

Air quality - revision of EU rules – EuroHealthNet response

Attachment to include: [Policy Précis – Air Pollution and Health](#)

EuroHealthNet is a non-profit European partnership with a long-term commitment to promoting health equity in sustainable development, supporting measures to reduce pollution levels and improve health and wellbeing.

While the revised Directive outlines opportunities for the EU and Member States, gaps for a stronger response to pollution remain, including greater attention to the social inequalities entwined with health impacts.

WHO guidelines

EuroHealthNet is disappointed to note that the revised Directive does not call for full alignment with the WHO guidelines on air pollution. Air pollution is one of the biggest threats to our health and action taken must reflect the urgency. For complete alignment, Member States need support at the local level e.g. by allocating EU funds and implementing programmes to build capacity in more integrated and multisectoral approaches. The long-term benefits of full alignment will be seen not only in public health, but also in associated costs e.g. by preventing increased hospital admissions and additional health expenditures, loss of working days, and limitations to daily life activities.

Vulnerable groups

EuroHealthNet welcomes the inclusion of vulnerable groups into the revised Directive. The impacts of air pollution are not evenly spread, as higher levels of pollution can be found in more socioeconomically disadvantaged areas. Further, children and people living in disadvantaged conditions are at elevated risk to the effects of air pollution due to underlying or associated physical or mental illness, or increased exposure, and have limited resources to avoid air pollution, or manage resulting health problems. Targeted and adapted actions must be implemented along a social gradient that considers groups in greater need for support as well as the general population.

Legally binding measures

We noted that reference to the legally binding requirements has been removed in the new proposal, whereas the original 2008/50 Directive stated “*with a view to establishing a legally binding national exposure reduction obligation in order to replace the national exposure reduction target and to review the exposure concentration obligation laid down in Article 15.*”

In [our response](#) to the previous public consultation, EuroHealthNet called for EU legally binding standards and legislative frameworks to encourage greater ambition from Member States. The EU minimum requirements should consider the different aspects influencing Member States’ ability to act, and establish an ambitious but manageable base lines to meet the EU objectives by 2050 and to meet the WHO guidelines sooner. The European Commission must maintain legally binding obligations and assure its implementation.

Information exchange

Addressing air pollution requires collaboration between the EU, Member States and other international bodies. There should be a stronger role for the new European Climate, Environment and Health Observatory. The Directive’s requirement for Member States and the Commission to exchange information on air quality is welcomed by EuroHealthNet. It is important to ensure that this exchange of information also promotes a systemic application of health impact assessments of



air pollution, which consider the different elements of inequity present. This will serve to increase awareness around the social and environmental inequalities in health.

Conclusion

EuroHealthNet works with our members to build capacity of national public health authorities. To act on air pollution and address its consequences on health and wellbeing, policymakers need improved access to the evidence of these impacts. EuroHealthNet is proud to be part of the consortium for BEST-COST, a Horizon EU funded project on measuring the socioeconomic cost of environmental stressors such as air pollution in Europe. The results from this project will feed into improving policies to reduce the burden of disease caused by pollution at EU and national levels.