



**COUNCIL OF
THE EUROPEAN UNION**

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NOTE

From:	General Secretariat of the Council
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Subject:	A Clean Air Programme for Europe a) Proposal for a Directive of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants b) 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 - Orientation debate = Comments from delegations
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Delegations will find in Annex the written contribution of Sweden to the above-mentioned Council debate.

SWEDEN

Poor air quality is the cause of more than 400 000 EU citizens' premature deaths every year. Air pollutants also affect ecosystems in large areas. Europe needs a tough and ambitious air policy to tackle these problems. Sweden supports the Commission's proposal for a new NEC Directive and is pleased to note that the air quality objectives set out in the EU's Sixth and Seventh Environmental Action Programme, i.e. that air pollution should not lead to significant negative impacts on health and the environment, is the guiding principle for the air pollution policy within the EU.

The economic benefits of reducing air pollution are significant compared to the cost of the measures proposed. According to the Commission's most conservative estimates, the economic benefits are at least 12 times higher than the costs. Ambitious goals within the framework of the 2030 climate and energy policy would further reduce the costs. This is important to bear in mind in our further deliberations.

An important principle of the NEC Directive is that member states themselves can decide how to attain the emission ceilings. Of course, all relevant sectors should be included to achieve the emission ceilings in the most cost-efficient way. As the condition for achieving the goals differs from country to country measures should be taken on national level. This is essential in order to allow member states to deploy the most cost-effective measures across sectors.

The proposal on medium combustion plants covers the largest gap in the European legislation on emissions of air pollutants. Sweden welcomes both the level of ambition and that it covers plants of at least 1 MW.

Any modifications must ensure that the total efforts of individual Member States remain the same.

We believe an analysis is needed on the cost effectiveness of the emission limit values for particles for the smallest plants. There may be a risk that the use of biofuels becomes too expensive and this would be in contradiction with our climate policy.

We would also like to point out that it is of utmost importance that the Gothenburg protocol is ratified without further delay. The protocol enters into force when two thirds of the Parties to the present protocol have ratified, which means that ratification by the EU member states is decisive. During the negotiations of the Gothenburg Protocol, one of the most important priorities for the EU was to get new Parties on board. This is only possible once the Protocol has entered into force. Sweden therefore considers that the EU should go forward with ratification as soon as possible.