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**NOTE**

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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 contributions from DE and SK to the policy debate, during the Council (Environment) on 15 June 2015.

GERMANY

Air pollutant concentrations are still much too high in Germany and other EU Member States, placing a burden on human health and the environment.

An increasing share of this pollution is transboundary, and many Member States still have considerable potential for cost-efficient emission reductions.

We therefore need further emission reductions at EU level in order to come closer to reaching the long-term air quality target laid down in the 7th Environment Action Programme.

We welcome in principle the Commission proposal for emission reduction commitments to be achieved by 2030. In our opinion, these should be

- binding, to provide a reliable framework for investments, air quality management etc. and to guarantee planning certainty.
- realistic, which means technically feasible, based on scientific facts and economically sensible.
- balanced, by using existing emission reduction potential in all Member States.
- Finally, the proposal should be adequate to reach the environmental and health targets identified.

We welcome the fact that the Presidency eliminated methane from the Commission draft. Duplication of provisions in different areas of legislation must be avoided.

As regards the difficulties Germany does not see sufficient technological potential to achieve the emission reductions for volatile organic compounds (NMVOC) and primary particulate matter (PM<sub>2,5</sub>) as proposed for Germany. For the other pollutants (e.g. ammonia) the assessments of economic viability and feasibility have not been finalised yet.

Flexible provisions are useful to safeguard Member States against uncertainties which they cannot avoid via national policy decisions. However, these flexible provisions must not undermine the aims and scope of the directive. In our opinion, the existing system of the Inventory Adjustment which we jointly agreed on in the amended Gothenburg Protocol is absolutely sufficient to deal with uncertainties. However, this flexibility mechanism should be applicable for an unlimited time. We reject the Commission proposal of limiting the period of applicability to 2025.

If future reports from the Member States show that the reduction commitments laid down in the Directive can only be insufficiently reached, or not reached at all, the Commission should carry out a review of its policy. This could be done in a separate committee.

## SLOVAK REPUBLIC

1. The updated proposal for reducing emissions by 2030 is based on assumptions that may not be fulfilled and a lot of uncertainty remains on the need to implement the additional national measures to ensure that these ambitious goals (set in Annex II) will be met. Therefore Slovakia would welcome that the targets for 2030 should be indicative while binding targets should be taken at a later stage around 2020. Some data, for example real composition of residential heating sources, are still missing for setting realistic targets. The Slovak government has adopted a strategy to increase food self-sufficiency. Its realization will mean an increase in emissions of ammonia in particular and to achieve the 43% reduction of ammonia (the highest reduction together with Hungary in the EU) will not be realistic. To achieve such ambitious targets for 2030 will require additional measures, particularly in sectors where it is difficult to implement them as for residential heating, transport, and agriculture. The implementing cost of these measures in the Member States with the economy as the Slovak will be higher and will have a negative impact on the social environment.
2. It would be appropriate to explore the possibility to have a more equal burden among the Member States and what impact such more equal cost should have on the main target. As regards the additional elements, that could be taken into consideration, in order to carry out solutions for the 2030 horizon are in relation to:
  - Ongoing legislative proposal for medium combustion plants, the adoption of which will close the legislative gap,
  - ensure that "real world emissions" of light duty vehicles are brought in line with regulatory requirements (i.e. that limit values are met under normal driving conditions) and
  - ensure full implementation of current legislation.

