



European Public Health Alliance (EPHA) recommendations to reduce health related costs for **the EU on 'Emission Performance Standards for new passenger cars and for new light commercial vehicles'**

Dear Deputy Permanent Representative,

I am writing to you on behalf of the European Public Health Alliance (EPHA), an umbrella platform bringing together 87 international, European and national organisations advocating for better public health for all in Europe - and we are calling on you to reduce air pollution related health costs by agreeing on the highest possible CO<sub>2</sub> emission standards during these negotiations (20% by 2025 and 40% by 2030).

This is an ambitious but realistic compromise which will bring significant health savings, as solid evidence shows that switching to zero and low emission alternatives to achieve CO<sub>2</sub> targets will have additional benefits by reducing health-harmful pollutants (PM, NO<sub>x</sub>, or Ozone).

Our recommendations are underpinned by a [new robust study](#)<sup>1</sup> which for the first time quantifies how much air pollution (and specifically diesel-based air pollution) costs in term of public spending by national governments and compulsory health insurers. The study carried out 9 country-specific case-studies covering [Austria, Bulgaria, Estonia, Germany, Hungary, Poland, Romania, Slovenia and Spain](#) and concludes that if ambitious policies curbing emissions were implemented in the very near future, they could save up to €12 billion costs by 2030. This would not only mean that a significant amount of money could be invested differently, but also would ensure a healthier population and a healthier workforce, contrasting with arguments that view ambitious pro-health and environment policies as an economic burden. Please note that this is still a conservative estimate; more ambitious models could identify even higher savings.

It is not an exaggeration to speak about a public health emergency given that air pollution is the number one environmental health risk factor. To address this, may I draw your attention to the following EPHA recommendations:

1. The CO<sub>2</sub> emissions targets for 2025 and 2030, proposed by the Council of EU, are inadequately low and must be increased to speed up transition to low and zero emission cars. At least 20% is needed in 2025 and 40% in 2030;
2. Europe is behind when it comes to shift to zero and low emission vehicles, so stronger incentives for manufacturers such as the penalty for failing to sell enough Electric Vehicles are needed, as already called for, by the European Parliament;
3. Most crucially, the regulation should promote a shift to truly clean zero emission vehicles that would pose no health risk to consumers, which is why the 0.5 multiplier agreed by the Council on 9 October 2018 should be removed. This is a serious weakening as it would distort the market in favour of more polluting hybrid vehicles and allow carmakers achieve the Electric Vehicle targets on paper (but not real world);
4. While sales of zero and low emission vehicles in Central and Eastern EU member states should be aided, the current Council amendment on double-counting would fail to achieve that aim. The amendment risks undermining the stringency of the CO<sub>2</sub> targets and can be easily gamed by manufacturers, who can register the cars in double-counted countries but then sell the on to major electric vehicle markets shortly afterwards. A more targeted system is needed to help countries like Romania and Poland, whereas the current proposal would double-count cars in more than half of EU countries;

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<sup>1</sup> Health Impacts and Health Costs of Diesel Emissions in the EU  
<https://epha.org/ce-delft-health-impacts-costs-diesel-emissions->



5. The CO2 emission targets agreed must be achieved in the real world, and not be only paper targets - for this reason the Council and Commission should support the EP amendments on using fuel consumption meters to control the gap after 2021.

More ambitious targets are still achievable, but only if you take this opportunity and agree on the highest standards being put on the negotiation table. We call on you to take this opportunity to show political leadership and reach an agreement which will protect the health of patients, consumers and families in Europe.

Respectfully Yours,

Yves Brand  
Vice-President  
European Public Health Alliance