



4 March 2013

CONSULTATION ON OPTIONS FOR REVISION OF THE EU THEMATIC STRATEGY ON AIR POLLUTION AND RELATED POLICIES

Industry supports the general approach of seeking cost-effective solutions to address predicted future air pollution across the fullest range of contributing sources. In the last decades, industry has significantly reduced its emissions to air, more than any other sectors. In addition, clean air technologies developed by industry have helped to reduce emissions across the whole EU economy and abroad.

As a result, emissions have fallen and are expected to decline further until 2020 and beyond (see Annex). The recently published International Institute for Applied System Analysis (IIASA) report on the Thematic Strategy on Air Pollution (TSAP)-2012 baseline points out that in the next decades there will be a further decline of industrial emissions as a consequence of progressive implementation of the recently agreed emission control legislation.

Europe is facing a severe economic crisis, which is taking its toll on industrial production, related services and jobs. It needs a dynamic long-term growth policy to put Europe back on track and create new jobs. Europe's environmental policy must be supportive of growth across all sectors of the economy, especially industry as the backbone of EU's economy.

BUSINESSEUROPE is expecting from the on-going review of EU's air quality policy a priority given to the full implementation across Europe of the existing legislation addressing all sources as well as the full recognition of past efforts and continuous commitments of industry to tackle the important task of reducing air pollution. It is important that this review does not impose a disproportionate cost on industry, leading to production cuts in Europe rather than to further innovation and investments in clean technologies.

1) The Industrial Emissions Directive is expected to achieve further cost-effective reductions

The Industrial Emissions Directive (IED), the central piece of legislation covering the overwhelming majority of industrial sites in Europe, has recently been adopted. It instigates large investments by industry whilst providing regulatory stability, which is essential to industrial sectors. This new framework has yet to be fully implemented in close coordination with industrial sectors in order to ensure it is implemented in a cost-effective way. Therefore, BUSINESSEUROPE does not see the need for new EU legal requirements targeting air emissions from industrial sources.



2) 2020 targets should be consistent with new Gothenburg protocol

Consistency between international protocols, in particular the Gothenburg Protocol, and EU air quality policy is essential to avoid unnecessary precaution with a risk of undermining EU's competitiveness. New Gothenburg ceilings have recently been set for 2020. The EU should not go beyond the Gothenburg protocol agreement when revising the National Emissions Ceilings (NEC) Directive.

The public consultation accompanying document mentions that the new Gothenburg Protocol ceilings will not be sufficient to meet the TSAP's 2020 objectives. This fails to mention that current assessments for achieving the health related targets are made using a different estimation method than used for the TSAP. Based on the same estimation method, the new Gothenburg Protocol ceilings will essentially deliver the TSAP objectives for the health based targets and acidification. Hence there is no need to include lower ceilings in the NEC Directive apart from NH₃ because of its dominant role in eutrophication.

The inclusion of flexibility mechanisms should be considered e.g. relative targets would be appropriate for all pollutants but especially those whose baseline emission inventories are most uncertain. Moreover, while keeping a long-term perspective, rolling objectives over multiannual commitment periods associated to periodic revisions established ex-ante could accommodate key uncertainties by allowing adaptation of commitments to the most reliable baseline information, and ensure consistency with the Gothenburg protocol."

Any introduction of new ceilings for fine particle matters (PM_{2.5}), when inventory data remain very questionable due to technical measurement challenges, further urges the need for flexibility.

3) Post-2020 air quality objectives

Realistic and transparent projections: the difficulty some member states are having meeting targets are often result of energy usage, economic activity and technological uptake being different from those estimated at the time of drafting policies. This illustrates the potential consequences of setting ceilings, which are very close to Maximum Technically Feasible Reductions (MTFR) and based on energy scenarios that do not accurately reflect the situation in the target year. When discussing post-2020 air quality objectives, it is essential to conduct sensitivity analyses – examining best and worst case scenarios as well as more central scenarios and to include uncertainties in expectable deliveries of already adopted policies as well as in effects assumptions, e.g. the assumption of human health impacts depending on the chemical and physical characteristics of particulates.

Inter-relationship between climate and air quality policy: It is important to recognize that not all GHG mitigation measures lead at the same time to air quality improvement, as it is for example the case for improved energy efficiency in combustion (e.g. high flame temperatures producing more NO_x), biomass burning, energy' use in end-of-pipe emission abatement technology. Inter relations should be appropriately considered to



ensure consistency of climate and air quality policies, and, in case the latter imply emissions limits, to set such limits at realistic levels.

4) Small combustion plants

Any new EU-wide requirements that would be put in place for small combustion plants need to be proportionate and cost-effective.

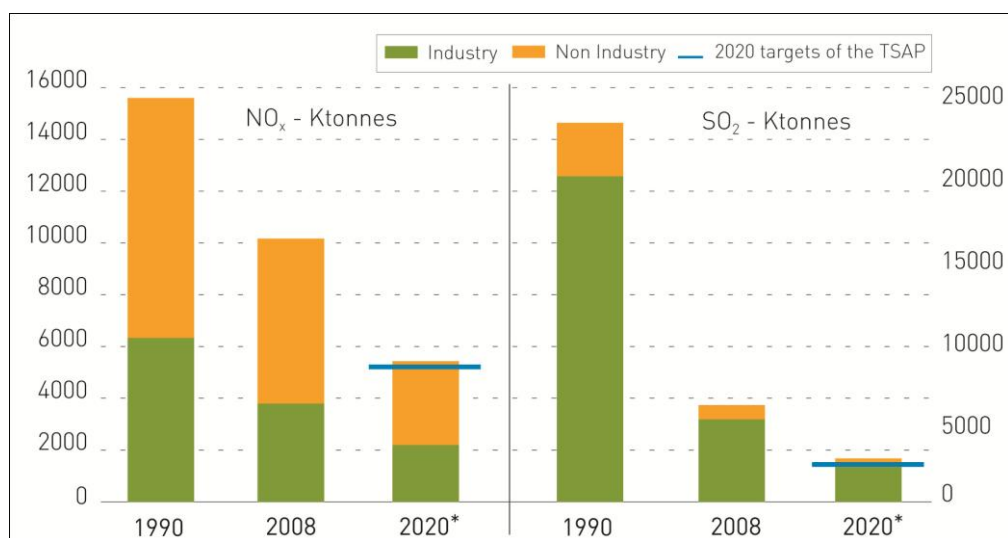
Small combustion plants are used amongst others in district heating, commercial, institutional and residential activities, agriculture, forestry and fishing as well as in some industrial sectors.

An important weighting factor is the emissions from small residential installations which are responsible for more than 30% of the total particle matters emissions of stationary combustion. In some Member States this may even be more.

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Annex: Trends in NO_x and SO₂ EU emissions and 2020 emission reduction targets of the Thematic Strategy on Air Pollution at the time of its publication.



Source: EEA, IIASA, 2010

** 2020 forecasts calculated by IIASA*