



European Public Health Alliance (EPHA) – Contribution to the European Commission Evaluation of the 2016 National Emissions reduction Commitments Directive (NECD)

The European Public Health Alliance (EPHA) welcomes the opportunity to contribute to this public consultation on the evaluation of the current National Emission reductions Commitments Directive (NECD), a cornerstone of EU efforts to combat air pollution and reduce its staggering toll on public health. Air pollution remains the leading environmental health risk in Europe, contributing to hundreds of thousands of premature deaths and economic costs amounting to hundreds of billions. When the emission reduction commitments were set in 2016, their ambition was already limited for the time; our growing understanding of air pollution's pervasive harm – and the absence of a safe threshold for human health – underscores the urgent need to strengthen action, fully meet 2030's objectives and prepare for an ambitious post-2030 period.

Current gaps in compliance and coherence further diminish the NECD's effectiveness in preventing avoidable health impacts. The European Environment Agency (EEA) reports that 13 Member States are failing to meet existing emission reduction commitments for at least one pollutant regulated by the Directive. Without robust interim milestones, such as a binding 2025 target, opportunities to avert costly delays are being missed. Projections for 2030 indicate continued non-compliance for emission reduction commitments of key pollutants, perpetuating health and economic harms.¹

To maximize the NECD's potential to protect public health, we urge the European Commission to:

1) Accelerating NECD's implementation and enforcement

- Ensure strict and accelerated compliance with existing emission reduction targets, closing enforcement gaps to ensure that the first step is taken towards realising an adequate level of public health protection.

2) Ensuring policy coherence to reduce emissions and safeguard public health

- Enhance coherence between national emission reduction obligations and the limit and target values introduced in the revised EU Ambient Air Quality Directive. This will contribute to fully realising the role of NECD as a cornerstone for clean air action, steering

¹ [Air pollution in Europe: 2024 reporting status under the National Emission reduction Commitments Directive — European Environment Agency; Third Clean Air Outlook](#)

the EU towards ambitious, science-based commitments for emission reductions beyond 2030.

- Ensure consistency between emission reduction commitments and other relevant policies and instruments impacting key emitting sectors. Actions in this area should include the introduction of emission reduction commitments for methane, a reconsideration of the classification of biomass as a renewable energy and phasing out subsidies that support industrial practices driving non-compliance with ammonia reduction commitments. Greater convergence between health protection efforts, air quality and climate goals must be realised across all policies.

Thank you for considering our comments. Reinforcing the NECD's ambition, compliance, and coherence are all crucial steps to take to address the persistent health impacts of air pollution, ensuring the EU leads globally in clean air policy while delivering substantial health and economic gains.

ABOUT EPHA

EPHA is a change agent, Europe's leading NGO alliance advocating for better health. A member-led organisation made up of public health NGOs, patient groups, health professionals and disease groups, we work to improve health and strengthen the voice of public health in Europe. Our actions and campaigns reflect our values: equity, solidarity, sustainability, universality, diversity and good governance.

Since formal establishment in spring 1993, EPHA has built a solid network of over 50 members dedicated to providing better health for all. Our mission is to bring together the public health community to provide thought leadership and facilitate change; to build public health capacity to deliver equitable solutions to European public health challenges, to improve health and reduce health inequalities. Our vision is of a Europe with universal good health and well-being, where all have access to a sustainable and high-quality health system: A Europe whose policies and practices contribute to health, both within and beyond its borders.