

ERS – ELF Response to the Consultation on the Amendment of the European Climate Law.

The European Respiratory Society (ERS)¹ and the European Lung Foundation (ELF)² appreciate the efforts made by the European Commission on the proposal to amend Regulation (EU) 2021/1119 (the European Climate Law) which aims at including a 2040 climate target.³

Climate change is one of the greatest threats to health worldwide, with profound implications for respiratory health. Rising global temperatures, worsening air pollution, increased frequency of wildfires, dust storms, heavy rainfall and floodings, changes in pollen exposure⁴ and easier transmission of infectious diseases all have serious effects on lung health. Air pollution alone is responsible for over 300,000 premature deaths per year in Europe, the majority from cardiovascular and respiratory causes, and climate change worsens the health impacts of air pollution. Air pollution, heatwaves and climate-induced extreme events disproportionately affect people living with chronic respiratory conditions such as asthma and COPD. Children, older people, and vulnerable populations face the highest risks, also exacerbating health inequalities.^{5,6,7,8}

ERS and ELF strongly support the introduction of a 2040 target. An intermediate milestone is essential to ensure that all Member States remain on track to achieve the

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 15 2025.

³ European Commission. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14397-European-Climate-Law-amendment_en. Date last updated n.d. Date last accessed September 11 2025.

⁴ Such as earlier onset of pollen season, changes in the pollen mix, longer durations and more intense pollen seasons.

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 Environment Agency. Exposures aggravated by climate change. <https://www.eea.europa.eu/en/analysis/publications/beating-chronic-respiratory-disease/climate-change-and-respiratory-disease>. Date last updated November 7 2024. Date last accessed September 11 2025.

⁷ Lewy J R, Karim A N, Lokotola C L, The impact of climate change on respiratory care: A scoping review Science Direct <https://doi.org/10.1016/j.joclim.2024.100313>

⁸ Tran H M, Chuang T, Chuang H, Climate change and mortality rates of COPD and asthma: A global analysis from 2000 to 2018 <https://doi.org/10.1016/j.envres.2023.116448>

EU's overarching objective of climate neutrality by 2050. The target should be grounded in scientific evidence and follow ambitious emissions reduction pathways.

To this end, ERS and ELF urge the Commission to establish clear criteria for the use of credits. While credits may play a limited role in supporting flexibility, over-reliance or poorly defined mechanisms risk undermining genuine emissions reductions and delaying essential action. Therefore:

- Credits should be strictly limited and transparently reported.
- Definitions and criteria must prevent loopholes that allow Member States or industries to avoid real emissions cuts.
- Priority must always be given to direct emissions reductions, which simultaneously reduce pollution exposure and improve health outcomes.

The amendment of the European Climate Law is a critical step towards ensuring that Europe meets its climate neutrality objectives while safeguarding public health.