



## **AECC Response to the European Commission consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies**

AECC\* welcomes the European Commission's initiative to revise the EU Thematic Strategy on Air Pollution and related policies.

The AECC contribution to the on-line consultation is provided in Annex.

Should you need more information, you can contact AECC at [info@aecc.eu](mailto:info@aecc.eu) or by phone at +32 2 706 8160.

*\*AECC is an international non-profit scientific association of European companies engaged in the development, production and testing of catalyst and filter based technologies for vehicle and engine emissions control. This includes the research, development, testing and manufacture of autocatalysts, ceramic and metallic substrates and speciality materials incorporated into the catalytic converter and filter and catalyst based technologies to control engine emissions. Members' technology is incorporated in the exhaust emission control systems on all new cars and an increasing number of commercial vehicles, buses, non-road mobile machinery and motorcycles in Europe.*

*More information on AECC can be found at [www.aecc.eu](http://www.aecc.eu). Information on emissions control retrofit for existing heavy-duty vehicles and non-road machinery can also be found at [www.dieselretrofit.eu](http://www.dieselretrofit.eu).*

*AECC's members are: BASF Catalysts Germany GmbH, Germany; Corning GmbH, Germany; Emitec Gesellschaft für Emissionstechnologie mbH, Germany; Ibsiden Deutschland GmbH, Germany; Johnson Matthey PLC, United Kingdom; NGK Europe GmbH, Germany; Solvay, France and Umicore AG & Co. KG, Germany.*

# 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-( <b>compulsory</b> )	On behalf of an organisation
A1. What type of organisation do you represent? -single choice reply-( <b>compulsory</b> )	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-( <b>optional</b> )	Emissions control of mobile sources
A2. Does your organisation work mainly on an EU-wide basis or in a single country? -single choice reply-( <b>compulsory</b> )	EU-wide
A3. Please indicate the country where your organisation is located: -single choice reply-( <b>compulsory</b> )	Belgium
A4. Please indicate the name of your organisation: -open reply-( <b>compulsory</b> )	Association for Emissions Control by Catalyst (AECC)
A5. Please indicate your name and title: -open reply-( <b>compulsory</b> )	Dirk Bosteels, Executive Director
B. Do you now work on air pollution issues, or have you done so in the past? -single choice reply-( <b>compulsory</b> )	Yes, air pollution has been the main focus of my professional work
D. Please feel free to provide any further details regarding your answers to the introductory questions: -open reply-( <b>optional</b> )	
Transparency register number: 78711786419-61	
<b>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)</b> -single choice reply-( <b>compulsory</b> )	You can publish this contribution as it is.
<b>Section 2/6: Ensuring compliance with EU air quality requirements and coherence with international commitments in the short term</b>	
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-( <b>compulsory</b> )	Strengthening emissions controls: for example more stringent emissions ceilings or source controls that support the attainment of air quality limit values

<p>1c. Which options should be considered to set more stringent obligations on air pollution emissions? (Please choose one response) -single choice reply-(<b>compulsory</b>)</p>	<p>Set more stringent emission source controls at an EU level (e.g. on combustion plants, motor vehicles and other sources), focusing on the sectors where measures to reduce emissions will be most cost-effective in terms of improving air quality</p>
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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**)

Legislation on exhaust emissions from Non-Road Mobile Machinery is lagging behind on-road requirements. As a consequence, in order to generate improvement in ambient air quality and in occupational health protection, the rapid definition of Stage V emissions limits is desirable, aligning with on-road Euro VI, especially in terms of PM mass and number limits.

## 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

<p>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-(<b>compulsory</b>)</p>	<p>It should maximise the synergies between the policies, and set out additional measures to reduce air pollutant emissions and improvements to air quality</p>
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<p>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-(<b>compulsory</b>)</p>	<p>Yes</p>
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<p>4a. Should specific complementary action be pursued to curb black carbon emissions? (Please choose one response) -single choice reply-(<b>optional</b>)</p>	<p>Yes (please describe below in question 5)</p>
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<p>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-(<b>optional</b>)</p>	<p>Yes (please describe below in question 5)</p>
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5. Please feel free to provide comments on the interaction between air pollution and climate change policies: -open reply-(**optional**)

Introducing a PM Number limit for diesel engines used in Non-Road Mobile Machinery to the level of the Heavy-duty Euro VI standard would require the use of DPF and would allow control of Black Carbon emissions. In general, promoting LNG as an alternative fuel to save on CO2 emissions, including for sea-shipping and inland navigation, should be accompanied with requirements on methane emissions which are much higher with LNG than with conventional fuels and have a high global warming potential that will have a non-negligible effect on the total greenhouse gas emissions.

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

<p>6. Which target year should be the main focus of the revised Thematic Strategy? (Please choose one response) -single choice reply-(<b>compulsory</b>)</p>	<p>2025</p>
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## 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-( <b>compulsory</b> )	Substantial progress beyond the climate and energy framework, towards the maximum achievable pollution reduction
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8. Please feel free to provide comments on the level of ambition: -open reply-(**optional**)

## 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-( <b>compulsory</b> )	Equal weight to both
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10. Please feel free to provide comments on setting priorities: -open reply-(**optional**)

## 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-( <b>optional</b> )	
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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-( <b>optional</b> )	
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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. -single choice reply-( <b>optional</b> )	
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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-( <b>optional</b> )	1
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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-( <b>optional</b> )	2
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Other instruments (please provide comments in question 12).	3
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-single choice reply-(optional)

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

Instruments such as national incentives to promote early introduction of Euro 6/VI vehicles and the retrofit of older Heavy-duty vehicles and Non-Road Mobile machinery would benefit the environment.

## 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<sub>2.5</sub> of 20 µg/m<sup>3</sup> for 2020 be made mandatory? -single choice reply-(compulsory)

Yes

14. Should the PM<sub>2.5</sub> 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)

Don't know

### 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)

Don't know

16. Should any other components of particulate matter be addressed in the AAQD? -open reply-(optional)

Introducing Particulate Matter Number limits can allow controlling Black Carbon emissions at source.

### 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)

No removal is desirable.

### 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)

### 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

Don't know

be reinforced to better address transboundary pollution flows that affect local air quality problems? (Please choose one response) -single choice reply-(compulsory)

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

## 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)

Don't know

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)

### 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)

No flexibility mechanisms should be introduced

### 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)

Don't know

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

## 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)	1
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)	6
Introduce standards to retrofit existing heavy duty vehicles (e.g. trucks, buses) to reduce their air pollution emissions -single choice reply-(optional)	4
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 -single choice reply-(optional)	5
Other (please provide comments in question 29) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	
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)

An early definition of Euro 7/VII stages for post-2020 implementation would be beneficial to the industry in giving sufficient leadtime. Therefore, it should be finalized as soon as possible.

## 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)	2
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)	1
Ensure that approval emission tests reflect the machinery's emissions in real world	3

circumstances -single choice reply-(optional)	
Ensure that there are incentives for retrofitting and/or replacing older inland waterway vessels' engines by newer and cleaner ones -single choice reply-(optional)	4
Other (please provide comments in question 31) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	
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)	
It is desirable that the Stage V standard is developed along the following lines: • It should be recognised that emissions control technologies are readily available to meet future NRMM requirements that align with on-road Euro VI emissions legislation. • A single PM Number limit should be defined for all NRMM engines above 19 kW. The Heavy-duty PMP (Particulate Measurement Program) protocols developed by UNECE can readily be used to measure PM Mass and Number emissions of non-road engines. • The future Stage V legislation should cover all NRMM CI and SI engines including the smaller (<37 kW) and the larger ones (>560 kW) with the outlook of simplifying legislation by reducing the number of engine power bands and harmonizing their emissions requirements. • There should be fuel-neutrality in terms of emissions limits. • There should be identical emissions limits and introduction timing for constant speed and variable speed engines. • The future Stage V should apply to all NRMM engines and machinery categories without exemption. • Given today's availability of technologies, Stage V should be published as early as possible to give sufficient lead-time to industry.	
<b>Sub-section 6.3: Agricultural sector</b>	
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)	1
No additional measures should be introduced -single choice reply-(optional)	
Don't know -single choice reply-(optional)	
33. Please feel free to comment on your answers regarding regulation of emissions from the agricultural sector: -open reply-	

(optional)

Agricultural tractor emissions regulations should continue to mirror those for Non-Road Mobile Machinery (i.e. introduction of Stage V).

## 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)

Regulate combustion installations above the Ecodesign capacity threshold but below the 50MW threshold set in the Industrial Emissions Directive (IED)

## Sub-section 6.4: Small/medium combustion sector (continued)

34a. Which measures should be introduced to control emissions from combustion installations above the Ecodesign threshold but below 50 MW? (Please choose one or more responses)

-multiple choices reply-(optional)

Product standards, applicable for new installations only - EU-wide emission limit values or standards which are only mandatory in zones where air quality issues exist

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. - Introduce requirements for PM emission controls in EU regional seas where cost-effective - Aim for a reduction of total NOx emissions from shipping by retrofitting all vessels with NOx abatement equipment. - Require continuous monitoring of the emissions of sulphur dioxide, NOx, particulate matter (fine dust) as it is practised on many industrial installations on land.

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

## 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)

AECC is committed to support initiatives to reduce emissions from mobile sources further and AECC will continue to work with all legislative stakeholders on this important subject. All AECC technical publications on the control of emissions from mobile sources are available at [www.aecc.eu/en/Publications/Publications.html](http://www.aecc.eu/en/Publications/Publications.html).