

EPHA – ERS Response to Consultation – European Vehicle Emissions Standards – Euro 7 for Cars, Vans, Lorries and Buses

Cars, vans, lorries and buses are a major source of air pollution in Europe, causing adverse effects on citizens' health.

This detrimental effect on health could be averted through robust Euro 7 Vehicle Emission Standards. Unfortunately, the proposal for the Euro 7 does not reach the level of ambition that is needed to create a meaningful change for a cleaner, safer, healthier environment.

Motor vehicles are a significant source of urban air pollution and are important contributors of anthropogenic carbon dioxide and other greenhouse gases. Traffic-related air pollution is a complex mixture of gases and particles resulting from the use of motor vehicles, including [nitrogen dioxide](#) (NO₂), elemental carbon (EC), ultrafine particles (UFP) and fine particle matter (PM_{2.5}). These pollutants can be emitted directly through the vehicle exhaust as tailpipe emissions but also from non-exhaust sources such as evaporative emissions of fuel, the [resuspension](#) of dust, the wear of brakes and tires, and the abrasion of road surfaces (which are collectively referred to as non-tailpipe emissions)¹. Research shows that near road traffic-related pollution may cause chronic disease, as well as exacerbation of related pathologies², and there are proven associations between long-term exposure to the most common traffic-related air pollutants (NO₂, EC, PM_{2.5}) and poor health outcomes.³

The proposed guidelines for vehicle emissions (what vehicles these would apply to, and when) will not provide enough incentive to transform the transport system in the short term and increases the risks of not sufficiently protecting the health of the population living in Europe.

Although the new rules do set emission limits for previously unregulated pollutants (i.e., nitrous oxide (NO_x) emissions from heavy-duty vehicles), there are concerns regarding certain aspects of the proposal.

For example, looking at the new sub-categories for Euro 7, there are some concerns on the “Euro 7G”, which considers a geo-fencing category. This would require that a plug-in hybrid car when driving in a low emission zone would only be allowed to use its battery and would not be permitted to use its combustion engine (LEZ). It is not clear yet how this will work in practice and one of the main risks will be the shift of pollution to other areas of a city or surrounding areas, negatively impacting local air quality.

Social and health inequalities should be firmly addressed as the benefits of clean air should be available to everyone, regardless of the area where they live. Moreover, this proposal will not be in

¹ [Long-term exposure to traffic-related air pollution and selected health outcomes: A systematic review and meta-analysis - ScienceDirect](#)

² [Chronic burden of near-roadway traffic pollution in 10 European cities \(APHEKOM network\) | European Respiratory Society \(ersjournals.com\)](#)

³ [Long-term exposure to traffic-related air pollution and selected health outcomes: A systematic review and meta-analysis - ScienceDirect](#)

line, and will therefore work to the detriment of, other European Union policies and commitments around climate, fossil fuels, transport and urban systems.

Air pollution in European cities causes high numbers of premature deaths per year, while also being linked to a wide range of serious illnesses including heart diseases, lung diseases and cancer. Some of the latest scientific research continues to show that there is no safe level of air pollution, and that road transport is still a major cause of toxic air right across the continent⁴.

According to the EEA report 'Air quality in Europe 2021', exposure to air pollution caused a significant burden of premature death and disease in the 27 EU Member States in 2019, with 307,000 premature deaths attributed to fine particulate matter and 40,400 to NO₂⁵.

A strong Euro7 would have further reduced the total nitrogen emissions avoiding premature deaths. Road transport remains the main source of toxic nitrogen dioxide emissions and the third largest source of PM_{2.5}, which can be particularly damaging to lung health.

EPHA and ERS see this proposal as a missed opportunity, as it fails to capture the chance to have a policy fit for purpose which can significantly reduce the health burden associated with motorised road transport in Europe.

By not acting on this issue with ambition the co-benefits for other environmental policies already in place, and in plan, in the European Union, will not be able to be captured. The European Green Deal, the Zero Pollution Action Plan, and the upcoming Ambient Air Quality Directives are all important examples of policies from which all European citizens health can benefit now and in the future. Leadership and political ambition are needed to drive the change that Europe needs in the field of transport, and this has yet to be seen in the current proposal.

⁴ Hoffman, B et al. Air pollution and health: recent advances in air pollution epidemiology to inform the European Green Deal: a joint workshop report of ERS, WHO, ISEE and HEI. European Respiratory Journal 2020 56: 2002575; DOI: 10.1183/13993003.02575-2020

⁵ [Emissions from road traffic and domestic heating behind breaches of EU air quality standards across Europe — European Environment Agency \(europa.eu\)](https://www.eea.europa.eu/en/press-releases/2021/04/emissions-road-traffic-domestic-heating-breaches-eu-air-quality-standards-across-europe)