

ERS – ELF Response to the Call for Evidence: Simplification of Administrative Burden in Environmental Legislation

The European Respiratory Society (ERS)¹ and the European Lung Foundation(ELF)² appreciate the Commission’s efforts to streamline environmental legislation and reduce unnecessary administrative burden.

However, it is essential that such simplification does not compromise in any respect the EU’s environmental and health protection objectives avoiding having a negative impact on respiratory health. Respiratory diseases are among the leading causes of morbidity and mortality in Europe³, with air pollution being the second most important cause of respiratory disease and mortality⁴ in Europe. Air pollution is responsible for over 300,000 premature deaths annually in the EU⁵. Any reform to environmental legislation must reflect and preserve the right to clean air and a healthy environment as enshrined in EU and WHO principles^{6,7}.

Key Recommendation:

- Simplification measures must not weaken monitoring, reporting, or enforcement mechanisms, as these are vital for ensuring compliance with EU environmental standards. The goal must remain to strengthen the EU’s ability to monitor, enforce, and improve air quality and other environmental determinants of health.

¹ European Respiratory Society. <https://www.ersnet.org/the-society/who-we-are/>. Date last updated n.d. Date last accessed August 22 2025.

² European Lung Foundation. <https://europeanlung.org/en/>. Date last updated n.d. Date last accessed September 10 2025.

³ World Health Organisation. Chronic respiratory diseases in the WHO European Region. <https://www.who.int/europe/publications/i/item/WHO-EURO-2025-12340-52112-79990>. Date last updated: 12 June 2025. Date last accessed: August 21 2025.

⁴ World Health Organisation. Chronic respiratory diseases in the WHO European Region. <https://www.who.int/europe/publications/i/item/WHO-EURO-2025-12340-52112-79990>. Date last updated: 12 June 2025. Date last accessed: September 1 2025.

⁵ European Parliament. Air pollution: Parliament adopts revised law to improve air quality. <https://www.europarl.europa.eu/news/en/press-room/20240419IPR20587/air-pollution-parliament-adopts-revised-law-to-improve-air-quality>. Date last updated April 24 2024. Date last accessed August 22 2025.

⁶ European Parliament. Air pollution: Deal with Council to improve air quality. <https://www.europarl.europa.eu/news/en/press-room/20240219IPR17816/air-pollution-deal-with-council-to-improve-air-quality#:~:text=Stricter%20air%20quality%20standards%20and,systems%20causing%20the%20pollution%20exceedances>. Date last updated February 20 2024. Date last accessed August 22 2025.

⁷ World Health Organisation. What are the WHO Air quality guidelines? <https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines>. Date last updated September 22 2021. Date last accessed August 22 2025.

- Any reduction in reporting should not diminish the data quality, accessibility, usability and digitalisation of information. Environment and health data need to be robust, transparent, and usable for policymakers, scientists, public health authorities, and health care professionals.
- A health check mechanism should be established when administrative requirements are streamlined, to guarantee that health data and safeguards remain intact.
- Foster digital platforms that integrate environmental and health data, facilitating transparent reporting and accessibility for researchers and policymakers.
- Engage health stakeholders in the design of simplification measures to ensure that respiratory and public health considerations are fully integrated.

ERS and ELF support the Commission's aim to make legislation more efficient and user-friendly, provided that these reforms continue to uphold Europe's high standards for environmental protection and human health. Simplification should ultimately lead to better enforcement, better data, and better health outcomes for European citizens and we would welcome the opportunity to contribute expertise to ensure that health considerations remain central as the Commission develops this initiative.