

Response of the European Respiratory Society, the European Lung Foundation, and Lungs Europe to the Call for Evidence “EU environmental law – 2025 implementation review”

The European Respiratory Society, the European Lung Foundation, and Lungs Europe fully support the approach of the European Commission in its 2025 implementation review. This process is key to ensure a high level of health protection is maintained across the Union and it is particularly important that the measures - already put in place - continue to protect vulnerable groups, such as respiratory patients, as much as possible. This review is an opportunity to proactively address the gaps in implementation of not only the environmental laws but also to better join up and link with other legislation aimed at clean air in Europe.

1. Health Protection and Vulnerable Population

- Clean air and healthy environments can reduce the risk of developing respiratory diseases in the population, particularly in children and the elderly.
- People with respiratory diseases are among the most vulnerable groups impacted by adverse effects on the environment, such as climate change.
- Exposure to environmental factors such as air pollution, pollen, and other aeroallergens can affect several respiratory outcomes.
- There needs to be a focus on mitigating future health, environmental, and economic costs associated with respiratory issues.¹

2. Impact of Air Pollution on Respiratory Health

- Air pollution, particularly involving nitrogen dioxide (NO₂) and particulate matter (PM_{2.5}), poses a significant threat to respiratory patients (such as in individuals with asthma² and lung transplant patients).³
- Impaired respiratory functions (such as in patients with asthma, chronic obstructive pulmonary diseases (COPD), or cystic fibrosis) are strongly affected by changes in weather or extreme weather events, leading to an increased risk of mortality.

3. Recommendations for the Ambient Air Quality Directive

- Stricter limit values for the concentrations of five main pollutants in the atmosphere should adhere to the WHO air quality recommendations

¹ De Sario M., Katsouyanni K., Michelozzi P., Climate change, extreme weather events, air pollution and respiratory health. *Europe European Respiratory Journal* 2013 42: 826-843.

² Khreis H, Cirach M, Mueller N, et al. Outdoor air pollution and the burden of childhood asthma across Europe. *Eur Respir J* 2019; 54: 1802194

³ Ruttens D, Verleden SE, Bijmens EM, et al. An association of particulate air pollution and traffic exposure with mortality after lung transplantation in Europe. *Eur Respir J* 2017; 49: 1600484.

- This can help prevent 9.9% of the observed mortality in lung transplant recipients and that up to 11% of all incident childhood asthma cases.⁴

4. Review of the National Emissions reduction Commitments (NEC) Directive

- The state of implementation of the National Emissions reduction Commitments (NEC) Directive should be considered in this review to help inform the review of the NEC Directive (set to be completed by 2025)
- A report by the European Environmental Bureau (EEB) states that all Member States except one will not meet their emission reduction commitments by 2030.⁵
- This report considers that from 2030 onwards, more than half of the Member States will not adhere to their emission reduction commitments.⁶
- Disparities in emissions among Member States are primarily due to the burning of solid fuels for domestic heating and industrial use⁷
- The EU has responsibility under the EU Climate Law to address the anthropogenic emissions by sources of greenhouse gases, including methane.

As such it is critical for this review to monitor the emission reduction levels and highlight the necessary changes that Member States must bring about. We need to ensure adequate alignment with the NEC Directive as well as the atmospheric concentrations of the pollutants set out in the AAQD.

5. Integrating Legislations

- The ongoing climate crisis and its health effects shows the importance of connecting environment and health policies to other legislative files focusing on other areas, such as the 2040 climate targets, the restrictions on F-gases, Per- and polyfluoroalkyl substances (PFAS), the standards of vehicle emissions, energy efficiency, and so on.
- Regional and local authorities may benefit from additional support to implement effective measures to reduce air pollution from road traffic.⁸

⁴ ERS. Clean air in Europe: no delay, no exemptions, no more pollution – an ERS/ELF position statement. www.ersnet.org/news-and-features/news/clean-air-in-europe/. Date last updated: October 31 2023. Date last accessed: July 4 2024.

⁵ European Environmental Bureau. National Air Pollution Control Programmes: analysis and suggestions for the way forward. <https://eeb.org/wp-content/uploads/2020/12/EEB-NAPCP-Evaluation-Report.pdf>. Date last updated: December 2020. Date last accessed: March 12 2024.

⁶ European Environmental Bureau. National Air Pollution Control Programmes: analysis and suggestions for the way forward. <https://eeb.org/wp-content/uploads/2020/12/EEB-NAPCP-Evaluation-Report.pdf>.

⁷ European Environmental Agency. Harm to human health from air pollution in Europe: burden of disease 2023. www.eea.europa.eu/publications/harm-to-human-health-from-air-pollution. Date last updated: November 24 2023. Date last accessed: July 4 2024.

⁸ POLIS. POLIS and EUROCITIES call for strong Euro 7 standards to improve air quality. www.polisnetwork.eu/news/polis-and-eurocities-call-for-strong-euro-7-standards-to-improve-air-quality/. Date last updated: September 26 2023. Date last accessed: July 4 2024.

- Strategies such as promoting walking, cycling, and public transportation, adapting sustainable mobility initiatives for individuals with respiratory diseases, and establishing Low-Emission and Zero-Emission Zones are crucial.
- Additionally, advancing the transition to e-mobility will be vital in tackling air pollution.

The European Respiratory Society, the European Lung Foundation, and Lungs Europe strongly urge the European Commission to incorporate these considerations in the 2025 implementation review. This will ensure the health and well-being of all EU citizens, particularly the most vulnerable, are protected through robust environmental and health policies.