

# EEB's Guidance and Sample Answers to the Questionnaire of the public consultation of the Ambient Air Quality Directives (AAQD) revision

A revision of the AAQD that strengthens EU air quality standards is an important step to ensure that people's right to clean air is respected. The new laws must reflect the latest scientific evidence on the health and environmental impacts of air pollution, and support actions to cut pollution at source. EEBs suggested answers in this guide as well as the Response document highlight the demands needed and the reasons behind them.

You can see EEBs sample answers below, you can copy the text (and of course adapt to your own experience, vision and country specific situation). All the guide's open answer suggestions are within the maximum character limits and highlighted in yellow. Do not miss the non-obligatory Specialised questions section (Part 3) which you choose in question 20.

The public consultation is open until the 16<sup>th</sup> of December 2021. Take part by clicking on [this link](#) and then click on the yellow "respond to 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

## Part 1: About you

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## 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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on my health or the health of my family members	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on businesses and small/medium enterprises (including lost work days due to air pollution)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impacts on agriculture and crops (including on plant growth and animal health)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on natural environment (including pollution					

of water bodies, or reduced biodiversity)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impacts on buildings and infrastructure (including corrosion or discoloration of buildings)	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 (NH3)
  - ☒ Methane (CH4)
  - ☒ 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

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local / city	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If "other", please specify:

100 character(s) maximum

## 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

The revision must include full alignment with the revised WHO air quality guidelines for protection of health and with the Air Convention's scientifically based critical levels for protection of vegetation. Air quality standards in the form of binding limit values have been and will continue to be a key driver for reducing air pollution concentrations. The urgency to reduce health and environmental damage due to air pollution means that the revision must set a very ambitious timeline for achieving the new air quality standards for 2030. The AAQD should also commit to zero pollution ambition (i.e. no health risks) by 2040, going beyond WHO. A process for automatic adjustment of AQ standards considering technical progress and new scientific evidence should be part of the revised AAQD.

## 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

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

Binding limit values are key for improving air quality, other air quality standards, should only be complements. Standards aligned with 2021 WHO guidelines are key to reduce air pollution to the minimum, in line with the Zero Pollution ambition. Improvement of the legislative framework for delivery- as well as remedial plans to are needed for early enforcement interventions instead of until a missed compliance deadline. Provisions on access to justice, on penalties and on harmonise rules on damage compensation, should be included. As well as a public air quality information system for up-to-date data and harmonised information and alert thresholds for all AAQD air pollutants. The IA should fully consider that socio-economic benefits from reducing air pollution are much higher the costs.

### 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

Increase the minimum number of PM2.5 stations. Require monitoring stations for ultra-fine particles, black carbon, and ammonia. Ensure continuity of measurements for all pollutants. Strengthen the siting criteria and establish a system to assess the functioning of the stations. Provide clearer requirements for the network design and site locations. Require a more regular use of models and indicative measurements to support information from fixed sampling points. Strengthen and clarify the requirements in Annex XV regarding minimum content of air quality plans and provide a comprehensive and up-to-date checklist of air pollution abatement measures. Set out clearer requirements for air quality plans, incl. timeframes, public participation, and information on technical assessment and forecast

### 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Establish legally enforceable limit values for all air pollutants	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 WHO Air Quality Guidelines)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

EU standards must follow best available scientific knowledge and advice

Please explain your answer, if you wish

100 characters minimum






	100 characters minimum
a) Ensure achievement of existing EU air quality standards	Already long overdue. A must for minimum protection of health & environment
b) Align EU air quality standards with World Health Organization recommendations	EU standards must follow best available scientific knowledge and advice
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	Useful but average exposure only an addition to binding limit values everywhere.
d) Mandate that all air quality standards are met everywhere (i.e. including at ‘pollution hotspots’ such as roadside or downwind from industry)	Ensure that every citizen has the right to clean air
e) Establish legally enforceable limit values for all air pollutants	Ensure that every citizen has the right to clean air
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)	WHO AQG must be mandatory limit values now as soon as possible, not only long term aspirations.
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					
b) Further define the different types of air quality standards and the actions their exceedances would trigger					
c) Expand requirements for action by national / regional / local authorities in case of exceedances					
d) Establish additional provisions for air quality plans, including on who to involve in their preparation					
e) Expand the provision on penalties related to air pollution					
f) Add provisions for access to justice and for compensation					

for health damage from air pollution					
g) Expand the requirements on the provision of information (e.g. on health impacts)					

Please explain your answer, if you wish

100 characters minimum

	100 characters minimum
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress	EU standards must follow best available scientific knowledge and the new directive must enable this.
b) Further define the different types of air quality standards and the actions their exceedances would trigger	Binding limit values are key, other are complements.Target/alert exceedance must trigger actions.
c) Expand requirements for action by national / regional / local authorities in case of exceedances	Expanded/detailed lists of actions at various levels of governance enable improved implementation.
d) Establish additional provisions for air quality plans, including on who to involve in their preparation	Plans coherence and content need to improve, by clear responsibilities and wide participation early.
e) Expand the provision on penalties related to air pollution	The AQD's effectiveness depend on fast and firm action (incl. penalties) to address non-compliance.
f) Add provisions for access to justice and for compensation for health damage from air pollution	Key to improve/ensure limit value compliance, citizens involvement and air pollution awareness.
g) Expand the requirements on the provision of information (e.g. on health impacts)	Public awareness must increase to improve compliance and promote “secondary” protective measures.





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					
b) Expand monitoring requirements to broader set of harmful air pollutants					
c) Enable enhanced use of modelling for air quality assessment					
d) Further specify minimum elements required of air quality plans (e. g. cost-benefit analysis, projections, etc.)					

Please explain your answer, if you wish

100 characters minimum

	100 characters minimum
a) Establish more detailed rules on the location of sampling points	Will enhance coherence, comparability, continuity, and the quality of monitoring and also compliance
b) Expand monitoring requirements to broader set of harmful air pollutants	More monitoring of NH3, UFP, BC, PN urgently needed, to include these (with limit values) in AAQD.
c) Enable enhanced use of modelling for air quality assessment	Modelling can be cost-effective means of assessing air pollution, a useful complement to monitoring.
d) Further specify minimum elements required of air quality plans (e.g. cost-benefit analysis, projections, etc.)	Will enhance coherence, comparability, continuity, and the quality of monitoring and also compliance
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					
b) Align EU air quality standards with World Health Organization recommendations					
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)					
d) Mandate that all air quality standards are met everywhere (i.e. including at 'pollution hotspots' such as roadside or downwind from industry)					
e) Establish legally enforceable limit values for all air pollutants					
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. based on the average exposure of the general population)					

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

100 characters minimum

















	100 characters minimum
a) Ensure achievement of existing EU air quality standards	The socio-economic benefits of air pollution reductions are higher than the implementation costs.
b) Align EU air quality standards with World Health Organization recommendations	EU standards must follow best available scientific knowledge and advice and AAQD should enable this.
c) Mandate that all air quality standards are met in general (i.e. based on the average exposure of the general population)	Ave. expo. reduction should only be complementary to binding limit values everywhere.
d) Mandate that all air quality standards are met everywhere (i.e. including at ‘pollution hotspots’ such as roadside or downwind from industry)	UN Human Rights Council recognised access to a clean and healthy environment as a fundamental right.
e) Establish legally enforceable limit values for all air pollutants	Binding limit values has proven to be more effective in reducing air pollution than other standards.
f) Set aspirational long-term objectives to meet all World Health Organization (WHO) recommendations (i.e. as per updated WHO Air Quality Guidelines)	WHO AQG must be mandatory EU limit values as soon as possible, i.e. not only aspirational long term.
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					
b) Further define the different types of air quality standards and the actions their exceedances would trigger					
c) Expand requirements for action by national / regional / local authorities in case of exceedances					
d) Establish additional provisions for air quality plans, including on who to involve in their preparation					
e) Expand the provision on penalties related to air pollution					
f) Add provisions for access to justice and for compensation for health damage from air pollution					

g) Expand the requirements on the provision of information (e.g. on health impacts)					
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Please explain your answer, if you wish















100 characters minimum

	100 characters minimum
a) Make it easier to adjust EU air quality standards to the evolving technical and scientific progress	EU standards must follow best available scientific knowledge and the new directive must enable this.
b) Further define the different types of air quality standards and the actions their exceedances would trigger	Binding limit values are key, other are complements.Target/alert exceedance must trigger actions.
c) Expand requirements for action by national / regional / local authorities in case of exceedances	Expanded/detailed lists of actions at various levels of governance enable improved implementation
d) Establish additional provisions for air quality plans, including on who to involve in their preparation	Plan’s coherence and content need to improve, by clear responsibilities and wide participation early
e) Expand the provision on penalties related to air pollution	The AAQD’s effectiveness depend on fast and firm action (incl. penalties) to address non-compliance.
f) Add provisions for access to justice and for compensation for health damage from air pollution	Key to improve/ensure limit value compliance, citizens involvement and air pollution awareness.
g) Expand the requirements on the provision of information (e.g. on health impacts)	Public awareness must increase to improve compliance and promote “secondary” protective measures.
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					
b) Expand monitoring requirements to broader set of harmful air pollutants					
c) Enable enhanced use of modelling for air quality assessment					
d) Further specify minimum elements required of air quality plans (e. g. cost-benefit analysis, projections, etc.)					

Please explain your answer, if you wish

100 characters minimum

	100 characters minimum
a) Establish more detailed rules on the location of sampling points	Will enhance coherence, comparability, continuity, quality of the monitoring, thus also compliance.
b) Expand monitoring requirements to broader set of harmful air pollutants	More monitoring of NH3, UFP, BC, PN urgently needed, to include these (with limit values) in AAQD
c) Enable enhanced use of modelling for air quality assessment	Modelling can be cost-effective means of assessing air pollution, a useful complement to
d) Further specify minimum elements required of air quality plans (e.g. cost-benefit analysis, projections, etc.)	Will enhance coherence, comparability, continuity, quality of the monitoring, thus also compliance.
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

In line with the Zero Pollution Ambition, full alignment with WHO AQG must be attained as soon as possible. Therefore the air quality standards in the new EU Directive must be set as mandatory (binding) EU limit values and not as aspirational long term objectives.



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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different pollutants and their sources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Areas most affected by air pollution	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>
International initiatives to tackle air pollution (including World Health Organization guidelines)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<a href="#">European legislation to tackle air pollution</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Implementation of European legislation to tackle air pollution					
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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

When assessing feasibility of compliance, the baseline scenario should include full implementation of the whole EU acquis that will contribute to lower emissions of air pollutants, NECD as well as sector policies, such as for energy (incl. domestic heating), transport (incl. Euro 7/VII standards) and agriculture. The IA should also account for air pollution benefits from the most recent climate change policies. The MTFR scenario should not be limited solely to technical measures but also e.g. promotion of energy efficiency, dietary change, faster replacing of combustion installations, cleaner transport systems, low-emission zones.

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

- Regrading critical levels for vegetation, see: "Manual for Modelling and Mapping Critical Loads & Levels" (<https://www.umweltbundesamt.de/en/manual-for-modelling-mapping-critical-loads-levels>) (<https://www.umweltbundesamt.de/sites/default/files/medien/4292/dokumente/ch3-mapman-2017-10.pdf>).
- Long term exposure to low level air pollution and mortality in eight European cohorts within the ELAPSE project doi: <https://doi.org/10.1136/bmj.n1904>

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

Yes, a response document by the European Environmental Bureau is attached.