



## Joint open letter on the National Emission Ceilings Directive

*The European Parliament and Council are currently discussing the Commission's proposal for the revision of the 2003 National Emission Ceiling (NEC) Directive. This directive can steer national policies to reduce air pollution in the EU.*

*European cities are fully committed to improving air quality. However, many factors affecting air pollution are beyond our control, and many city authorities are struggling to meet the local air quality requirements of the Ambient Air Quality Directive (2008/50/EC). **POLIS and EUROCITIES fully support the revision of the NEC directive**, as it is essential for improving local air quality within the limit values of the Ambient Air Quality (AAQ) Directive (2008/50/EC).*

The new targets should lead to an effective reduction of pollutant emissions. EUROCITIES and POLIS therefore support **binding reduction targets to be applied already by 2025**, so that real progress can be made towards improving urban air quality. The European Commission's impact assessment report<sup>1</sup> concluded that binding reduction targets for 2025 can be achieved cost-effectively. This has been confirmed by the impact assessment carried out for the European Parliament, which examines the interaction between the proposed NEC Directive and the EU 2030 climate and energy targets. We believe that the EU **should adopt binding and more ambitious targets, as identified in the EP impact assessment for 2025 and 2030<sup>2</sup>**, in particular by 2025:

- 51% reduction in particulate matter PM<sub>2.5</sub>, compared to 37% in the Commission proposal
- 66% reduction in nitrogen oxides (NO<sub>x</sub>), compared to 56% in the Commission proposal
- 29% reduction in ammonia (NH<sub>3</sub>), compared to 17% in the Commission proposal

These targets would better align the timeline and level of ambition of the National Emission Ceilings Directive with its local counterpart, the Ambient Air Quality Directive. Consequently, cities and member states could better coordinate local air quality strategies and national air pollution control programmes. To fully reap the benefits of this multilevel approach, member states should **consult local and regional authorities, and in particular, properly involve cities with over 250,000 inhabitants in drafting national air control programmes** (article 6 (5)).

<sup>1</sup> SWD(2013)531, <http://bit.ly/1Kx7wZg>, p. 70

<sup>2</sup> PE 528.802, <http://bit.ly/1KZcimw>, pp. 50-54 (2025), pp. 43-47 (for 2030)



We are committed to continuing the exchange of **good practices on air quality management within our networks, and we would welcome further exchanges between local, regional and national authorities, supported by the EU. These exchanges could address policy and planning at all levels**, including sustainable urban mobility planning measures such as encouraging walking and cycling, improving public transport, better traffic management, restricting access for the most polluting vehicles, and using cleaner vehicles in public fleets.

The revision of the NEC Directive should go along with **better coordination of air policy with other European policies**, such as under the Energy Union. Notably, **energy solutions should be assessed not only on their potential to reduce energy demand and greenhouse gas emissions, but also on their impact on air quality**, in order to avoid conflicting results. For instance, the 'dieselisation' of Europe's car fleet has improved energy efficiency, but has also aggravated air pollution, especially in cities. The EU should avoid similar problems in the future, such as when it comes to biomass burning. The implementation of other relevant directives, notably the alternative fuels infrastructure directive<sup>3</sup> or the clean vehicles directive<sup>4</sup>, should take into account air quality standards and measures in a more balanced way. An ambitious NEC Directive can contribute to these efforts: binding and ambitious national emissions ceilings will help ensure that member states put into place more sustainable transport policies and coherent frameworks, as well as plans and initiatives that promote the rollout of alternatively fuelled vehicles and their charging infrastructure.

In addition to setting overall emission ceilings, emissions must be reduced directly at their source. Currently, real-world emissions from cars on the roads are often much higher – up to seven times - than those indicated by the official type-approval test results. The Real-world Driving Emissions (RDE) **test procedure for the Euro 6 emission standard**, currently being discussed by the Technical Committee on Motor Vehicles (TCMV), **must be finalised swiftly**. The new test protocol should be effective and fully operational by 2017 at the latest. We support amendments to the NEC Directive which call for a quick introduction of the RDE procedure and verifying that vehicles meet emission standards throughout their life span. Many European cities have implemented low emission zones but these schemes only work with reliable emission standards.

Air pollution is the most important environmental health problem in the EU<sup>5</sup>, costing our economies around US\$1.6 trillion (€1.4 trillion) every year<sup>6</sup>. An ambitious NEC Directive and effective Euro emission standards are essential to achieving local air quality within the limit values of the air quality directive.

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<sup>3</sup> Directive 2014/94/EU - <http://bit.ly/1zBw7Ln>

<sup>4</sup> Directive 2009/33/EC - <http://bit.ly/1PoY2QH>

<sup>5</sup> WHO report - <http://bit.ly/1QJvcNx>

<sup>6</sup> WHO report - <http://bit.ly/1HYqn17>





We trust that the point of view of cities and regions as outlined above will be a useful contribution to the discussion, and we remain available to provide any further information you may need.

Yours sincerely,

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POLIS Secretary General

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**About POLIS:**

Polis is a network of around 65 European cities and regions working together to develop innovative technologies and policies for local transport. Polis works with transport experts and decision makers at local and regional level.

The network's aim is to improve local transport through integrated strategies that address the economic, social and environmental dimensions of urban mobility. To this end, Polis supports the exchange of experiences and the transfer of knowledge between its members and also facilitates the dialogue with other stakeholders of the sector such as industry, research centres and universities, and NGOs.

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**About EURO CITIES:**

EUROCITIES is the network of major European cities. Our members are the elected local and municipal governments of major European cities, bringing together the local governments of over 130 of Europe's largest cities and 40 partner cities that, between them, govern 130 million citizens across 35 countries.

Its objective is to reinforce the important role that local governments should play in a multilevel governance structure. We aim to shape the opinions of Brussels stakeholders and ultimately shift the focus of EU legislation in a way which allows city governments to tackle strategic challenges at local level.

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