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Public consultation on "air quality - revision of EU rules"

Fields marked with * are mandatory.

Introduction

Background

Clean air is essential for our health and that of the environment. To this end, the EU – via the <u>Ambient Air Quality Directives</u>
(https://ec.europa.eu/environment/air/quality/existing_leg.htm) - sets air quality standards to avoid the build-up of excessive air pollutant concentrations (see an overview of the <u>EU air quality standards (https://ec.europa.eu/environment/air/quality/standards.htm)</u> below).

These Directives also define common methods to monitor, assess and inform on ambient air quality in the European Union. Furthermore, they require action, when standards are exceeded, in order to avoid, prevent or reduce harmful effects on human health and the environment as a whole.

As part of the <u>European Green Deal</u> (https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en) and its <u>Zero Pollution Action Plan</u> (https://ec.europa.eu/environment/strategy/zero-pollution-action-plan_en), the EU is revising these EU air quality standards, to align them more closely with the recommendations of the World Health Organization. Note that the World Health Organization publishes and updates <u>Air Quality Guidelines</u> (https://apps.who.int/iris/handle/10665/345334), most recently in 2021: these updated Air Quality Guidelines are considered in the ongoing revision of EU rules.

This revision also aims to improve overall EU legislation for clean air, including provisions on penalties in case of exceedances or requirements for public information, as well as propose means to strengthen air quality monitoring, modelling and plans to help local authorities achieve cleaner air.

Pollutant	Concentration	Averaging period	Permitted exceedances each year
Fine particulate matter (PM _{2.5})	25 μg/m3	1 year	n/a
Particulate matter (PM ₁₀)	50 μg/m3	24 hours	35
	40 µg/m3	1 year	n/a
Sulphur dioxide (SO ₂)	350 μg/m3	1 hour	24
	125 µg/m3	24 hours	3
Nitrogen dioxide (NO ₂)	200 μg/m3	1 hour	18
	40 µg/m3	1 year	n/a
Lead (Pb)	0.5 µg/m3	1 year	n/a
Carbon monoxide (CO)	10 mg/m3	Max. daily 8 hour mean	n/a
Benzene (C ₆ H ₆)	5 μg/m3	1 year	n/a
Ground-level ozone (O3)	120 µg/m3	Max. daily 8 hour mean	25 averaged over 3 years
Arsenic (As)	6 ng/m3	1 year	n/a
Cadmium (Cd)	5 ng/m3	1 year	n/a
Nickel (Ni)	20 ng/m3	1 year	n/a
Polycyclic Aromatic Hydrocarbons (expressed as Benzo(a)pyrene)	1 ng/m3	1 year	n/a

Table 1: EU air quality standards (Pollutant; Concentration; Averaging period; Permitted exceedances each year)

Why are we consulting you?

The Commission has launched an <u>impact assessment (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12677-Air-quality-revision-of-EU-rules_en)</u> to support the Ambient Air Quality Directives revision.

In line with the Commission's <u>Better Regulation (https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en)</u> agenda, this public consultation questionnaire will inform the revision process, and the views collected will be considered in the impact assessment, especially when designing potential (regulatory and non-regulatory) measures to reduce air pollution, strengthen air quality monitoring, modelling and plans, and

reduce the related impacts on environment and society.

All citizens and organisations are welcome to contribute to this consultation. Contributions are particularly sought from national / regional / local authorities in the Member States, enforcement bodies, business and trade organisations' representatives and civil society organisations, academia, medical professionals, patient organisations, relevant international organisations, and the general public.

Guidance on the questionnaire

This survey is divided into the following parts:

- Part 1: About you questions about yourself and why you are answering this questionnaire.
- Part 2: General questions section on your views on air quality issues. This section does not require technical or expert knowledge of the Directives, and anyone can answer.
- Part 3: Specialised questions section on your views on air quality measures and their impacts. This section focuses on more technical aspects of the topics/measures considered by the Directives' revision and may therefore require expert knowledge to answer. This section can be skipped, if preferred.
- Part 4: Concluding questions & remarks share your thoughts on topics not covered by the questions and provide further information. This section invites you provide any additional comments or elaborate on relevant issues that have not been addressed by the questions.

We estimate that replying to all questions would take about 15 to 30 minutes. Please note that not all questions in the questionnaire need to be answered. In addition, all 'mandatory' questions include an "I do not know/not relevant" or "No opinion" option that you can use when you do not know the answer or do not have an opinion.

You are invited to respond to the best of your abilities or knowledge of the topic. Please use open fields only if there is information to be added that is strictly relevant to the related question.

The results of the questionnaire and a stand-alone summary of the results of the consultation will be produced (to be published https://ec.europa.eu/environment/air/quality/revision_of_the_aaq_directives.htm)). The analysis of the responses will be included in the impact assessment supporting the revision of the Ambient Air Quality Directives. Please take note of the specific privacy statement for this consultation which explains how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the <u>register of interest representatives</u> (https://ec.europa.eu/transparencyregister/public/homePage.do) if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your organisation's contribution will be treated and published together with those received from individuals.

Your voice matters and we are grateful to you for taking the time to complete this consultation.

About you

*Language of my contribution

Slovenian

*I am giving my contribution as

Non-governmental organisation (NGO)

*First name

*Surname

info

Focus

*Email (this won't be published)

info@focus.si

*Country of origin

Please add your country of origin, or that of your organisation.

Slovenia *Organisation name

255 character(s) maximum

Focus Association for Sustainable Development

*Organisation size

Small (10 to 49 employees)* Sc	ope	
	National	
		Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register (http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en). It's a voluntary database for organisations seeking to influence EU decision-making.

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*Please indicate the sector(s) you are active in

between 1 and 3 choices

between 1 and 3 answered rows

- air quality management
- air quality monitoring
- agriculture / food
- biodiversity and/or environment
- energy
- government
- health care
- investment and finance
- manufacturing
- public health
- raw materials extraction / primary processing
- scientific research
- transport
- none of the above sectors
- other
- I do not know, or I do not want to answer

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution	publication	privacy	settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions (https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement)

Part 2: General questions section

1.	How	importan	t is	having	good	air	quality	/ to	you?
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- Very important
- Important
- Of minor importance
- Not important at all
- No opinion

2. How concerned are you about the levels of air pollution to which you are usually exposed?

- Very concerned
- Concerned
- Slightly concerned
- Not concerned at all
- No opinion

3. Are you concerned about the following impacts that air pollution may have in your local area?

	Not at all	To some extent	To a large extent	Fully	No opinion
Impacts on health of the general population	0	0	0	•	0
Impacts on my health or the health of my family members	0	0	0	•	0
Impacts on health of vulnerable groups (including children, elderly, people with pre-existing health conditions)	0	0	0		
Impacts on businesses and small/medium enterprises (including lost work days due to air pollution)	0	0		0	
Impacts on agriculture and crops (including on plant growth and animal health)	0	0	0		
Impacts on natural environment (including pollution of water bodies, or reduced biodiversity)	0	0	0		
Impacts on buildings and infrastructure (including corrosion or discoloration of buildings)	0			0	

4. Which air pollutants are you concerned about?

- Fine particulate matter (PM2,5)
- Particulate matter (PM10)
- Sulphur dioxide (SO2)
- ✓ Nitrogen dioxide (NO2)

✓	Ground-level ozone (O3)
✓	Carbon monoxide (CO)
✓	Benzene (C6H6)
	Polycyclic aromatic hydrocarbons (including benzo(a)pyrene)
	Arsenic (As)
	Cadmium (Cd)
	Mercury (Hg)
	Nickel (Ni)
	Lead (Pb)
✓	Ultra-fine particles
✓	Black carbon and/or elemental carbon
✓	Ammonia (NH3)
✓	Methane (CH4)
	Non-methane volatile organic compounds (i.e. organic compounds capable of producing photochemical oxidants by reaction with nitrogen oxides in the
	presence of sunlight)
	None
	No opinion
	Other
5. Wo	ould you like to see more action to improve air quality? And if so, to what extent?
	Yes, a significant increase in action and ambition to tackle air pollution
	Yes, a moderate increase in action and ambition to tackle air pollution
	Yes, a small increase in action and ambition to tackle air pollution
	No, current action and ambition to tackle air pollution issues is adequate
	No opinion

6. At what level should further action be taken?

Please rank the following from 1 – where most action needs to be taken to 5 – where least action needs to be taken

	1	2	3	4	5
International					
European					

National	0		
Regional			
Local / city			

7. To what extent would you be willing to change your own way of living to contribute to improving air quality in your country / region / city?

	Not at all	To some extent	To a large extent	Fully	I do not know	N/A
Driving less by car, including in cities	0	0	0	•	0	0
Driving smaller or fuel- efficient cars	0	0	0	•	0	0
Using more public transport, walking, cycling	0	0	0	•	0	0
Changing my habits in residential heating	0	0	•	0	0	0
Investing in sustainable heating systems	0	0	0	•	0	0
Improving the energy efficiency of my home	0	0	•	0	0	0
Making conscious consumption choices to reduce emissions	0		0	0	0	0
Other	0	0	0	0	0	0

Policy area 1: Closer alignment of the EU air quality standards with scientific knowledge including the latest recommendations of the World Health Organization (WHO).

The Ambient Air Quality Directives set air quality standards for 13 air pollutants. For several air pollutants, these standards are not as stringent as recommended by the World Health Organization via their 'Air Quality Guidelines' (which themselves have recently been updated), in particular for the most harmful fine particulate matter (PM2.5). This revision of EU rules will consider and assess different policy options and scenarios to more closely align EU air quality standards with the latest scientific evidence.

Do you think that EU air quality standards (https://ec.europa.eu/environment/air/quality/standards.htm) should be made more stringent to bring
nem in line with the updated World Health Organization Air Quality Guidelines and latest scientific evidence?
Yes – EU air quality standards should be made more stringent, fully aligned with the latest WHO recommendations
Partly – EU air quality standards should be made more stringent, but only partially aligned with the latest WHO recommendations
No – current air quality standards are sufficient
No opinion
. Where (at which locations) should EU air quality standards apply?
 Everywhere, including at locations to which members of the public do not have access, including industrial installations or motorways
At all locations where there is fixed habitation or there are commercial facilities, as well as at all locations to which members of the public have access
(including, for example, roads and sidewalks)
At all locations where there is fixed habitation or there are commercial facilities
Only at locations that are representative of the exposure to air pollutants of the general population
O No opinion
0. How quickly should any revised EU air quality standards be achieved?
 As soon as possible
By 2025 at the latest
By 2030 at the latest
By 2040 at the latest
By 2050 at the latest
O No opinion
1. Do you have any other comments regarding the consideration to amend the EU's air quality standards (this could capture existing achievement o
r options to amend the standards, and the feasibility or impacts of such options)?
800 character(s) maximum

The revision must include full alignment with the revised WHO air quality guidelines for protection of health. Air quality standards in the form of binding limit values have been and will continue to be a key driver for reducing air pollution concentrations. The urgency to reduce health and environmental damage due to air pollution means that the revision must set a very ambitious timeline for achieving the new air quality standards. The AAQD should also commit to zero pollution ambition (i.e. no health risks), going beyond WHO. A process for automatic adjustment of AQ standards considering technical progress and new scientific evidence should be part of the revised AAQD

Policy area 2: improving the current air quality legislative framework (including aspects such as penalties and public information).

There have been substantial delays in taking appropriate and effective measures to meet all EU air quality standards throughout Member States. Improvements to the legislative framework, including related to access to justice in case of persistent exceedance, as well as to public information, may facilitate further air quality action. This revision of EU rules will consider and assess different policy options for amended provisions on sanctions and penalties to be established in national systems for non-fulfilment of relevant obligations deriving from the Directives. It will also consider options for a stronger harmonisation of public information.

2. Do you believe that the current provisions on penalties in the Ambient Air Quality Directives are sufficient for Member States to comply with EL
ir quality standards?
○ Yes
Partly
No
No opinion
 3. Do you believe that the Ambient Air Quality Directives should facilitate access to justice, including compensation for health damages due to air ollution (suffered by groups and/or individuals)? Yes – both stronger facilitation of access to justice in general, as well as of compensation for health damages due to air pollution in particular Partly – stronger facilitation of access to justice related to air pollution Partly – compensation for health damages due to air pollution No No opinion

Very well informed

14. How well informed do you feel about air quality in your country / region / city?

	Well informed
	Somewhat informed
	Little informed
	Not informed at all
	No opinion
5. W	which of the following types of information would you want to have easier access to? (Multiple answers possible)
✓	(Real-time) air quality data / Up-to-date average concentrations
✓	Annual reports specifically targeted to the general public
✓	Air pollution forecasts
✓	Air quality plans and measures the authorities are taking to improve air quality
✓	Air quality monitoring networks (e.g. location of monitoring stations, pollutants monitored, etc.)
✓	Information on whether air quality standards are respected
/	Air quality benchmarks that allow comparison with other cities/regions
✓	Access to downloadable historical data sets
/	Information on specific precautions and preventative actions
/	General information on short term & long term health risks of air pollution
✓	Alert/ targeted messaging during high pollution events
/	Information on citizens' rights and possible actions if air quality standards are not respected
	Other

16. Are there any other elements related to the legislative framework of the Ambient Air Quality Directives (i.e. around defining the types of air quality standards and actions exceedances trigger, governance and enforcement of actions at MS level, and around information provided to the public) that you would consider effective in facilitating the achievement of its objectives?

800 character(s) maximum

1

Binding limit values are key for reducing air pollution and improving air quality. Other types of rules should only be complements to binding limit values. 2021 WHO guideline aligned air quality standards are key to reduce air pollution to the minimum, in line with the Zero Pollution ambition

Policy area 3: strengthening of air quality monitoring, modelling and plans.

The Ambient Air Quality Directives have guided the establishment of a robust system for air quality assessment and have framed competent authorities' action to achieve cleaner air via air quality plans (i.e. the action taken when and where exceedances occur). However, the criteria on air quality monitoring and modelling could be refined to increase the comparability of air quality data. This revision of EU rules will explore solutions to improve, simplify and increase precision and coherence of requirements with regard to air quality monitoring and modelling, and options to facilitate further the effectiveness of air quality plans.

17. Do you see a need to strengthen further the assessment of air quality? (Multiple answers possible)
Yes, we need additional monitoring everywhere, whether high pollution or low pollution levels
Yes, we need additional monitoring where pollution may be a concern
Yes, we need additional monitoring of background concentrations (i.e. average pollution levels)
Yes, we need additional monitoring at locations with pollution peaks due to industrial emissions
Yes, we need additional monitoring at locations with pollution peaks due to traffic emissions
Yes, we need to ensure detailed modelling of air quality across the EU
Yes, we need to ensure detailed modelling of air quality at locations with pollution peaks (e.g. due to traffic or industry)
Yes, we need to ensure detailed modelling and forecasting of air pollution episodes
No, we have sufficient data on air quality
■ No opinion
18. Do you see a need to improve air quality plans developed by local authorities to address exceedances of EU air quality standards? (Multiple answers possible) Yes, air quality plans need to be clearer on the specific sources and origin of air pollution Yes, air quality plans need to explain the health consequences of air pollution Yes, air quality plans need to assign responsibilities (i.e. who needs to act) Yes, air quality plans need to quantify the costs and benefits of action Yes, air quality plans need to spell out how each measure contributes to solving pollution problems Yes, air quality plans need to estimate by when action would have resolved the pollution problem Yes, air quality plans need to be followed-up by a regular assessment of their implementation No need to change air quality plans, but they need to be better implemented
answers possible) Yes, air quality plans need to be clearer on the specific sources and origin of air pollution Yes, air quality plans need to explain the health consequences of air pollution Yes, air quality plans need to assign responsibilities (i.e. who needs to act) Yes, air quality plans need to quantify the costs and benefits of action Yes, air quality plans need to spell out how each measure contributes to solving pollution problems Yes, air quality plans need to estimate by when action would have resolved the pollution problem Yes, air quality plans need to be followed-up by a regular assessment of their implementation No need to change air quality plans

19. Do you have any comments regarding the improvements of monitoring, modelling and the content of air quality plans (e.g. existing effectiveness, options to improve these elements, and the feasibility or impacts of such options)?

800 character(s) maximum

Increase the minimum number of PM2.5 stations. Require monitoring stations for ultra-fine particles, black carbon, and ammonia. Ensure continuity of measurements for all pollutants. Strengthen the siting criteria and establish a system to assess the functioning of the stations. Provide clearer requirements for the network design and site locations. Require a more regular use of models and indicative measurements to support information from fixed sampling points. Strengthen and clarify the requirements in Annex XV regarding minimum content of air quality plans and provide a comprehensive and up-to-date checklist of air pollution abatement measures. Set out clearer requirements for air quality plans, incl. timeframes, public participation, and information on technical assessment and forecast

Part 3: Specialised questions section

- *20. Please indicate if you would like to answer this more specialised questions section on your views on air quality measures and their impacts. This section focuses on more technical aspects of the topics/measures considered by the Directives' revision
 - Yes, I would like to reply to this section with more specialised questions (to Part 3)
 - No, I would like to skip ahead to the final section of this questionnaire (to Part 4)
- 21. How important are the following options for policy area 1* to improve the effectiveness of the Ambient Air Quality Directives?

*Closer alignment of the EU air quality standards with scientific knowledge including the latest recommendations of the World Health Organization (WHO).

		•		_	` ,
	Of high importance	Of medium importance	Of low importance	Not at all important	No opinion
a) Ensure achievement of existing EU air quality standards		0	0	0	0
b) Align EU air quality standards with World Health Organization recommendations		0	0	0	0

c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	0		0	0	
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)		0	0	0	0
e) Establish legally enforceable limit values for all air pollutants	•	0	0	0	0
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)	0	0	0		

Please explain your answer, if you wish

100 character(s) maximum

	100 character(s) maximum
a) Ensure achievement of existing EU air quality standards	Already long overdue. A must for minimum protection of health & environment
b) Align EU air quality standards with World Health Organization recommendations	EU standards must follow best available scientific knowledge and advice
c) Mandate that all air quality standards are met in general (i.e. based on	Useful but average exposure only an addition to binding limit values
the average exposure of the general population)	everywhere.
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)	Ensure that every citizen has the right to clean air
e) Establish legally enforceable limit values for all air pollutants	Ensure that every citizen has the right to clean air

Organization (WHO) recommendations (i.e. as per updated WHO) Air	WHO AQG must be mandatory limit values now as soon as possible, not only long term aspirations.
Other	

22. How important are the following options for policy area 2* to improve the effectiveness of the Ambient Air Quality Directives?

* Improving the current air quality legislative framework (including aspects such as penalties and public information).

	Of high importance	Of medium importance	Of low importance	Not at all important	No opinion
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress		0	0	0	0
b) Further define the different types of air quality standards and the actions their exceedances would trigger		0			0
c) Expand requirements for action by national / regional / local authorities in case of exceedances		0		0	0
d) Establish additional provisions for air quality plans, including on who to involve in their preparation		0		0	0
e) Expand the provision on penalties related to air pollution		0		0	0

f) Add provisions for access to justice and for compensation for health damage from air pollution	0		0	0
g) Expand the requirements on the provision of information (e.g. on health impacts)	0	0	0	

Please explain your answer, if you wish

100 character(s) maximum

	100 character(s) maximum
a) Make it easier to adjust EU air quality standards to the evolving	EU standards must follow best available scientific knowledge and the new
technical and scientific progress	directive must enable this.
b) Further define the different types of air quality standards and the	Binding limit values are key, other are complements.Target/alert
actions their exceedances would trigger	exceedance must trigger actions.
c) Expand requirements for action by national / regional / local authorities	Expanded/detailed lists of actions at various levels of governance enable
in case of exceedances	improved implementation.
d) Establish additional provisions for air quality plans, including on who to	Plans coherence and content need to improve, by clear responsibilities and
involve in their preparation	wide participation early.
a) Expand the previous on populties related to air pollution	The AQD's effectiveness depend on fast and firm action (incl. penalties) to
e) Expand the provision on penalties related to air pollution	address non-compliance.
f) Add provisions for access to justice and for compensation for health	Key to improve/ensure limit value compliance, citizens involvement and air
damage from air pollution	pollution awareness.
g) Expand the requirements on the provision of information (e.g. on health	Public awareness must increase to improve compliance and promote
impacts)	"secondary" protective measures.
Other	

23. How important are the following options for policy area 3* to improve the effectiveness of the Ambient Air Quality Directives?

^{*} Strengthening of air quality monitoring, modelling and plans.

	Of high importance	Of medium importance	Of low importance	Not at all important	No opinion	
a) Establish more detailed rules on the location of sampling points		0	0	0	0	
b) Expand monitoring requirements to broader set of harmful air pollutants		0		0	0	
c) Enable enhanced use of modelling for air quality assessment		0	0	0	0	
d) Further specify minimum elements required of air quality plans (e.g. costbenefit analysis, projections, etc.)		0		0	0	

Please explain your answer, if you wish

100 character(s) maximum

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	100 character(s) maximum
a) Establish more detailed rules on the location of sampling points	Will enhance coherence, comparability, continuity, and the quality of monitoring and also compliance
b) Expand monitoring requirements to broader set of harmful air pollutants	More monitoring of NH3, UFP, BC, PN urgently needed, to include these (with limit values) in AAQD.
c) Enable enhanced use of modelling for air quality assessment	Modelling can be cost-effective means of assessing air pollution, a useful complement to monitoring.
d) Further specify minimum elements required of air quality plans (e.g. cost-benefit analysis, projections, etc.)	Will enhance coherence, comparability, continuity, and the quality of monitoring and also compliance
Other	

24. <u>How feasible</u> (i.e. technically, politically, from a cost perspective, etc.) would the following policy measures related to *policy area 1** be to implement?

*Closer alignment of the EU air quality standards with scientific knowledge including the latest recommendations of the World Health Organization (WHO).

	High feasibility	Medium feasibility	Low feasibility	Not at all feasible	No opinion
a) Ensure achievement of existing EU air quality standards	•	0		0	0
b) Align EU air quality standards with World Health Organization recommendations				0	0
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)					
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)					
e) Establish legally enforceable limit values for all air pollutants	•	0	0	0	0
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)					0

Please	explain	vour	answer,	if v	vou	wish
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100 character(s) maximur	mum
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	100 character(s) maximum

a) Ensure achievement of existing EU air quality standards	The socio-economic benefits of air pollution reductions are higher than the implementation costs.
b) Align EU air quality standards with World Health Organization recommendations	EU standards must follow best available scientific knowledge and advice and AAQD should enable this.
	·
c) Mandate that all air quality standards are met in general (i.e. based on the	Ave. expo. reduction should only be complementary to binding limit
average exposure of the general population)	values everywhere.
d) Mandate that all air quality standards are met everywhere (i.e. including at	UN Human Rights Council recognised access to a clean and healthy
'pollution hotspots' such as roadside or downwind from industry)	environment as a fundamental right.
e) Establish legally enforceable limit values for all air pollutants	Binding limit values has proven to be more effective in reducing air pollution than other standards.
f) Set aspirational long-term objectives to meet all World Health Organization	WHO AQG must be mandatory EU limit values as soon as possible, i.e.
(WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)	not only aspirational long term.
Other	

25. <u>How feasible</u> (i.e. technically, politically, from a cost perspective, etc.) would the following policy measures related to *policy area 2** be to implement?

* Improving the current air quality legislative framework (including aspects such as penalties and public information).

	High feasibility	Medium feasibility	Low feasibility	Not at all feasible	No opinion
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress		0	0	0	0
b) Further define the different types of air quality standards and the actions their exceedances would trigger				0	
c) Expand requirements for action by national / regional / local authorities in case of exceedances		0	0	0	0

EUSurvey - Survey

d) Establish additional provisions for air quality plans, including on who to involve in their preparation	0	0	0	0
e) Expand the provision on penalties related to air pollution	0	0	0	0
f) Add provisions for access to justice and for compensation for health damage from air pollution		0	0	0
g) Expand the requirements on the provision of information (e.g. on health impacts)	0	0	0	0

Please explain your answer, if you wish

100 character(s) maximum

	100 character(s) maximum
a) Make it easier to adjust EU air quality standards to the evolving	EU standards must follow best available scientific knowledge and the new
technical and scientific progress	directive must enable this.
b) Further define the different types of air quality standards and the	Binding limit values are key, other are complements.Target/alert
actions their exceedances would trigger	exceedance must trigger actions.
c) Expand requirements for action by national / regional / local authorities	Expanded/detailed lists of actions at various levels of governance enable
in case of exceedances	improved implementation
d) Establish additional provisions for air quality plans, including on who to	Plan's coherence and content need to improve, by clear responsibilities
involve in their preparation	and wide participation early
a) Expand the previous on populties related to air pollution	The AAQD's effectiveness depend on fast and firm action (incl. penalties)
e) Expand the provision on penalties related to air pollution	to address non-compliance.
f) Add provisions for access to justice and for compensation for health	Key to improve/ensure limit value compliance, citizens involvement and air
damage from air pollution	pollution awareness.

g) Expand the requirements on the provision of information (e.g. on health	Public awareness must increase to improve compliance and promote	
impacts)	"secondary" protective measures.	
Other		

26. <u>How feasible</u> (i.e. technically, politically, from a cost perspective, etc.) would the following policy measures related to *policy area 3** be to implement?

* Strengthening of air quality monitoring, modelling and plans.

	High feasibility	Medium feasibility	Low feasibility	Not at all feasible	No opinion
a) Establish more detailed rules on the location of sampling points		0	0	0	0
b) Expand monitoring requirements to broader set of harmful air pollutants			0	0	
c) Enable enhanced use of modelling for air quality assessment		0	0	0	0
d) Further specify minimum elements required of air quality plans (e.g. cost- benefit analysis, projections, etc.)				0	

Please explain your answer, if you wish

100 character(s) maximum

	100 character(s) maximum
a) Establish more detailed rules on the location of sampling points	Will enhance coherence, comparability, continuity, quality of the monitoring,
a) Establish more detailed fules on the location of sampling points	thus also compliance.
b) Expand manitaring requirements to breader set of bermful air pollutants	More monitoring of NH3, UFP, BC, PN urgently needed, to include these
b) Expand monitoring requirements to broader set of harmful air pollutants	(with limit values) in AAQD

c) Enable enhanced use of modelling for air quality assessment	Modelling can be cost-effective means of assessing air pollution, a useful	
c) Enable enhanced use of modelling for all quality assessment	complement to monitoring.	
d) Further specify minimum elements required of air quality plans (e.g.	Will enhance coherence, comparability, continuity, quality of the monitoring,	
cost-benefit analysis, projections, etc.)	thus also compliance.	
Other		

27. If you believe that some measures listed above are incoherent with EU strategies (e.g. the European Green Deal), incoherent with EU sectoral policies (e.g. on transport, energy or agriculture), or incoherent with national level policies, could you please briefly elaborate on your answer?

600 character(s) maximum

In line with the Zero Pollution Ambition, full alignment with WHO AQG must be attained as soon as possible. Therefore the air quality standards in the new EU Directive must be set as mandatory (binding) EU limit values and not as aspirational long term objectives.

Part 4: Concluding questions & remarks

28. What is your level of knowledge of the following?

	Excellent knowledge / understanding	Good knowledge / understanding	Some knowledge / understanding	Little knowledge / understanding	None
Issue of air pollution in general	0	•	0	0	0
Different pollutants and their sources	0	•	0	0	0
Areas most affected by air pollution	0	•	0	0	0
Detrimental impacts of exposure to air pollution	0	0	•	0	0

International initiatives to tackle air pollution (including World Health Organization guidelines)	0	0	0	0
European legislation to tackle air pollution (https://ec.europa.eu/envir onment/air/quality/index.ht m)	0	0	0	
Implementation of European legislation to tackle air pollution	0	0	0	0

29. If you wish to expand on any of your answers or if you wish to add comments or information on anything else, which is relevant to the Impact Assessment, please do so in the box below.

800	800 character(s) maximum								

30. If you consider there are materials / publications available online that should be considered further in relation to this Impact Assessment exercise, please feel free to describe them (title and author) in the box below and include any relevant links

800 character(s) maximum								

31. Do you have additional information that you would like to share in a concise document such as a position paper? (This is optional and will serve as additional background to better understand your position.)

Background Documents

Cuadro ES

Lentelė LT

Quadro PT

Tabel DA

Tabel ET

Tabel NL

Tabela PL

Tabela SL

Tabell SV

Tabella IT

Tabella MT

Tabelle DE

Tabelul RO

Tableau FR

Tablica HR

Tabula LV

Tabulka CS

Tabuľka SK

Taulukko Fl.

Táblázat HU

Πίνακας EL

Таблица BG

Contact

ENV-AAQD-REVISION@ec.europa.eu