] "Setting air pollution reduction objectives for 2025 rather than only for 2030 would not cause economic inefficiency or incoherence with climate and energy policy, and would deliver additional cost-effective emission reductions in the period 2025-2030." SWD(2013)531, http://bit.ly/1ggGN3f, p. 70

[4] SWD(2013)531, http://bit.ly/1ggGN3f, p. 70

[5] Emission reductions compared to 2005 levels; see SWD(2013)531, http://bit.ly/1ggGN3f, p. 50, table 13, scenario 6c

- national transport policy affects how we travel medium and long distances, and how goods are delivered to us
- national energy policy can provide for less polluting electricity and heat production.

All of these impact on the overall level of air pollution, as well as on the air we breathe in our cities.

Other areas where national action is necessary include:

- ammonia (NH3) emissions from agriculture, which are precursors for secondary particle formation
- coal and wood burning for residential heating, which emits high amounts of particulate matter and sulphur. This contributes to elevated particulate matter (PM) background concentrations that are a major obstacle to full compliance with current standards of the Ambient Air Quality Directive

Conclusions

The NEC Directive can guide national policies to reduce overall air pollution in the EU. Its revision is essential to achieving local air quality within the limit values of the air quality directive, especially for particulate matter.

Achieving cleaner air in our cities requires action from all relevant actors and levels of government. Cities will continue to take action locally. An ambitious revision of the NEC Directive should guide national measures. At EU level, good emission standards and measures are vital. In particular, we need the revision of Euro emission standard testing procedures for cars, trucks and buses to reduce emissions under urban driving conditions.

Background: Additional action needed at EU level

National and local action can only be effective if the EU also takes the necessary measures. Some of the most effective and cost-proportionate actions are those that can be adopted at European level, in particular when it comes to:

- **Euro 6/VI emission standards for cars, trucks and buses:** good emission standards and measures are central to delivering wider reductions in air pollution across Europe. Euro 4/IV and 5/V standard vehicles are much more polluting under real world driving conditions, in particular in cities, than during the unrealistic current test procedures. This has delayed air quality improvements and placed an additional burden on local authorities. The revision of Euro emission standard testing procedures must reduce emissions under urban driving conditions.
- **Accelerating adoption of Euro 6/VI and other ultra low emission vehicles:** the EU should encourage an early and accelerated uptake of Euro 6/VI and ultra low emission vehicles. Cities that want to introduce Ultra Low Emission Zones should receive EU support, including funding.
- **Aligning climate and air quality policies:** in the past**,** climate and energy policies have not taken air quality sufficiently into account. In particular, the increased market share of diesel vehicles has helped reduce CO_2 emissions but worsened air quality. The EU should take a unified approach for CO_2 and pollutant emissions, in particular from road vehicles running on petrol and diesel. Future energy policy to support climate objectives must not lead to more air pollution, for instance through increased biomass use. The proposed medium combustion plant directive should address this.