

Consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies

Section 1/6: Introductory Questions	
A. Are you responding to this consultation as an individual or on behalf of an organisation? -single choice reply-(compulsory)	On behalf of an organisation
A1. What type of organisation do you represent? -single choice reply-(compulsory)	business: industrial interest group, business association, sectoral association
A1a. Please specify the sector of your activity (e.g. health, environment, transport, energy, multi-sector): -open reply-(optional)	Cement Industry
A2. Does your organisation work mainly on an EU-wide basis or in a single country? -single choice reply-(compulsory)	Focus on a single country
A3. Please indicate the country where your organisation is located: -single choice reply-(compulsory)	United Kingdom
A4. Please indicate the name of your organisation: -open reply-(compulsory)	Mineral Products Association
A5. Please indicate your name and title: -open reply-(compulsory)	Dr Diana Edwards, Technical Advisor Energy and Climate Change
B. Do you now work on air pollution issues, or have you done so in the past? -single choice reply-(compulsory)	Yes, air pollution has been one issue in my professional work
D. Please feel free to provide any further details regarding your answers to the introductory questions: -open reply-(optional)	
<p>The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 465 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME companies throughout the UK, as well as the 9 major international and global companies. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.</p>	
<p>Unless you specify otherwise, your contribution will be published on the Commission's website. Please indicate here if you wish your contribution to be anonymous.(For full information please refer to the Specific Privacy Statement point 3)</p> <p>-single choice reply-(compulsory)</p>	You can publish this contribution as it is.
Section 2/6: Ensuring compliance with EU air quality requirements and coherence with international commitments in the short term	

1. How should the EU modify or supplement its approach to ensure compliance with current air quality legislation? (Please choose one or more responses) -multiple choices reply-(compulsory)	Additional non-legislative options: for example by establishing partnership agreements with MS that focus Member State efforts to address non-compliance with air quality objectives
1a. Which options should be considered as additional non-legislative measures? (Please choose one or more responses) -multiple choices reply-(compulsory)	Partnership implementation agreements negotiated between the Commission and Member States in infringement, where further legal action would be suspended subject to proper implementation of agreed transparent and binding programmes to address air pollution

2. Please feel free to provide written comments on the course of action to ensure compliance with the current air quality legislation: -open reply-(**optional**)

More information is required on partnership agreements. How will the process be made transparent? Member States negotiating behind closed doors could extend the potential for uneven implementation across the EU and could have effects on the market. The focus should be on enforcing current obligations to ensure they are properly implemented. It is only NOx that is failing at NECD level so there is no need for more stringent obligations on air pollution emissions but they should be aligned with the recently agreed 2020 ceilings in the Gothenburg Protocol. This will ensure an international level playing field and the prioritisation of actions on the basis of cost effectiveness.

Section 3/6: Further reducing exposure to damaging air pollution in the medium to long term

Sub-section 3.1: Ensuring coherence between air pollution and climate change policies

3. How should future EU air pollution policy interact with a new climate and energy framework for 2030? (Please choose one response) -single choice reply-(compulsory)	It should maximise the synergies between the policies, but with no new air pollutant emissions reductions except those delivered by the climate and energy policy
4. Should specific complementary action in the EU be pursued to curb emission of short-lived climate pollutants (SLCP) and their precursors, to improve both air quality impacts on health but also to boost climate mitigation in the short term? -single choice reply-(compulsory)	Yes
4a. Should specific complementary action be pursued to curb black carbon emissions? (Please choose one response) -single choice reply-(optional)	Don't know
4b. Should specific action to address ozone precursors that are short-lived climate pollutants, such as methane, be reinforced? (Please choose one response) -single choice reply-(optional)	Don't know

5. Please feel free to provide comments on the interaction between air pollution and climate change policies: -open reply-(**optional**)

An assessment should be made on the impact of short-lived climate pollutants and compared with those substances already regulated in EU climate change policy. Substances already regulated under the EUETS should not be duplicated under AQ policy to firstly avoid any

duplication of effort and cost and secondly to ensure that there are not conflicting obligations.

Sub-section 3.2a: Strategic approach and target year of future air pollution policy

6. Which target year should be the main focus of the revised Thematic Strategy? (Please choose one response) -single choice reply-(compulsory)	2030
6a. If the target year is 2030, should the EU set an interim target for Member States to achieve for 2025 to strengthen the achievement of the 2030 objective? (Please choose one response) -single choice reply-(compulsory)	Yes, interim targets should be set on an indicative (i.e. voluntary) basis

Sub-section 3.2b: Strategic approach and target year of future air pollution policy

7. How much additional progress should EU air pollution policy pursue in the revised Thematic Strategy? (Please choose one response) -single choice reply-(compulsory)	The level delivered by the forthcoming climate and energy framework for 2030, without additional air pollutant emission reductions
--	--

8. Please feel free to provide comments on the level of ambition: -open reply-(optional)

Following the comment on question 5, the level of ambition should match other EU policies and their synergies monitored and evaluated.

Sub-section 3.3: Setting Priorities

9. How should EU air pollution policy give priority to addressing either human health or the environment? (Please choose one response) -single choice reply-(compulsory)	Equal weight to both
--	----------------------

10. Please feel free to provide comments on setting priorities: -open reply-(optional)

Addressing environmental impacts as a priority might have a positive effect on human health and vice versa but they have to be addressed equally.

Sub-section 3.4: Choice of policy instruments

Negotiate new emission reduction commitments for 2030 under the Gothenburg Protocol which are aligned with the ambition level determined for the revised strategy. To be effective, this option would require action to ensure that EU neighbouring countries join and ratify the 2020 emission reduction targets. -single choice reply-(optional)	4
In the National Emissions Ceiling Directive, establish emission ceilings for the 2025-2030 period which are aligned with the ambition level determined for the revised strategy. -single choice reply-(optional)	3
In the Ambient Air Quality Directive, adapt the AQ limit values for the 2025-2030 period to more stringent levels corresponding to the ambition level determined for the revised strategy.	2

-single choice reply-(optional)	
In EU legislation on emission sources, set more stringent emission requirements for industrial activities, motor vehicles and other air pollution sources, where cost-effective. -single choice reply-(optional)	6
Use non-legislative methods, such as existing EU funding schemes, urban air quality programmes, research and innovation actions or awareness raising (please specify in following question). -single choice reply-(optional)	1
Other instruments (please provide comments in question 12). -single choice reply-(optional)	5

12. Which other instruments should be used? -open reply-(optional)

The introduction of a new approach based on market-based instruments in the already highly regulated area of industrial emissions would not make economic nor environmental sense. The European Commission has already recognised that proposals such as an Emission Trading Scheme for NO_x and SO₂ would create investment uncertainty and conflict with existing air quality requirements. The Commission is striving to simplify overlapping air pollution policies and the introduction of a new policy instrument would, in the case of the cement industry, be disproportionate and go against these simplification efforts. The success of the current legislation on industrial emissions, which is on the way to delivering targets, rests upon the willingness of industrial operators to invest in Europe. The legislation can be improved and this is precisely the purpose of the new IED. However, it is essential that the predictability and reliability required by investors be maintained. Throwing away the existing approach for market based instruments would not make sense.

Section 4/6: Revising the Ambient Air Quality Directive

Sub-section 4.1a: Aligning with latest scientific and technical knowledge

13. Should the indicative limit value for PM _{2.5} of 20 µg/m ³ for 2020 be made mandatory? -single choice reply-(compulsory)	No
14. Should the PM _{2.5} or other limit values in the AAQD be made more stringent to bring them closer to WHO guidance values? (Please choose one response) -single choice reply-(compulsory)	Bring AAQD limit values closer to WHO guidance values only in the future, once the EU has made further emissions reductions

Sub-section 4.1b: Aligning with latest scientific and technical knowledge (black carbon)

15. Should monitoring and regulation be introduced for black carbon/elemental carbon? (Please choose one response) -single choice reply-(compulsory)	Yes, introduce monitoring requirement
16. Should any other components of particulate matter be addressed in the AAQD? -open reply-(optional)	

Sub-section 4.1c: Aligning with latest scientific and technical knowledge (ozone)

17. Which binding limit values (if any) should the AAQD set for ozone? (Please choose one response) -single choice reply-(**compulsory**)

Don't know

Sub-section 4.2a: Management framework

18. Should any limit values be removed from the AAQD? If so, which? -open reply-(**optional**)

Limit values should not be removed.

Sub-section 4.2b: Management framework

19. Should any *other* monitoring and reporting obligations be reduced in the AAQD? If so, which? -open reply-(**optional**)

Monitoring and reporting obligations should not be reduced but Member States should be required to provide an annual monitoring report.

Sub-section 4.2c: Management framework

20. Should zone-specific plans be consolidated into coordinated national plans? (Please choose one response) -single choice reply-(**compulsory**)

Don't know

21. Should cooperation among Member States be reinforced to better address transboundary pollution flows that affect local air quality problems? (Please choose one response) -single choice reply-(**compulsory**)

Yes, cooperation should be reinforced, but in other ways (pls specify in following question).

22. Please feel free to provide comments on the options for the revision of the AAQ Directive: -open reply-(**optional**)

The European Commission should get more involved in setting up such cooperation between member states.

Section 5/6: Revising the National Emission Ceilings Directive (NECD)

Sub-section 5.1: Aligning with latest scientific and technical knowledge

23. Should national emission ceilings be adopted for black carbon/elemental carbon? (Please choose one response) -single choice reply-(**optional**)

No

24. Should national emissions ceilings be introduced for other new pollutants? (Please provide written comments if you would like to propose ceilings for other pollutants) -open reply-(**optional**)

No, but the situation should be monitored and Member States should be required to monitor and report.

Sub-section 5.2a: Management framework

25. Which mechanisms for flexibility should be introduced into the NEC Directive management framework? (Please choose one or more responses) -multiple choices reply-(**optional**)

Allowing Member State compliance for the Directive's ceilings to be measured on the basis of a multi-year average - Allowing limited adjustments of Member State emission ceilings, under specific circumstances and after approval by the Commission - Allowing limited adjustments of Member State emission inventories for compliance check, under specific circumstances and after approval by the Commission

Sub-section 5.2b: Management framework

26. Should coordination be required between the national and local levels in respect of emissions reduction measures and local air quality management? (Please choose one response)
-single choice reply-(**compulsory**)

Yes

27. Please feel free to provide comments on the options for the revision of the NEC Directive:
-open reply-(**optional**)

A better coordination between national and local levels should be addressed and prioritized according to regional issues

Section 6/6: Addressing major air pollution sources

Sub-section 6.1: Road transport

Introduce with minimum delay the new test procedure to ensure that real world emissions of Euro 6 light duty diesel vehicles are as close as possible to the type approval limit values
-single choice reply-(**optional**)

2

Strengthen EU-wide requirements for in-service compliance with emissions standards, to ensure that light-duty vehicles on European roads continue to produce low emissions over their lifetime -single choice reply-(**optional**)

3

Develop a new, more stringent standard to be mandatory for motor vehicles after 2020
-single choice reply-(**optional**)

6

Develop a supplementary more stringent standard, not mandatory, to be used by national and local governments in a harmonised way wherever air quality exceeds EU standards (e.g. to establish low emission zones), or to establish incentives at MS level to increase penetration of cleaner vehicles
-single choice reply-(**optional**)

5

Introduce standards to retrofit existing heavy duty vehicles (e.g. trucks, buses) to reduce their air pollution emissions -single choice reply-(**optional**)

Introduce a mandatory road charging scheme for heavy duty vehicles that incorporates air pollutant emissions ("eurovignette directive")
-single choice reply-(**optional**)

7

Develop additional test-cycle components specific to the driving patterns of special purpose urban vehicles (e.g. buses and refuse collection vehicles), to ensure that pollution control technologies operate effectively under real urban driving conditions

8

-single choice reply-(optional)	
Other (please provide comments in question 29) -single choice reply-(optional)	4
No additional measures should be introduced -single choice reply-(optional)	1
Don't know -single choice reply-(optional)	

29. Please feel free to comment on your answers regarding regulation of road transport emissions: -open reply-(optional)

Sub-section 6.2: Off-road transport and non-road machinery

Extend the scope of application of current Stage IV NRMM standards to additional power classes and applications, including stationary applications -single choice reply-(optional)	5
Introduce as soon as possible a more stringent Stage V standard for non-road machinery, aligned with the limit values of the most stringent Euro VI regulation for heavy duty road vehicles, which would further reduce especially PM emissions. -single choice reply-(optional)	4
Ensure that approval emission tests reflect the machinery's emissions in real world circumstances -single choice reply-(optional)	3
Ensure that there are incentives for retrofitting and/or replacing older inland waterway vessels' engines by newer and cleaner ones -single choice reply-(optional)	2
Other (please provide comments in question 31) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	1
Don't know -single choice reply-(optional)	

31. Please feel free to comment on your answers regarding regulation of emissions from off-road transport and non-road machinery: -open reply-(optional)

The extension of the EU Thematic Strategy on Air Pollution and related policies to include Off-road and non-road machinery could have serious implications for the mineral products industry, particularly asphalt and quarrying, in Europe from the potential cost of equipment replacement and testing regimes that may be implemented. These implications need to be analysed in detail before any proposals are considered for implementation.

Sub-section 6.3: Agricultural sector

Set tighter emission ceilings for ammonia for 2020 and 2030 in the NEC Directive, leaving flexibility to Member States on how these ceilings can best be reached -single choice reply-(optional)	
---	--

Where cost effective, introduce new or revise existing EU legislation to establish EU-wide specific rules for e.g. improved manure storage, management and spreading techniques -single choice reply-(optional)	
Promote good practices in manure management and manure spreading in Member States through support from the Rural Development Fund -single choice reply-(optional)	
Introduce measures to ban or restrict the burning of agricultural waste -single choice reply-(optional)	
Other (please provide comments in question 33) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	
Don't know -single choice reply-(optional)	1

33. Please feel free to comment on your answers regarding regulation of emissions from the agricultural sector: -open reply-(optional)

Industry has several policies in place to reduce emissions. It is important that emissions from transport and agriculture, as well as from households - sectors whose emissions have kept growing - are also addressed.

Sub-section 6.4: Small/medium combustion sector

34. Which additional measures should be taken to address air emissions from small and medium combustion installations (below 50 MW)? (Please choose one or more responses) -multiple choices reply-(optional)	No additional measures should be introduced
---	---

35. Please feel free to comment on your answers regarding regulation of emissions from the small/medium combustion sector: -open reply-(optional)

Sub-section 6.5: Shipping sector

36. Which additional measures should be taken to address air emissions from the shipping sector? (Please choose one or more responses) -multiple choices reply-(optional)	Promote the extension of the Sulphur Emission Control Areas to additional EU sea areas such as the Irish Sea, the Gulf of Biscay, the Mediterranean and/or the Black Sea provided that such a measure is cost-effective. - Promote the designation of NOx Emission Control Areas in EU regional seas where cost-effective (those listed above and/or the Baltic and the North Sea including the English Channel) provided that such a measure is cost-effective.
---	--

37. Please feel free to comment on your answers regarding regulation of emissions from the shipping sector: -open reply-(optional)

Promoting the extension of SECA's and designating NECA's seems the most cost effective option. Suggestions such as retrofitting all vessels with NOx abatement and requiring continuous monitoring would be exceedingly costly.

Final comments

38. Please feel free to provide any further comments related to the revision of the Thematic Strategy on Air Pollution: -open reply-(optional)

No policy should go beyond the application of best available techniques as defined in the IED. The review of Europe's air policies should go hand in hand with the negotiations in place through the UNECE Convention on Long-range Transboundary Air Pollution, thus allowing for the setting of targets within the context of an international level-playing field and the prioritisation of actions on the basis of cost effectiveness. In order to achieve new long-term targets it is also essential that the review of EU Air Policy ensures the participation of all sectors to combat air pollution.