

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

CPME response to the public consultation on the evaluation of the National Emission Reduction Commitments Directive (NECD)

On 26 November 2024, the CPME Board adopted the 'CPME response to the public consultation on the evaluation of the National Emission Reduction Commitments Directive (NECD)' (CPME 2024/145).

Open public consultation on the evaluation of the National Emission Reduction Commitments Directive

Fields marked with * are mandatory.

Introduction

This public consultation is part of the evaluation of the [National Emission Reduction Commitments \(NEC\) Directive](#) (2016/2284/EU) undertaken by the European Commission. This Directive sets national emission reduction commitments for the Member States' anthropogenic emissions of nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), sulphur dioxide (SO₂), ammonia (NH₃) and fine particulate matter (PM_{2.5}) into air. These pollutants worsen air quality, leading to significant negative impacts on human health and the environment. For example, these pollutants are linked to asthma, heart disease and stroke; they damage vegetation and ecosystems and affect water and soil quality, thus also our crops.

The Directive requires Member States to develop and implement national air pollution control programmes (NAPCP), and mandates monitoring and reporting of the pollutants' emissions and their impacts. The Commission is evaluating the Directive to understand whether it is effective, efficient, relevant, whether it is coherent with other EU policy and provides EU added value. This fulfils the commitment taken in Article 13 of the Directive.

This consultation aims to collect your views on:

- whether and how the NEC Directive has contributed to reduction in emissions of the five air pollutants (SO₂, NO_x, NMVOC, NH₃, PM_{2.5}) in the EU;
- whether the provisions of the NEC Directive continue to be relevant, effective, efficient, and coherent with other EU policies, as well as whether the Directive provides added value beyond national or regional action alone.

Your responses, along with those from other citizens and stakeholders, will be considered in the evaluation. Some questions require more in-depth knowledge of the Directive's provisions, and you are welcome to answer only some of the questions included, depending on how familiar you are with the topic.

Responses can be provided in any EU official language.

It should take about 30 minutes to complete this questionnaire and you may pause and save your responses at any time and continue later. Once you have submitted your answers, you can download a

copy of your completed responses.

An online consultation of stakeholders with more technical knowledge on the topic is being launched in parallel to this consultation. Should you be interested to participate, [please follow this link](#) for information on the targeted stakeholder consultation.

Background and wider context

Air pollution is the greatest environmental cause of premature mortality, cardiovascular diseases and respiratory conditions, and it is among the main reasons for the loss of biodiversity. The EU has been addressing air pollution since the 1970s, developing various instruments to improve air quality and protect ecosystems.

The NEC Directive is one of the three pillars of EU clean air policy. It implements the [Gothenburg Protocol](#), to which all EU Member States and the EU itself are signatories, and also sets more ambitious commitments for the period as from 2030.

The Directive targets five air pollutants (SO₂, NO_x, NMVOC, NH₃ and PM_{2.5}) with the aim to reduce the impact of air pollution on human health and the environment. It includes (mandatory and voluntary) reporting of the emissions of further pollutants, without requiring their reduction over time. It complements the [Ambient Air Quality Directives](#) (2008/50/EC and Directive 2004/107/EC) as well as emission standards for key sources of air pollution.

Examples of sources of the main pollutants include:

- SO₂ – fossil fuel combustion (especially coal), petrochemical refining
- NO_x – road transport, fossil fuel combustion, other transport
- NMVOC – fossil fuel combustion (road transport), solvent use
- NH₃ – fertiliser application, manure management
- PM_{2.5} – fossil fuel combustion, wood combustion, transport

The NEC Directive came into force on 31 December 2016 (replacing earlier legislation (Directive 2001/81/EC) and features:

- National commitments to reduce emissions of each pollutant for the period 2020-2029, and more ambitious reductions for 2030 and beyond, expressed as percentage of reduction relative to 2005 levels. This is a shift from the fixed emissions limits expressed in kilotonnes per year in Directive 2001/81/EU;
- A requirement for Member States to produce and regularly update National Air Pollution Control Programmes (NAPCPs), demonstrating the Policies and Measures (PaMs) by which the emission reduction commitments would be achieved, including a series of both optional and mandatory measures to control emissions from agriculture;
- Member State reporting of:
 - Air pollutant emission inventories per sector (annually)
 - Emission projections, i.e. estimates on the future evolution of emissions (every two years)

- Spatially disaggregated (i.e. per grid point) emissions inventories and large point sources (e.g. power plants) (every four years)
- Updated NAPCPs (every four years, or more frequently in specified circumstances)
- Ecosystem impacts monitoring data (sites and data on a staggered four-year cycle)

Information on compliance of Member States with emission reduction commitments is available based on the most recent emission data, reported for 2022. In 2022, 16 Member States met their respective 2020-2029 national emission reduction commitments for each of the five main air pollutants, while 11 Member States failed to do so for at least one of five main air pollutants. Specifically:

- For NH₃, nine Member States need to cut their 2022 emission levels to fulfil their 2020-2029 reduction commitments;
- For both PM_{2.5} and NO_x, two Member States need to cut their 2022 emission levels to fulfil the respective 2020-2029 reduction commitments;
- For both NMVOC and SO₂, one Member State needs to cut its 2022 emission levels to fulfil the respective 2020-2029 reduction commitment.

For more details, check the [briefing of the European Environmental Agency](#). The above situation may still change, subject to the ongoing review of Member States' inventories (as well as of flexibility applications made in accordance with Article 5 of the NEC Directive). Final compliance assessments will be available by the end of 2024 [here](#).

In May 2021, the Commission adopted the EU Action Plan "[Towards a Zero Pollution for Air, Water and Soil](#)" (COM(2021)400), referred to as the Zero Pollution Action Plan (ZPAP). It sets out EU-wide targets for 2030 (relative to 2005) to reduce the number of premature deaths caused by air pollution by 55% and by 25% the EU ecosystems where air pollution threatens biodiversity.

According to Article 13(1) of the NEC Directive, the European Commission has the obligation to review the Directive no later than 31 December 2025 with a view to safeguarding progress towards achieving its objectives since its adoption in 2016. In particular, by taking into account scientific and technical progress, and the implementation of Union climate and energy policies.

The evaluation is expected to provide evidence on whether the Directive is meeting its objectives and is still fit for purpose, in the context of the ZPAP and the Ambient Air Quality Directive and [its recent revision](#). It will also explore the potential for simplification and cost savings (including unnecessary administrative costs).

A note on Annex III Part 2 of the Directive

Some questions in the survey make reference to Annex III Part 2 of the Directive. A brief summary of this is provided below for context.

Annex III, Part 2 of the NEC Directive includes measures to reduce agricultural emissions, divided into three parts: ammonia control, fine particulate matter and black carbon reduction, and considerations for small farms. To control ammonia emissions, Member States must create an advisory code of good agricultural practice, covering nitrogen management, livestock feeding strategies, low-emission manure

techniques, and limits on ammonia emissions from mineral fertilisers, including banning urea-based fertilisers. For fine particulate matter and black carbon, Member States may ban open field burning of agricultural and forest residue, with exceptions for preventing wildfires, pest control, or biodiversity protection. Additionally, they can develop practices to improve soil structure and nutrient status through the incorporation of harvest residue and manure. Measures must also consider the impact on small and micro farms, potentially including exemptions where appropriate.

About you

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

* 1 Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* 2 I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* 5 First name

Markus

* 6 Surname

Kujawa

* 7 Email (this won't be published)

markus.kujawa@cpme.eu

* 11 Organisation name

255 character(s) maximum

The Standing Committee of European Doctors (CPME)

* 12 Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

13 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

*14 Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input checked="" type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |

- Belize
- Benin
- Bermuda
- Bhutan

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon
- Canada
- Cape Verde
- Cayman Islands

- Central African Republic
- Chad
- Chile
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- Ghana
- Gibraltar
- Greece
- Greenland

- Grenada
- Guadeloupe

- Guam

- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Guyana

- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong

- Hungary

- Iceland
- India
- Indonesia
- Iran

- Iraq

- Ireland
- Isle of Man
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- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma

- Namibia
- Nauru

- Nepal

- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- Niger

- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan

- Palau

- Palestine
- Panama
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- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Syria

- Taiwan
- Tajikistan
- Tanzania
- Thailand

- The Gambia

- Timor-Leste
- Togo

- Tokelau
- Tonga

- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu

- Uganda
- Ukraine
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- | | | | |
|--|----------------------------------|---|--|
| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* 16 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.



Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Awareness of air quality issues and the Directive

This section of the questionnaire seeks to gather information on the general awareness and level of knowledge of air quality issues due to the pollutants regulated by the NEC Directive and their evolution over time. It seeks to also gather information about knowledge of the NEC Directive and NAPCPs.

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

17 To what extent do you agree or disagree with the following statements?

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
Emissions of one or several of the pollutants NOx, NMVOCs, SO2, NH3 and PM2.5 are an issue of concern in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of one or several of these five pollutants are an issue of concern in my country/ where the organisation operates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emissions of one or several of these five pollutants are an issue in the area where I live/ where the organisation operates	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18 To what extent are you aware of and informed about:

	Highly aware of and informed	Somewhat aware of and informed	Not aware of and informed
NEC Directive's national emission reduction commitments applicable from 2020 to 2029 and from 2030 onwards?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
the reporting requirements for Member States set by the NEC Directive?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
the measures set by the National Air Pollution Control Programme (NAPCP) in your country?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
the measures set by the NAPCPs of countries other than your own?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

The following sections focus on gathering more in-depth views about the functioning of the NEC Directive. The questions are structured around the five evaluation criteria: relevance, effectiveness, efficiency, coherence, and EU added value.

Effectiveness

The questions seek to gather views on the degree to which the NEC Directive and implementation tools (e.g. reporting obligations) helped reduce emissions of the five air pollutants for which emission reduction commitments are set.

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

19 To what extent has the NEC Directive contributed to the achievement of better air quality, and a consequent reduction in risks for human health and the environment?

- Large beneficial impact
- Moderate beneficial impact
- Neutral or no impact
- Not applicable
- Don't know

20 Where emission reduction commitments have not yet been achieved in certain Member States, what do you think the reasons for this are? For conciseness your answer is limited to 450 characters.

21 To what extent have the following requirements in the NEC Directive helped achieve the Directive’s objectives?

	Greatly helped	Somewhat helped	Neutral	Somewhat hindered	Greatly hindered	Don't know
Definition of national emission reduction commitments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development and submission of NAPCPs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for transboundary consultations between Member States as part of NAPCP development	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agricultural measures in Annex III part 2 of the Directive (see details in Introductory Section)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Submission of emission inventories	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Submission of projections of emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ecosystem monitoring and reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

22 To what extent has the NEC Directive helped to improve the information and data available around air pollution and its impacts (e.g. reporting of emissions, ecosystem monitoring)?

	Significantly improved	Somewhat Improved	Neutral or no impact	Somewhat worsened	Significantly worsened	Don't know
Emissions of the five pollutants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contribution of source sectors to emissions of the five pollutants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Spatially disaggregated inventory data (emissions reported on a grid defined by geographical coordinates to show the distribution of emissions)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution linked to large point sources (source of emissions that is precisely localised, e.g. power plants)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effect of air pollutants on ecosystems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National policies and measures to reduce air emissions , e.g. those reported in the NAPCPs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

23 Do you think other EU policies and strategies have affected emissions of the five main pollutants addressed by the NEC Directive? If so, how?

	Significantly reduced emissions	Somewhat reduced emissions	Somewhat increased emissions	Significantly increased emissions	Not affected	Don't know
Ambient Air Quality Directives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial Emissions Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Zero Pollution Action Plan	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Agricultural Policy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Methane Strategy (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ecodesign Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Renewable Energy Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy Efficiency Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
REPowerEU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biodiversity Strategy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Euro vehicle emission standards (see also this link)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
CO2 standards for cars and vans (see also this link)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-Road Mobile Machinery legislation (Regulation (EU) 2016/1628 , see also this link).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other EU legislation (not covered above)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other EU Strategy (not covered above)



Efficiency

This section gathers your views on whether the NEC Directive is achieving its benefits in a cost-efficient manner.

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

25 What have been the most significant costs associated with achieving the NEC Directive's objectives?

	High costs	Moderate costs	Low /minimal costs	Not applicable	Don't know
Administrative costs for the development of an NAPCP (Member States)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative costs of reporting obligations (Member States, e.g. emission inventories and projections)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative costs of monitoring and reporting ecosystem effects (Member States)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Abatement costs (emission reduction measures) - Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Abatement costs (emission reduction measures) – business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative costs for business	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

26 If you chose "other", please specify and add your views on the significant costs associated with achieving the NEC Directive's objectives. For conciseness your answer is limited to 450 characters.

450 character(s) maximum

None of the above should be accounted for as costs but on the contrary considered as investments into healthy people on a healthy planet. The only actual cost that should be accounted in the frame of this policy is the cost of the health and environment burden of the failure to prevent air pollutants emissions.

27 Do you believe any of the requirements of the NEC Directive carry unnecessary administrative costs or are too complex or difficult to apply? For conciseness your answer is limited to 450 characters.

450 character(s) maximum

28 To what extent has the NEC Directive delivered the following benefits?

	To a large extent	To some extent	To no extent	Not applicable	Don't know
Protecting human health	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting the environment (e.g. ecosystems)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing economic costs linked to air pollution (e.g. health costs, lost working days, crop losses)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction in emission of greenhouse gases	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy or fuel cost savings	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

30 Overall, how have the benefits of the NEC Directive compared to the costs of its implementation?

- Benefits greatly outweigh the costs
- Benefits somewhat outweigh the costs
- Costs and benefits are in balance
- Costs somewhat outweigh the benefits
- Costs greatly outweigh the benefits
- Don't know

31 The NEC Directive requires Member States to develop NAPCPs and policies and measures (PaMs) to reach their emission reduction commitments. To what extent have these requirements supported the identification of the most cost-effective actions to reduce emissions and prioritised their uptake?

- Greatly supported
- Somewhat supported
- Somewhat impeded
- Greatly impeded
- Don't know

Coherence

This section explores the coherence of the Directive with other EU policies.

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

32 To what extent do you think the NEC Directive is coherent with the following policies or initiatives?

	Highly coherent	Somewhat coherent	Somewhat incoherent	Highly incoherent	Not applicable
Ambient Air Quality Directives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial Emissions Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Zero Pollution Action Plan	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Agricultural Policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Nitrates Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Methane Strategy (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ecodesign Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Renewable Energy Directive (see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy Efficiency Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
REPowerEU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biodiversity Strategy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Euro vehicle emission standards (see also this link)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
CO2 standards for cars and vans (see also this link)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-Road Mobile Machinery legislation (Regulation (EU) 2016/1628 , see also this link)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The Gothenburg Protocol	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other EU legislation (not covered above)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other EU Strategy (not covered above)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

34 To what extent do you think the NEC Directive has a specific impact on innovation? Are measures affecting (positively and negatively) innovation?

Are the measures adapted to rapid technological development? For conciseness your answer is limited to 450 characters.

450 character(s) maximum

35 Where you have identified a potential area of incoherence, please elaborate on the nature of the incoherence between the NEC Directive and the identified legislation or policy. For conciseness your answer is limited to 450 characters.

450 character(s) maximum

36 To what extent do you think that EU funding (e.g. grants) contributed to the objectives of the NEC Directive?

Funding refers to EU funding supporting air quality initiatives, for example under the LIFE Programme; Horizon Europe; Recovery and Resilience Facility; regional policy; Connecting Europe Facility funding transport infrastructure; Common Agricultural Policy.

- Significant positive influence
- Somewhat positive influence
- No influence
- Somewhat negative influence
- Significant negative influence
- Don't know

37 Please elaborate on your answer, specifying which funding stream you are commenting on. For conciseness your answer is limited to 450 characters.

450 character(s) maximum

38 Has the non-inclusion of methane in the NEC Directive...

	Yes	No	Maybe	I don't know
... limited the reduction of methane emissions from agriculture	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
... limited the reduction of methane emissions from waste	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
... limited the reduction of methane emissions from energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
... limited the reduction of ozone levels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Relevance

This section explores whether the NEC Directive's objectives and requirements are still relevant considering possible changes in needs and context.

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

39 Please complete these sentences:

	...too ambitious	...appropriate	...too lenient	...I don't know
The emission reduction commitments for SO ₂ in my country are...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The emission reduction commitments for NO _x in my country are...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The emission reduction commitments for NMVOC in my country are...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The emission reduction commitments for NH ₃ in my country are...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The emission reduction commitments for PM _{2.5} in my country are...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The policies and measures introduced in my country to reduce air pollution are...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The agricultural measures listed in Annex III part 2 of the Directive (see details in Introduction Section) are...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

40 Do you agree with the following statements?

	Strongly Agree	Somewhat Agree	Neither agree or disagree	Somewhat Disagree	Strongly Disagree	Don't Know
Air pollution is still having a significant detrimental effect on human health and the environment in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The level of emission reduction commitments is still appropriate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

The range of air pollutants covered by emission reduction commitments is still appropriate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The range of air pollutants included for reporting only is still relevant (e.g. heavy metals, black carbon, persistent organic pollutants, etc. – see Annex I of the Directive)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The NEC Directive is still a relevant tool to comply with EU and Member State international commitments (Gothenburg Protocol)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is still insufficient co-ordination between Member States to effectively design and deliver air pollution policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is still insufficient co-ordination between national, regional and local levels within Member States to effectively design and deliver air pollution policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ecosystems monitoring is still appropriate and relevant	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

41 Please provide any further details in relation to your responses above

42 Certain sources of emissions are not counted towards achieving emission reduction commitments. Has this hindered achieving the objectives of the NEC Directive?

	Significantly hindered	Somewhat hindered	No impact	Not applicable	Don't know

NOx, NMVOC emissions during manure management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
NOx, NMVOC emissions from agricultural soils (for example from fertiliser application)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aviation at cruise level (beyond take-off and landing)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
International maritime traffic	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

EU added value

This section will focus on determining the added value of the NEC Directive compared to national, regional, and local initiatives.

Please note that questions in this survey are numbered, but some questions only appear depending on the answer provided to previous questions. Therefore, question numbers may not be consecutive.

43 To what extent do you agree or disagree with the following statements

	Completely agree	Somewhat agree	Neutral	Somewhat disagree	Completely disagree	Don't know
Transboundary pollution remains a significant source of air pollution across EU Member States.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU level legislation is necessary to reduce emissions of the air pollutants addressed in the NEC Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National legislation could have achieved the same results in the absence of the NEC Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Significant variation in air pollution and associated (health etc.) costs across Member States could occur in the absence of NEC Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-compliance with international commitments in the absence of the NEC Directive would be likely	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

44 Considering your answers to the above question, could you explain your viewpoint in more detail?

Concluding questions

45 Please provide any other comment or suggestion you would like to share regarding the evaluation of the NEC Directive

46 If you would like to upload a file with information relevant to your submission, please do so below.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

74345487-21b3-409c-a745-0b04df722749/cpme.2024-145.Additional.Response.to.NEC.Directive.Consultation.pdf

Thank you for taking the time to complete this survey! Your responses will be considered in the evaluation of the NEC Directive.

You may go back to review or edit your answers.

To submit your survey, please click the "submit" button below.

Contact

ENV-NECD@ec.europa.eu

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

CPME additional response to the European Commission consultation on the evaluation of the National Emission Reduction Commitments Directive (NECD)

To increase health and economic benefits which can be achieved through the National Emission Reduction Commitments Directive (NECD), it is key to:

1. **Step up on EU member states implementing the directive:** It crucial to follow the latest science, increase the level of ambition by accelerating the pace of mandatory emissions reduction, as well as strengthen enforcement. This will result in more effective public health protection and set member states on track for compliance by 2030.
2. **Strive for greater coherence in the EU legal framework:** Stronger linkages between the NECD and the EU directive on ambient air quality (AAQD) are needed, especially through aligning the calculation of annual national reduction obligations with the attainment of AAQD limit and target values by 2030. This will result in the NECD becoming a key instrument to contribute to the success of the revised AAQD and prepare the EU's clean air framework for the post 2030 period.
3. **Strengthen health prevention efforts to reduce emissions of key air pollutants and precursors:** Loopholes must closed for example by including reduction obligations for methane (CH₄) emissions and by ending subsidies of ammonia (NH₃) emitting practices. This will result in decreased concentrations of PM_{2.5}, ozone and ammonia and reduce the corresponding health burden.