

August 2017

Danish Environment Technology Associations position on the roadmap of the Fitness Check of Ambient Air Quality Directives.

DETA welcomes the European Commission's initiative to undertake a Fitness Check of the EU Ambient Air Quality Directives. DETA agrees that it is urgent to assess the relevance, coherence, and effectiveness in addressing today's most pressing air pollutants and setting new strong air quality standards to protect human health and ecosystems, in accordance with the evolving scientific understanding and the WHO-guidelines.

DETA's overall position is:

- 1) The AAQD should be revised so target values correspond with the WHO guidelines.
- 2) The measurement of exceedances should to a larger extent take in to account the pollution "peak hours" where the exposure of air pollutants is most harmful for EU citizens as a supplement to day and year average values.
- 3) The refit-evaluation should evaluate whether new pollutants should be addressed by the AAQ Directive. Ultra-fine particles should as a minimum be covered as recommended by the WHO-guidelines.
- 4) The Fitness Check should analyze the cost-effective technology solutions to meet the threshold values in the existing AAQD and possible new threshold values in a revised directive.
- 5) A possible revision should establish a new mechanism and format for the member states obligations to establish national air-quality plans covering the national, regional, and local levels and setting up timelines and concrete initiatives.

Specific comments to the roadmap

Section A.1: Purpose

It should be included that the overall purpose is to secure clean air in Europe for all European citizens both for the fitness check and in the directives in question.

Section A.2: Justification

The evaluation should take in to account latest relevant knowledge on the socioeconomic, health and environmental cost for EU-societies due to air-pollution and find better ways to present these data to decision makers at national, regional, and local level.

Section C.1: Topics Covered

It would be beneficial if the fitness check identified why the threshold values in the AAQ Directives are not met by the specific member states.



The fitness check should include a barometer/score list in relation to the questions starting with: “to what extent” making challenges clear for decision-makers.