

# Public consultation on "air quality - revision of EU rules"

Fields marked with \* are mandatory.

## Introduction

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### Background

Clean air is essential for our health and that of the environment. To this end, the EU – via the [Ambient Air Quality Directives](#) - sets air quality standards to avoid the build-up of excessive air pollutant concentrations (see an overview of the [EU air quality standards](#) below).

These Directives also define common methods to monitor, assess and inform on ambient air quality in the European Union. Furthermore, they require action, when standards are exceeded, in order to avoid, prevent or reduce harmful effects on human health and the environment as a whole.

As part of the [European Green Deal](#) and its [Zero Pollution Action Plan](#), the EU is revising these EU air quality standards, to align them more closely with the recommendations of the World Health Organization. Note that the World Health Organization publishes and updates [Air Quality Guidelines](#), most recently in 2021: these updated Air Quality Guidelines are considered in the ongoing revision of EU rules.

This revision also aims to improve overall EU legislation for clean air, including provisions on penalties in case of exceedances or requirements for public information, as well as propose means to strengthen air quality monitoring, modelling and plans to help local authorities achieve cleaner air.

<i>Pollutant</i>	<i>Concentration</i>	<i>Averaging period</i>	<i>Permitted exceedances each year</i>
Fine particulate matter (PM <sub>2.5</sub> )	25 µg/m <sup>3</sup>	1 year	n/a
Particulate matter (PM <sub>10</sub> )	50 µg/m <sup>3</sup>	24 hours	35
	40 µg/m <sup>3</sup>	1 year	n/a
Sulphur dioxide (SO <sub>2</sub> )	350 µg/m <sup>3</sup>	1 hour	24
	125 µg/m <sup>3</sup>	24 hours	3
Nitrogen dioxide (NO <sub>2</sub> )	200 µg/m <sup>3</sup>	1 hour	18
	40 µg/m <sup>3</sup>	1 year	n/a
Lead (Pb)	0.5 µg/m <sup>3</sup>	1 year	n/a
Carbon monoxide (CO)	10 mg/m <sup>3</sup>	Max. daily 8 hour mean	n/a
Benzene (C <sub>6</sub> H <sub>6</sub> )	5 µg/m <sup>3</sup>	1 year	n/a
Ground-level ozone (O <sub>3</sub> )	120 µg/m <sup>3</sup>	Max. daily 8 hour mean	25 averaged over 3 years
Arsenic (As)	6 ng/m <sup>3</sup>	1 year	n/a
Cadmium (Cd)	5 ng/m <sup>3</sup>	1 year	n/a
Nickel (Ni)	20 ng/m <sup>3</sup>	1 year	n/a
Polycyclic Aromatic Hydrocarbons (expressed as Benzo(a)pyrene)	1 ng/m <sup>3</sup>	1 year	n/a

Table 1: EU air quality standards (Pollutant; Concentration; Averaging period; Permitted exceedances each year)

## Why are we consulting you?

The Commission has launched an [impact assessment](#) to support the Ambient Air Quality Directives revision.

In line with the Commission's [Better Regulation](#) agenda, this public consultation questionnaire will inform the revision process, and the views collected will be considered in the impact assessment, especially when designing potential (regulatory and non-regulatory) measures to reduce air pollution, strengthen air quality monitoring, modelling and plans, and reduce the related impacts on environment and society.

All citizens and organisations are welcome to contribute to this consultation. Contributions are particularly sought from national / regional / local authorities in the Member States, enforcement bodies, business and trade organisations' representatives and civil society organisations, academia, medical professionals, patient organisations, relevant international organisations, and the general public.

## Guidance on the questionnaire

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This survey is divided into the following parts:

- **Part 1: About you** – questions about yourself and why you are answering this questionnaire.
- **Part 2: General questions section** – on your views on air quality issues. This section does not require technical or expert knowledge of the Directives, and anyone can answer.
- **Part 3: Specialised questions section** – on your views on air quality measures and their impacts. This section focuses on more technical aspects of the topics/measures considered by the Directives' revision and may therefore require expert knowledge to answer. This section can be skipped, if preferred.
- **Part 4: Concluding questions & remarks** - share your thoughts on topics not covered by the questions and provide further information. This section invites you provide any additional comments or elaborate on relevant issues that have not been addressed by the questions.

We estimate that replying to all questions would take about 15 to 30 minutes. Please note that not all questions in the questionnaire need to be answered. In addition, all 'mandatory' questions include an "I do not know/not relevant" or "No opinion" option that you can use when you do not know the answer or do not have an opinion.

You are invited to respond to the best of your abilities or knowledge of the topic. Please use open fields only if there is information to be added that is strictly relevant to the related question.

The results of the questionnaire and a stand-alone summary of the results of the consultation will be produced (to be published [here](#)). The analysis of the responses will be included in the impact assessment supporting the revision of the Ambient Air Quality Directives. Please take note of the specific privacy statement for this consultation which explains how personal data and contributions will be dealt with.

In the interest of transparency, if you are replying on behalf of an organisation, please register with the [register of interest representatives](#) if you have not already done so. Registering commits you to complying with a Code of Conduct. If you do not wish to register, your organisation's contribution will be treated and published together with those received from individuals.

Your voice matters and we are grateful to you for taking the time to complete this consultation.

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Axel

\* Surname

STEINSBERG

\* Email (this won't be published)

axel.steinsberg@wko.at

\* Country of origin

Please add your country of origin, or that of your organisation.

- |                                      |  |                                     |  |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan    | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands  | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania        | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria        | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg    | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt              | <input type="radio"/> Macau         | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra        | <input type="radio"/> El Salvador        | <input type="radio"/> Madagascar    | <input type="radio"/> São Tomé and Príncipe            |
| <input type="radio"/> Angola         | <input type="radio"/> Equatorial Guinea  | <input type="radio"/> Malawi        | <input type="radio"/> Saudi Arabia                     |
| <input type="radio"/> Anguilla       | <input type="radio"/> Eritrea            | <input type="radio"/> Malaysia      | <input type="radio"/> Senegal                          |

- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand

- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna

- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Rwanda
- Saint Barthélemy
- Saint Helena
- Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

**\* Organisation name**

*255 character(s) maximum*

Austrian Federal Economic Chamber (WKO - Wirtschaftskammer Österreich): 578,000 Austrian companies in the sectors industry, trade, small manufacturing, transport, banking & insurance, tourism as well as services

**\* Organisation size**

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

**\* Scope**

- International
- Local
- National
- Regional

**Transparency register number**

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

10405322962-08

**\* Please indicate the sector(s) you are active in**

*between 1 and 3 choices*

between 1 and 3 answered rows

- air quality management

- air quality monitoring
- agriculture / food
- biodiversity and/or environment
- energy
- government
- health care
- investment and finance
- manufacturing
- public health
- raw materials extraction / primary processing
- scientific research
- transport
- none of the above sectors
- other
- I do not know, or I do not want to answer

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

#### **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.



**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

## Part 2: General questions section

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### 1. How important is having good air quality to you?

- Very important
- Important
- Of minor importance
- Not important at all
- No opinion

### 2. How concerned are you about the levels of air pollution to which you are usually exposed?

- Very concerned
- Concerned
- Slightly concerned
- Not concerned at all
- No opinion

### 3. Are you concerned about the following impacts that air pollution may have in your local area?

	Not at all	To some extent	To a large extent	Fully	No opinion
Impacts on health of the general population	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on my health or the health of my family members	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Impacts on health of vulnerable groups (including children, elderly, people with pre-existing health conditions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on businesses and small/medium enterprises (including lost work days due to air pollution)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on agriculture and crops (including on plant growth and animal health)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on natural environment (including pollution of water bodies, or reduced biodiversity)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on buildings and infrastructure (including corrosion or discoloration of buildings)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### 4. Which air pollutants are you concerned about?

- Fine particulate matter (PM2,5)
- Particulate matter (PM10)
- Sulphur dioxide (SO2)
- Nitrogen dioxide (NO2)
- Ground-level ozone (O3)
- Carbon monoxide (CO)
- Benzene (C6H6)
- Polycyclic aromatic hydrocarbons (including benzo(a)pyrene)
- Arsenic (As)
- Cadmium (Cd)

- Mercury (Hg)
- Nickel (Ni)
- Lead (Pb)
- Ultra-fine particles
- Black carbon and/or elemental carbon
- Ammonia (NH<sub>3</sub>)
- Methane (CH<sub>4</sub>)
- Non-methane volatile organic compounds (i.e. organic compounds capable of producing photochemical oxidants by reaction with nitrogen oxides in the presence of sunlight)
- None
- No opinion
- Other

If "other", please specify:

*100 character(s) maximum*

WKO is concerned about lacking balanced interests, too, e.g. health aspects vs individual mobility.

### 5. Would you like to see more action to improve air quality? And if so, to what extent?

- Yes, a **significant** increase in action and ambition to tackle air pollution
- Yes, a **moderate** increase in action and ambition to tackle air pollution
- Yes, a **small** increase in action and ambition to tackle air pollution
- No, current action and ambition to tackle air pollution issues **is adequate**
- No opinion

### 6. At what level should further action be taken?

Please rank the following from 1 – where most action needs to be taken to 5 – where least action needs to be taken

	1	2	3	4	5
International	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
National	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Regional	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local / city	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**7. To what extent would you be willing to change your own way of living to contribute to improving air quality in your country / region / city?**

	Not at all	To some extent	To a large extent	Fully	I do not know	N/A
Driving less by car, including in cities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Driving smaller or fuel-efficient cars	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using more public transport, walking, cycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changing my habits in residential heating	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investing in sustainable heating systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving the energy efficiency of my home	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making conscious consumption choices to reduce emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify:

*100 character(s) maximum*

Business decisions are based on environmental standards rather than personal change of behaviour.

**Policy area 1: Closer alignment of the EU air quality standards with scientific knowledge including the latest recommendations of the World Health Organization (WHO).**

The Ambient Air Quality Directives set air quality standards for 13 air pollutants. For several air pollutants, these standards are not as stringent as recommended by the World Health Organization via their ‘Air Quality Guidelines’ (which themselves have recently been updated), in particular for the most harmful fine particulate matter (PM2.5). This revision of EU rules will consider and assess different policy options and scenarios to more closely align EU air quality standards with the latest scientific evidence.

**8. Do you think that EU air quality standards should be made more stringent to bring them in line with the updated World Health Organization Air Quality Guidelines and latest scientific evidence?**

- Yes – EU air quality standards should be made more stringent, fully aligned with the latest WHO recommendations
- Partly – EU air quality standards should be made more stringent, but only partially aligned with the latest WHO recommendations
- No – current air quality standards are sufficient
- No opinion

**9. Where (at which locations) should EU air quality standards apply?**

- Everywhere, including at locations to which members of the public do not have access, including industrial installations or motorways
- At all locations where there is fixed habitation or there are commercial facilities, as well as at all locations to which members of the public have access (including, for example, roads and sidewalks)
- At all locations where there is fixed habitation or there are commercial facilities
- Only at locations that are representative of the exposure to air pollutants of the general population
- No opinion

**10. How quickly should any revised EU air quality standards be achieved?**

- As soon as possible
- By 2025 at the latest
- By 2030 at the latest
- By 2040 at the latest
- By 2050 at the latest
- No opinion

**11. Do you have any other comments regarding the consideration to amend the EU's air quality standards (this could capture existing achievement of or options to amend the standards, and the feasibility or impacts of such options)?**

*800 character(s) maximum*

All Member States must achieve the current EU limit value level until 2030 before new targets can be approached. Decarbonisation based FF55 and EGD will have fundamental effects on air quality – but until now it is unclear how fast this will be the case. Therefore, EU limit values based on WHO guidelines can be determined only, if the reduction pathway of Fit for 55 is on track. Tightening standards can only be the next step, if it is clear, a) how current compliance can be reached and b) that sufficient organizational, technical and financial resources are available to comply with the new standards in the EU. Furthermore EU population has to be sufficiently informed about which changes in personal behavior and monetary investment are associated with these new standards.

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**Policy area 2: improving the current air quality legislative framework (including aspects such as penalties and public information).**

There have been substantial delays in taking appropriate and effective measures to meet all EU air quality standards throughout Member States. Improvements to the legislative framework, including related to access to justice in case of persistent exceedance, as well as to public information, may facilitate further air quality action. This revision of EU rules will consider and assess different policy options for amended provisions on sanctions and penalties to be established in national systems for non-fulfilment of relevant obligations deriving from the Directives. It will also consider options for a stronger harmonisation of public information.

**12. Do you believe that the current provisions on penalties in the Ambient Air Quality Directives are sufficient for Member States to comply with EU air quality standards?**

- Yes
- Partly
- No
- No opinion

**13. Do you believe that the Ambient Air Quality Directives should facilitate access to justice, including compensation for health damages due to air pollution (suffered by groups and/or individuals)?**

- Yes – both stronger facilitation of access to justice in general, as well as of compensation for health damages due to air pollution in particular
- Partly – stronger facilitation of access to justice related to air pollution
- Partly – compensation for health damages due to air pollution
- No
- No opinion

**14. How well informed do you feel about air quality in your country / region / city?**

- Very well informed
- Well informed
- Somewhat informed
- Little informed
- Not informed at all
- No opinion

**15. Which of the following types of information would you want to have easier access to?** (Multiple answers possible)

- (Real-time) air quality data / Up-to-date average concentrations
- Annual reports specifically targeted to the general public
- Air pollution forecasts
- Air quality plans and measures the authorities are taking to improve air quality
- Air quality monitoring networks (e.g. location of monitoring stations, pollutants monitored, etc.)
- Information on whether air quality standards are respected
- Air quality benchmarks that allow comparison with other cities/regions
- Access to downloadable historical data sets
- Information on specific precautions and preventative actions
- General information on short term & long term health risks of air pollution
- Alert/ targeted messaging during high pollution events
- Information on citizens' rights and possible actions if air quality standards are not respected
- Other

If "other", please specify:

*100 character(s) maximum*

These answers refer to the Austrian situation. Other Member States should have compatible standards.

**16. Are there any other elements related to the legislative framework of the Ambient Air Quality Directives (i.e. around defining the types of air quality standards and actions exceedances trigger, governance and enforcement of actions at MS level, and around information provided to the public) that you would consider effective in facilitating the achievement of its objectives?**

*800 character(s) maximum*

All Member States must achieve the current EU limit value level until 2030 before new targets can be approached. Decarbonisation based FF55 and EGD will have fundamental effects on air quality – but until now it is unclear how fast this will be the case. Therefore, EU limit values based on WHO guidelines can be determined only, if the reduction pathway of Fit for 55 is on track. Tightening standards can only be the next step, if it is clear, a) how current compliance can be reached and b) that sufficient organizational, technical and financial resources are available to comply with the new standards in the EU. Furthermore EU population has to be sufficiently informed about which changes in personal behavior and monetary investment are associated with these new standards.

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### **Policy area 3: strengthening of air quality monitoring, modelling and plans.**

The Ambient Air Quality Directives have guided the establishment of a robust system for air quality assessment and have framed competent authorities' action to achieve cleaner air via air quality plans (i.e. the action taken when and where exceedances occur). However, the criteria on air quality monitoring and modelling could be refined to increase the comparability of air quality data. This revision of EU rules will explore solutions to improve, simplify and increase precision and coherence of requirements with regard to air quality monitoring and modelling, and options to facilitate further the effectiveness of air quality plans.

#### **17. Do you see a need to strengthen further the assessment of air quality?**

(Multiple answers possible)

- Yes, we need additional monitoring everywhere, whether high pollution or low pollution levels
- Yes, we need additional monitoring where pollution may be a concern
- Yes, we need additional monitoring of background concentrations (i.e. average pollution levels)
- Yes, we need additional monitoring at locations with pollution peaks due to industrial emissions
- Yes, we need additional monitoring at locations with pollution peaks due to traffic emissions
- Yes, we need to ensure detailed modelling of air quality across the EU
- Yes, we need to ensure detailed modelling of air quality at locations with pollution peaks (e.g. due to traffic or industry)
- Yes, we need to ensure detailed modelling and forecasting of air pollution episodes
- No, we have sufficient data on air quality
- No opinion



**18. Do you see a need to improve air quality plans developed by local authorities to address exceedances of EU air quality standards? (Multiple answers possible)**

- Yes, air quality plans need to be clearer on the specific sources and origin of air pollution
- Yes, air quality plans need to explain the health consequences of air pollution
- Yes, air quality plans need to assign responsibilities (i.e. who needs to act)
- Yes, air quality plans need to quantify the costs and benefits of action
- Yes, air quality plans need to spell out how each measure contributes to solving pollution problems
- Yes, air quality plans need to estimate by when action would have resolved the pollution problem
- Yes, air quality plans need to be followed-up by a regular assessment of their implementation
- No need to change air quality plans
- No need to change air quality plans, but they need to be better implemented
- No opinion

**19. Do you have any comments regarding the improvements of monitoring, modelling and the content of air quality plans (e.g. existing effectiveness, options to improve these elements, and the feasibility or impacts of such options)?**

*800 character(s) maximum*

We welcome transparent, harmonised and high-quality monitoring and modeling standards as the basis for more comparability in the EU. With today's technical means, modeling is the key to better management of areas with a large number of particularly sensitive population groups. Monitoring should also be able to distinguish between background concentrations and anthropogenic emissions.

### **Part 3: Specialised questions section**

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**\* 20. Please indicate if you would like to answer this more specialised questions section on your views on air quality measures and their impacts. This section focuses on more technical aspects of the topics/measures considered by the Directives' revision**

- Yes, I would like to reply to this section with more specialised questions (to Part 3)
-

No, I would like to skip ahead to the final section of this questionnaire (to Part 4)

**21. How important are the following options for *policy area 1\** to improve the effectiveness of the Ambient Air Quality Directives?**

\*Closer alignment of the EU air quality standards with scientific knowledge including the latest recommendations of the World Health Organization (WHO).

	Of high importance	Of medium importance	Of low importance	Not at all important	No opinion
a) Ensure achievement of existing EU air quality standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Align EU air quality standards with World Health Organization recommendations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
e) Establish legally enforceable limit values for all air pollutants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

WHO Air Quality  
Guidelines)

**Please explain your answer, if you wish**

*100 character(s) maximum*

	<i>100 character(s) maximum</i>
a) Ensure achievement of existing EU air quality standards	Yes, existing regulations have to be met to be credible.
b) Align EU air quality standards with World Health Organization recommendations	Health recommendations can not be limit values automatically. A tiered approach is necessary.
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	It is important for the existing legislation and standards to be effectively implemented in all MS, before reducing standards to levels that are costly.
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)	The expansion of the directive's scope makes no sense and would only raise further scientific questions.
e) Establish legally enforceable limit values for all air pollutants	Health recommendations can not be limit values automatically. A tiered approach is necessary.
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)	Health recommendations can not be limit values automatically. A tiered approach is necessary.
Other	

**22. *How important* are the following options for *policy area 2* to improve the effectiveness of the Ambient Air Quality Directives?**

\* Improving the current air quality legislative framework (including aspects such as penalties and public information).

	Of high importance	Of medium importance	Of low importance	Not at all important	No opinion
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Further define the different types of air quality standards and the actions their exceedances would trigger	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Expand requirements for action by national / regional / local authorities in case of exceedances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Establish additional provisions for air quality plans, including on who to involve in their preparation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Expand the provision on penalties related to air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
f) Add provisions for access to justice and for compensation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

for health damage from air pollution					
g) Expand the requirements on the provision of information (e.g. on health impacts)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**Please explain your answer, if you wish**

*100 character(s) maximum*

	<i>100 character(s) maximum</i>
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress	All standards should be in line not only with scientific findings but especially with technical progress, otherwise it would be impossible to effectively implement legislation.
b) Further define the different types of air quality standards and the actions their exceedances would trigger	A differentiation is needed between longterm (YMV) and shortterm (DMV) limit values f.e. for PM10 concerning their triggering consequences.
c) Expand requirements for action by national / regional / local authorities in case of exceedances	Certain regional leeway is needed for flexible adaption of measures to local circumstances.
d) Establish additional provisions for air quality plans, including on who to involve in their preparation	The two years for making the plans are too short and in general harmonised standards would be helpful
e) Expand the provision on penalties related to air pollution	The expansion of penalties does not necessarily lead to better air quality. Cooperation of EC with Member States, focus on hotspots and extra financial means for these hotspots would be preferable.
f) Add provisions for access to justice and for compensation for health damage from air pollution	Objection: Do we really want to "americanise" EU legislation and implementation?
g) Expand the requirements on the provision of information (e.g. on health impacts)	
Other	

**23. *How important* are the following options for *policy area 3* to improve the effectiveness of the Ambient Air Quality Directives?**

\* Strengthening of air quality monitoring, modelling and plans.

	Of high importance	Of medium importance	Of low importance	Not at all important	No opinion
a) Establish more detailed rules on the location of sampling points	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Expand monitoring requirements to broader set of harmful air pollutants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Enable enhanced use of modelling for air quality assessment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Further specify minimum elements required of air quality plans (e. g. cost-benefit analysis, projections, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**Please explain your answer, if you wish**

*100 character(s) maximum*

	<i>100 character(s) maximum</i>
a) Establish more detailed rules on the location of sampling points	Better resolution is needed for modelling anyway
b) Expand monitoring requirements to broader set of harmful air pollutants	Focus on PM and NO2 seems to be sufficient
c) Enable enhanced use of modelling for air quality assessment	Modelling is needed for transparency of health relevance
d) Further specify minimum elements required of air quality plans (e.g. cost-benefit analysis, projections, etc.)	Cost-benefit analysis, identification of causes and polluter share, monitoring of measures etc.
Other	

**24. How feasible (i.e. technically, politically, from a cost perspective, etc.) would the following policy measures related to *policy area 1\** be to implement?**

\*Closer alignment of the EU air quality standards with scientific knowledge including the latest recommendations of the World Health Organization (WHO).

	High feasibility	Medium feasibility	Low feasibility	Not at all feasible	No opinion
a) Ensure achievement of existing EU air quality standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Align EU air quality standards with World Health Organization recommendations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
e) Establish legally enforceable limit values for all air pollutants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

e. as per updated WHO Air Quality Guidelines)					
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**Please explain your answer, if you wish**

*100 character(s) maximum*

	<i>100 character(s) maximum</i>
a) Ensure achievement of existing EU air quality standards	See answers to question 21
b) Align EU air quality standards with World Health Organization recommendations	See answers to question 21
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	See answers to question 21
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)	The focus should be for air quality standards to be met in areas where people live.
e) Establish legally enforceable limit values for all air pollutants	See answers to question 21
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)	See answers to question 21
Other	

**25. How feasible (i.e. technically, politically, from a cost perspective, etc.) would the following policy measures related to *policy area 2\** be to implement?**

\* Improving the current air quality legislative framework (including aspects such as penalties and public information).

	High feasibility	Medium feasibility	Low feasibility	Not at all feasible	No opinion
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Further define the different types of air quality standards and the actions their exceedances would trigger	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Expand requirements for action by national / regional / local authorities in case of exceedances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Establish additional provisions for air quality plans, including on who to involve in their preparation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Expand the provision on penalties related to air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
f) Add provisions for access to justice and for compensation for health damage from air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

g) Expand the requirements on the provision of information (e.g. on health impacts)



**Please explain your answer, if you wish**

*100 character(s) maximum*

	<i>100 character(s) maximum</i>
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress	See answers to question 22
b) Further define the different types of air quality standards and the actions their exceedances would trigger	See answers to question 22
c) Expand requirements for action by national / regional / local authorities in case of exceedances	See answers to question 22
d) Establish additional provisions for air quality plans, including on who to involve in their preparation	See answers to question 22
e) Expand the provision on penalties related to air pollution	See answers to question 22
f) Add provisions for access to justice and for compensation for health damage from air pollution	See answers to question 22
g) Expand the requirements on the provision of information (e.g. on health impacts)	See answers to question 22
Other	

**26. How feasible (i.e. technically, politically, from a cost perspective, etc.) would the following policy measures related to *policy area 3\** be to implement?**

\* Strengthening of air quality monitoring, modelling and plans.

	High feasibility	Medium feasibility	Low feasibility	Not at all feasible	No opinion
a) Establish more detailed rules on the location of sampling points	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Expand monitoring requirements to broader set of harmful air pollutants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Enable enhanced use of modelling for air quality assessment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Further specify minimum elements required of air quality plans (e. g. cost-benefit analysis, projections, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**Please explain your answer, if you wish**

*100 character(s) maximum*

	<i>100 character(s) maximum</i>
a) Establish more detailed rules on the location of sampling points	See the answers to question 23
b) Expand monitoring requirements to broader set of harmful air pollutants	See the answers to question 23
c) Enable enhanced use of modelling for air quality assessment	See the answers to question 23
d) Further specify minimum elements required of air quality plans (e.g. cost-benefit analysis, projections, etc.)	See the answers to question 23
Other	

**27. If you believe that some measures listed above are incoherent with EU strategies (e.g. the European Green Deal), incoherent with EU sectoral policies (e.g. on transport, energy or agriculture), or incoherent with national level policies, could you please briefly elaborate on your answer?**

*600 character(s) maximum*

- Positive interactions with climate policy are not clear
- Broadening the IED (circular economy, CO2) might make the achievement of objectives more ineffective - it is effective to focus on air and water
- Improvements of air quality through decarbonization could be slowed down if plant- and infrastructure-projects are delayed or even prevented by citizen protests (public participation, access to justice) or concerns about biodiversity, etc.

## **Part 4: Concluding questions & remarks**

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## 28. What is your level of knowledge of the following?

	Excellent knowledge / understanding	Good knowledge / understanding	Some knowledge / understanding	Little knowledge / understanding	None
Issue of air pollution in general	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different pollutants and their sources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Areas most affected by air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detrimental impacts of exposure to air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
International initiatives to tackle air pollution (including World Health Organization guidelines)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<a href="#">European legislation to tackle air pollution</a>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementation of European legislation to tackle air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**29. If you wish to expand on any of your answers or if you wish to add comments or information on anything else, which is relevant to the Impact Assessment, please do so in the box below.**

*800 character(s) maximum*

We suggest the introduction of a tiered approach as mentioned above, with binding air quality standards, WHO target values and interim target values for the time in between. Furthermore, flexibilities can address orographic, meteorological or climatic impacts.

**30. If you consider there are materials / publications available online that should be considered further in relation to this Impact Assessment exercise, please feel free to describe them (title and author) in the box below and include any relevant links**

*800 character(s) maximum*

11.6.2019 WKO study done by the scientific institute "Joanneum Research" on air quality in the city of Graz  
Link: HYPERLINK "[https://www.joanneum.at/policies/aktuelles/news/news-detail/grazer\\_feinstaubstudie](https://www.joanneum.at/policies/aktuelles/news/news-detail/grazer_feinstaubstudie)"  
Study Joanneum Website

**31. Do you have additional information that you would like to share in a concise document such as a position paper? (This is optional and will serve as additional background to better understand your position.)**

The maximum file size is 1MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

**a53cb0cc-9dd5-4768-8750-6801bb38485f**

**/a040914LUFklimaKONSULT\_211215\_Luft\_AAQD\_EN\_Position\_V20\_clean.pdf**

## **Background Documents**

Cuadro ES

Lentelė LT

Quadro PT

Tabel DA

Tabel ET

Tabel NL

Tabela PL

Tabela SL

Tabell SV

Tabella IT

Tabella MT

Tabelle DE

Tabelul RO

Tableau FR

Tablica HR

Tabula LV

Tabulka CS

Tabuľka SK

Taulukko FI.

Tblzat HU

ί EL

Таблица BG

## **Contact**

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