

The Confederation of Swedish Enterprise on the revision of the Ambient Air Quality Directives

The Confederation of Swedish Enterprise brings together 50 industry and employer organisations and 60,000 companies and work on issues that are important to all companies, irrespective of sector and size.

We welcome the possibility to contribute to the ongoing impact assessment carried out in view of a possible revision of the Ambient Air Quality Directives (AAQD). The Confederation of Swedish Enterprise supports the initiative to strengthen the ambient air quality in the EU. As several air pollutants can travel long distances, which could affect nearby countries, Swedish Enterprises welcomes initiatives that harmonises additional monitoring and modelling of ambient air in the EU. Here are our key messages:

- As the legal framework for air quality is updated, Swedish Enterprise want to emphasize the importance of setting achievable and measurable targets. Furthermore, the framework must account for industries' global competitiveness by setting a realistic timeline for implementation.
- Swedish Enterprise wants to emphasise the necessity to avoid double regulation. As large industries are already regulated under the Industrial Emissions Directive and BAT standards, more stringent air quality measures should focus on excluded activities.
- Air quality standards should be implemented where the benefit is the greatest. Hence, the locations where the general population are of risk to the exposure to air pollutants. Additional modelling could help identify these locations.
- Several factors affect the air quality and Swedish Enterprise highlights the importance of not single out individual pollutants as the main focus of the directive. Instead, the Commission must target a generally improved air quality.

The Confederation of Swedish Enterprise supports the WHO Air Quality Guidelines. However, it is critical to make the guidelines measurable, achievable and to set a reasonable timeline for when the WHO AQG should be achieved, together with social, economic and environmental considerations. Furthermore, the green transition in the EU will by itself lead to reduced air emissions. Therefore, an implementation of the WHO AQG must be harmonised with the already set targets and timelines of the EU climate goals. We also want to emphasize the importance of safeguarding industries competitiveness in any future policy framework for air quality e.g., sampling methods, new techniques and science, interim targets etc.

In Sweden the general air quality is good, except for local hot spots. We therefore support the ambition that all air quality standards are met in general throughout the nation and that the focus should be on areas where the exposure of air pollutants to the general population is the greatest. Swedish Enterprise further supports additional monitoring and modelling of the ambient air equally throughout the nation.

Increased emission monitoring and modelling across Europe should also be prioritised to create models over air flows.

Since several pollutants could travel long distances, affecting nearby countries, Swedish Enterprise supports harmonised measures to increase ambient air in the EU. Additional, harmonised, modelling could further help identify locations where exposure to air pollutants is high and to ensure comparability in the member states.

As several factors affect the air quality, Swedish Enterprise highlights the importance of not targeting individual pollutants through the directive. Instead, the Commission should aim for generally improved air quality.

Further, it is important to avoid double regulation. Since current source legislation IED and BAT standards already determine strict provisions for air emissions and will set stricter provisions in the future (IED revision, E-PRTR revision), additional measures to increase ambient air quality should focus on other activities.

Lastly, Swedish Enterprise supports the Commission's initiative to educate the public and distribute additional information of the health effects of air pollution.

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