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**NOTE**

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From: General Secretariat of the Council  
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No. prev. doc.: 9247/15 ENV 346 ENER 203 IND 87 TRANS 177 ENT 96 SAN 157  
PARLNAT 55 CODEC 777

No. Cion doc.: 18167/13 ENV 1235 ENER 600 IND 388 TRANS 693 ENT 356 SAN 555  
PARLNAT 325 CODEC 3086 - COM(2013) 920 final

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Subject: Proposal for a Directive of the European Parliament and of the Council on  
the reduction of national emissions of certain atmospheric pollutants and  
amending Directive 2003/35/EC

- Delegations contributions to the policy debate

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Delegations will find in the Annex the contribution received from Austria to the policy debate on  
the abovementioned proposal, during the Council (Environment) on 15 June 2015.

As stated at several occasions Austria welcomes the new „Clean Air Programme for Europe” in general and likes to stress its basic necessity. In the EU air pollution is the major cause for adverse health impacts. Austria is convinced that ambitious reduction targets are needed, but of course targets must be realistic and achievable with proportionate measures.

*Question 1:*

*Building on the results of the Council' s debate in June 2014 where a stepwise approach towards the 2030 horizon, with the contribution of all sectors, was supported, what are the main difficulties in attaining the 2030 horizon as updated?*

Due to the current problems with the 2010 NO<sub>x</sub> emission ceiling we know from our own experience that scenarios – although used as a basis for reduction targets – bear a great degree of uncertainty. This is especially true for future emission factors and activity data – which are related to technical, economic and demographic developments.

The issue is more complicated for air pollutants than for the determination of CO<sub>2</sub> targets. In the case of air pollutants the uncertainty of fuel use and fuel mix is multiplied by the unknown future development of emission reduction technology. Difficulties to comply with the reduction targets for the year 2030 can only be partially foreseen at present.

Some assumptions in the present IIASA scenarios are considered as very optimistic by Austrian experts. In addition, it is likely that the real mitigation effect of new emission regulations at Union level will differ from the original assumptions in the scenarios, for example in relation to the Medium Combustion Plants Directive or Eco-Design Directive regarding boilers and stoves.

*Question 2:*

*With a view to the lead target to reduce by 50% the number of premature deaths in the EU, what additional elements, if any, could be explored in order to elaborate solutions for the 2030 horizon which are both realistic and ambitious?*

The economic and technological development during the coming 15 years will differ more or less from the current IIASA-scenarios, which are the basis for the 2030 reduction targets.

Austria would like to present three proposals to take account of the uncertainty:

1. A clear documentation of the scenario assumptions, e.g. in an Annex of the new NEC-Directive, would allow for checking feasibility of the targets at a later stage.
2. A technical review of the 2030 targets in the year 2025 can verify if the assumptions which have been made beforehand are consistent with the developments in reality; the reduction targets can be revised if necessary.

3. Sectoral reduction targets – for instance in the transport sector – could be laid down in the Directive. In that case, unexpected and unfavourable developments in the transport sector would not have to be compensated by measures in other sectors causing disproportionately high costs, e.g. by measures that would go far beyond BAT in industry.
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