



Brussels, 10 December 2015

Dear Ministers,

Subject: Public Health recommendations for strong National Emission Ceiling (NEC) Directive

We, the undersigned 17 health organisations, representing thousands of health professionals and affected European citizens, are writing to you ahead of the 16th December meeting where you will discuss the revision of the National Emission Ceilings (NEC) Directive to urge you to support saving the lives of tens of thousands of Europeans lost each year. We urge you to:

1. Keep **methane** and **mercury** among the pollutants covered by the targets, based on the strong scientific evidence of their contribution to air pollution and health impacts;
2. **Include legally binding targets** for all pollutants for Member States to be **met by 2025**, targets supported by the European Parliament, and give priority to early action to significantly decrease air pollution
3. **Support greater emission reduction commitments (ERCs)** going beyond the 52% reduction in health impact by 2030 as proposed by the European Commission. This is especially important **for ammonia** as cutting its emissions would reduce Particulate matter (PM) levels and exposure and therefore **improve people's health**;
4. **Reject unnecessary flexibilities** which could **in-fact dilute the ambitious content of the Directive**, such as the adjustment of emission inventories, adjustment of emission factors and three-year averaging in case of dry summers or cold winters.

According to the World Health Organization (WHO), exposure to air pollutants, including fine particulate matter, is a leading risk factor for non-communicable diseases in adults, including **ischemic heart disease, stroke, chronic obstructive pulmonary disease (COPD), asthma and cancer**. WHO evidence also underline that **children's healthy development** is particularly under threat from air pollution.¹ It poses a considerable health threat not only to current but also future generations.² New studies are emerging which indicate the role of ambient air pollution in the development of other chronic conditions such as **diabetes, liver disease, mental health, obesity³ and childhood leukaemia⁴**. Air pollution has a **gender dimension too** because of physiological differences between women and men leading to differing pollutant health effects. PM associated Cardiovascular Disease (CVD) risks are statistically significantly higher among women with diabetes⁵.

The public health context in terms of protecting EU citizens' health and **reducing the chronic disease burden and its associated costs** to healthcare systems is a vital consideration in this debate. The European Environment Agency (EEA) estimated in its recent report that long-term exposure to PM2.5 caused **403,000 premature deaths** in the EU-28 in 2012.⁶ In addition, the health related economic costs are enormous, and amount to as much as **€940 billion for the year 2010 alone**.⁷ The Directive you are discussing **will make an important contribution to reaching air quality as recommended by the WHO**. We urge you not to weaken it to protect interests or groups, but instead strengthen the Commission proposal.

For the contested points of the Directive on the agriculture sector, the NEC proposal could affect mainly **large industrial farms**, as the Directive offers flexibility to Member States to decide which farms they want to address and therefore small farms can be excluded. There are also transition mechanisms with funding support envisaged.

Nothing is of more importance as a European issue than the air we breathe. As air pollution does not recognise borders, the EU must - and has the power - to act to protect the health of its citizens, halt premature deaths and keep health systems sustainable. We hope we can count on your support and strong political leadership for **this vitally important public health issue**.

Yours Sincerely,

Comité Développement Durable Santé, Council of Occupational Therapists, European Academy of Allergy and Clinical Immunology, European COPD Coalition, European Federation of Allergy and Airways Diseases Patients' Association, European Hematology Association, European Heart Network, European Institute of Women's Health's, European Public Health Alliance, European Respiratory Society, France Nature Environnement, Health and Environment Alliance, Health Equalities Group, Initiativ Liewensufank, Malta Health Network, No Pain Foundation, Royal College of Physicians

Notes

1. WHO REVIHAPP project: http://www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report-final-version.pdf?ua=1
2. WHO regional office for Europe. Air quality and health resolution adopted at the sixty-eighth World Health Assembly. 2015. <http://www.euro.who.int/en/health-topics/environment-and-health/air-quality/news/news/2015/05/air-quality-and-health-resolution-adopted-at-the-sixty-eighth-world-health-assembly>
3. Eze I C, Schaffner E, et al. Long-term air pollution exposure and diabetes in a population-based Swiss cohort. *Environ Int* 2014; 70: 95-105.
4. Houot, Jennifer, Fabienne Marquant, Stéphanie Goujon, Laure Faure, Cécile Honoré, Marie-hélène Roth, Denis Hémon, and Jacqueline Clavel. 2015. "Residential Proximity to Heavy-Traffic Roads, Benzene Exposure, and Childhood Leukemia—The GEOCAP Study, 2002–2007." *American Journal of Epidemiology* 182 (8): 685–93. doi:10.1093/aje/kwv111.
5. Jaime E. Hart, ScD1 et. Al. Effect Modification of Long-Term Air Pollution Exposures and the Risk of Incident Cardiovascular Disease in US Women *Am Heart Assoc.* 2015; 4: e002301 originally published November 25, 2015. <http://jaha.ahajournals.org/content/4/12/e002301.full?sid=0e76bb32-2e13-47bc-8fe7-e41d6414bec0>
6. <http://www.eea.europa.eu/media/newsreleases/many-europeans-still-exposed-to-air-pollution-2015/premature-deaths-attributable-to-air-pollution>
7. European Commission. Commission Staff Working Document: Impact Assessment on National Emissions Ceiling (NEC Directive) http://ec.europa.eu/environment/archives/air/pdf/Impact_assessment_en.pdf



The **Comité Développement Durable Santé C2DS** is an association of 500 public-private non profit and private hospital members in France founded in 2006. The aim of the C2DS is to raise awareness among key players in the healthcare sector and to promote the advantages of better practices in order to manage the environmental, human and economic impacts of healthcare activities.



The **Council of Occupational Therapists** for the European Countries is the European organization for all Occupational Therapists through their National Associations. www.coteceurope.eu



The **European Academy of Allergy and Clinical Immunology (EAACI)** is the largest medical association in the field of allergy and clinical immunology, uniting more than 9,000 academicians, research investigators and clinicians from 121 different countries.



The **European COPD Coalition (ECC)** is a not for profit association committed to raising awareness among European policy makers and stakeholders about Chronic Obstructive Pulmonary Disease (COPD) and its social and economic impacts. The ECC urges swift political action to fight COPD, to uphold and support the cause of millions of patients.



The **European Federation of Allergy and Airways Diseases Patients' Associations (EFA)** is a non-profit network of allergy, asthma and chronic obstructive pulmonary diseases (COPD) patients' organisations, representing 40 national associations in 24 countries and over 400,000 patients. Visit <http://www.efanet.org> for more information.



The **European Hematology Association (EHA – ehaweb.org)** is the leading European society for haematology—the medical specialty dealing with blood. We promote excellence in patient care, research and education in European haematology and represent the interests of the discipline, its clinicians and its scientists. We seek to influence policies to increase research funding opportunities, to improve research regulations, to optimize access to medicines, and to harmonize and improve education and training.



The **European Heart Network (EHN)** is a Brussels-based alliance of heart foundations and likeminded non-governmental organisations throughout Europe, with member organisations in 24 countries. The EHN plays a leading role in the prevention and reduction of cardiovascular diseases, in particular heart disease and stroke, through advocacy, networking, capacity-building and patient support, so that they are no longer a major cause of premature death and disability throughout Europe.



The **European Public Health Alliance (EPHA)** is a change agent – Europe's leading NGO advocating for better health. We are a dynamic member-led organisation, made up of public health NGOs, patient groups, health professionals, and disease groups working together to improve health and strengthen the voice of public health in Europe. <http://www.epha.org/>



France Nature Environnement is a French federation of environmental and nature protection associations. It represent over 3500 associations present on the entire French territories, metropolis and over-seas. France Nature Environnement works on a very broad panel of subjects link to Environment: Agriculture, Water, Health, Economy, Transport, Oceans, Energy, Forest, Education, and is present in more than 200 authorities and governing bodies.



The **European Institute of Women's Health's** research reports and communication materials highlight that the incidence and prevalence of some diseases are higher in women than men, while others affect men and women differently. Sex and gender are important variables in understanding health and health behaviour.



The **European Respiratory Society (ERS;** www.ersnet.org) is an international organisation that brings together physicians, healthcare professionals, scientists and other experts working in respiratory medicine. Our mission is to promote lung health to alleviate suffering from disease and drive standards for respiratory medicine globally. Science, education and advocacy are at the core of everything they do.



The **Health and Environment Alliance (HEAL)** is a leading European not-for-profit organisation addressing how the environment affects health in the European Union (EU). With the support of more than 70 member organisations, HEAL brings independent expertise and evidence from the health community to different decision-making processes.

HEALTH
EQUALITIES
GROUP



Health Equalities Group (HEG) is a UK-based social enterprise that seeks to tackle the root-causes of health inequalities by promoting population-level measures in tobacco control, alcohol, diet and nutrition and physical activity. Health Equalities Group achieves this through research, advocacy, consultancy and the delivery of practical projects and programmes in communities. www.hegroup.org.uk



Initiativ Liewensufank provides comprehensive information, advice and courses for expectant and new parents, carry out public awareness raising and administrative work and advocacy on behalf of the aims of the organisation. The aim of the Initiativ Liewensufank is to improve circumstances around birth. We campaign amongst other things for: raising public awareness about environmental issues to protect the health of our families and the environment, and to ensure that life is still worth living for future generations. <http://www.liewensufank.lu/>



The **Malta Health Network** was set up in 2007 with the aim of representing in Malta, in the EU and internationally, the interests of patients and the health of the community, developing better coordination, collaboration and capacity building through exchange of best practice among Health Non Governmental (NGO) 'not for profit' (NPO) Organizations and Patient Representation Groups (PRGs). MHN is independent of the Government of Malta and of any political party or organization.



No Pain Foundation has been established in Malta at the end of 2014 to create an international non-profit organization for the purpose of carrying out social, educational as well as research and development activities in the field of pain management and pain therapies. Our mission is to Improve the quality of life of people living with chronic pain promoting awareness about chronic pain. This the reason behind the three macro purposes of No Pain Foundation: Education, Research and Care.



**Royal College
of Physicians**

The **Royal College of Physicians (RCP London)** was founded in 1518 as a professional body of physicians whose individual membership now spans 80 countries including 24 Member States of the European Union. The College aims to improve the quality of patient care by continually raising medical standards through education and training for physicians and works with government, the public, patients and other professions to improve health and healthcare. www.rcplondon.ac.uk