**To:**
Executive Vice-President of the European Commission, Mr. F. Timmermans
EU Commissioner for Environment, Oceans and Fisheries, Mr. V. Sinkevičius
EU Commissioner for Health and Food Safety, Ms. S. Kyriakides

**Copy to:**
EU Commissioner for Transport, Ms. A. Vălean
EU Commissioner for Energy, Ms. K. Simson
EU Commissioner for the Internal Market, Mr. T. Breton

20th October 2022

Honourable Executive Vice-President Mr. Timmermans,
Honourable Commissioners,

We, an alliance of NGOs and civil society groups working on clean urban transport, are writing to express our strong support for the upcoming revision of the EU's Ambient Air Quality Directive[1] and call on you to seize this once-in-a-generation opportunity to reaffirm Europe's leadership in clean air policies. This specifically means fully aligning the EU limit values with the science-based global air quality guidelines of the World Health Organization (WHO)[2] as well as strengthening the requirements for consistent air pollution monitoring in order to tackle unacceptable levels of premature deaths, illnesses, equity impacts as well as climate damage caused by air pollution.

The scientific evidence leaves no doubt about the harmful effects of air pollution. More than 96% of Europe's urban population is exposed to pollution levels exceeding the WHO guidelines[3], which caused more than 300,000 premature deaths in the EU in 2019[4] as well as a wide range of illnesses such as heart disease, stroke, chronic obstructive pulmonary disease, lung cancer and acute respiratory infections.[5] Furthermore, air pollution has serious equity impacts as the most vulnerable groups such as children, the elderly and low-income households are both more exposed and more susceptible to it.[6] Finally, climate change and air pollution are closely interlinked as greenhouse gases and air pollutants are often emitted from common sources and interact in the air.[7] Black carbon and ground-level ozone, for example, damage both climate and health.[8]

---

[1] Directive 2008/50/EC on Ambient Air Quality, abbreviated as AAQD.
[2] World Health Organization. (2021). *WHO global air quality guidelines*. Link
[3] European Environmental Agency. (2022). *Europe's air quality status 2022*. Link
[4] European Environment Agency. (2021). *Health impacts of air pollution in Europe*, 2021. Link
[5] World Health Organization. (undated). *Exposure & health impacts of air pollution*. Link
[6] UNICEF. (2022). *Childhood air pollution exposure - key messages*. Link; European Environment Agency. (2019). *More action needed to protect Europe's most vulnerable citizens from air pollution, noise and extreme temperatures*. Link
[7] United Nations Environment Programme. (2019). *Air pollution and climate change: two sides of the same coin*. Link
[8] C40 Knowledge Hub. (2019). *Win-Win: Why cities should tackle climate change and air pollution together*. Link

The benefits of decisive action are equally clear: premature deaths caused by fine particulate matter ($PM_{2.5}$) could have already been reduced by at least 72% compared to 2005 levels had the current WHO air quality guideline of 5 micrograms per $m^3$ been attained across the EU in 2019.[9] Substantial cost savings can also be achieved for our cities and societies, given that the costs of premature deaths, medical treatment, lost working days and other health costs in Europe amount to an average of over €385 million per city and year (more than €1,250 per city resident and year).[10] The economic gains from the air quality-related health benefits of strong climate action, in line with the 1.5°C target, are up to 145% higher than the cost of the interventions needed to achieve it.[11]

Given the damage caused by air pollution and the benefits of decisive action, it is no surprise that more than two in three Europeans think that the European Union should propose additional measures to address air quality-related problems according to the EU's official Eurobarometer survey.[12] The European Union cannot ignore the gravity of the problem that air pollution poses and should do everything in its power to address this public health and climate crisis.

We therefore call on the European Commission to put forward a proposal for the revision of the Ambient Air Quality Directives that delivers the following:

1. **Fully align EU limit values for pollutants with the global air quality guidelines of the World Health Organization and require compliance by 2030 at the latest.**

   The EU's current limit values for air pollution are out of touch with the science-based WHO guidelines.[13] The EU annual limit value for particulate matter ($PM_{2.5}$), for example, is five times higher than the WHO guideline (25 vs. 5 micrograms per $m^3$), and the nitrogen dioxide ($NO_2$) limit four times higher (40 vs. 10 micrograms per $m^3$). The European Commission's 'Zero Pollution Action Plan' only refers to aligning EU limits 'more closely'[14] with the WHO guidelines, which would result in tolerating dangerous levels of air pollution. Cities and citizens need clear, understandable and fully science-based limit values to take effective action and communicate necessary changes.

---

[9] European Environmental Agency. (2021). *Health impacts of air pollution in Europe, 2021*. Link
[10] CE Delft. (2020). *Health costs of air pollution in European cities and the linkage with transport*. Link
[11] C40 Knowledge Hub. (2019). *Win-Win: Why cities should tackle climate change and air pollution together*. Link
[12] European Commission. (2019). *New Eurobarometer survey shows: The majority of Europeans think the EU should propose additional measures to address air quality problems*. Link
[13] World Health Organization. (2021). *WHO global air quality guidelines*. Link
[14] European Commission. (2021). *EU Action Plan: Towards Zero Pollution for Air, Water and Soil'* Link

2. **Step up requirements for reliable, consistent air quality monitoring**

   The EU is a global leader in air quality monitoring with more than 4,000 monitoring stations in operation, but shortcomings remain according to the European Commission's fitness check of the Ambient Air Quality Directive.[15] These hamper the reliability, consistency and usefulness of official monitoring data, for example when the number and siting of monitoring stations are not consistent across cities. The revised Ambient Air Quality Directive should therefore specify more clearly the minimum requirements for monitoring stations. This means setting separate requirements for the number of $PM_{2.5}$ and $PM_{10}$ monitors and agglomeration-specific instead of nation-wide minimum numbers of monitoring stations, as well as providing more detailed definitions of macro and micro siting requirements (e.g. for "traffic", "industrial" and "background" stations).

The mayors of 13 European cities have already made an ambitious commitment to improve air quality and public health with the signing of the C40 Clean Air Cities Accelerator, committing to put in place emissions reductions on sources within their city and their control.[16]

As civil society groups we are strongly committed to making our contribution to fighting air pollution. But our success and the health of 447 million EU citizens critically depends on decisive European action. The time has come for this legislation to be updated to be fit for dealing with the public health emergency caused by air pollution.

Yours sincerely,

*Mark Watts - Executive Director, C40*
*Barbara Stoll - Director, Clean Cities Campaign*
*Jill Warren - CEO, European Cyclists' Federation*
*Anne Stauffer - Deputy Director, Health and Environment Alliance*
*William Todts - Executive Director, Transport & Environment*

C40 CITIES CLIMATE LEADERSHIP GROUP
CleanCities
ECF EUROPEAN CYCLISTS' FEDERATION
HEAL HEALTH AND ENVIRONMENT ALLIANCE
TRANSPORT & ENVIRONMENT

[15] European Commission. (2019). *Executive Summary of the Fitness check of the Ambient Air Quality Directives*. Link
[16] C40 Clean Air Accelerator (2019): *Cities unite to clean the air their citizens breathe, protecting the health of millions*. Link