

Consultation on options for revision of the EU Thematic Strategy on Air Pollution and related policies

Section 1/6: Introductory Questions	
A. Are you responding to this consultation as an individual or on behalf of an organisation? -single choice reply-(compulsory)	On behalf of an organisation
A1. What type of organisation do you represent? -single choice reply-(compulsory)	business: industrial interest group, business association, sectoral association
A1a. Please specify the sector of your activity (e.g. health, environment, transport, energy, multi-sector): -open reply-(optional)	Heating
A2. Does your organisation work mainly on an EU-wide basis or in a single country? -single choice reply-(compulsory)	EU-wide
A3. Please indicate the country where your organisation is located: -single choice reply-(compulsory)	Belgium
A4. Please indicate the name of your organisation: -open reply-(compulsory)	European Heating Oil Association (Eurofuel)
A5. Please indicate your name and title: -open reply-(compulsory)	Dr. Ernst-Moritz Bellinghen, President of the Technical Commission
B. Do you now work on air pollution issues, or have you done so in the past? -single choice reply-(compulsory)	Yes, air pollution has been one issue in my professional work
D. Please feel free to provide any further details regarding your answers to the introductory questions: -open reply-(optional)	
<p>The European Heating Oil Association (Eurofuel) represents the national organisations that promote the use of efficient heating oil for domestic heating in 10 European countries, including over 10,000 companies. Eurofuel is engaged in the promotion of existing and innovative techniques for heating oil and equipment, in the domestic market. In this way, our members are committed to ensuring the competitiveness and efficiency of heating with oil, while also reducing its environmental footprint. An important number of heating oil systems are located in rural areas, where customers have limited choice for their energy source, partly due to the lack of connection to energy grids.</p>	
<p>Unless you specify otherwise, your contribution will be published on the Commission's website. Please indicate here if you wish your contribution to be anonymous.(For full information please refer to the Specific Privacy Statement point 3)</p> <p>-single choice reply-(compulsory)</p>	You can publish this contribution as it is.
Section 2/6: Ensuring compliance with EU air quality requirements and coherence with international commitments in the short term	

1. How should the EU modify or supplement its approach to ensure compliance with current air quality legislation? (Please choose one or more responses) -multiple choices reply-(compulsory)	Additional non-legislative options: for example by establishing partnership agreements with MS that focus Member State efforts to address non-compliance with air quality objectives
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1a. Which options should be considered as additional non-legislative measures? (Please choose one or more responses) -multiple choices reply-(compulsory)	Other (please describe below in question 2)
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2. Please feel free to provide written comments on the course of action to ensure compliance with the current air quality legislation: -open reply-(**optional**)

- Providing information concerning specific air pollutant emissions, in an energy-source neutral way; - Developing better subsidy schemes to facilitate the uptake of cleaner technologies; - Continued industry efforts to facilitate the spreading of modern heating technologies and the trend towards the use of low-sulphur heating oil; - Tending towards equal limits for all energy sources (including wood), to provide for a level-playing field as regards air emissions

Section 3/6: Further reducing exposure to damaging air pollution in the medium to long term

Sub-section 3.1: Ensuring coherence between air pollution and climate change policies

3. How should future EU air pollution policy interact with a new climate and energy framework for 2030? (Please choose one response) -single choice reply-(compulsory)	It should maximise the synergies between the policies, but with no new air pollutant emissions reductions except those delivered by the climate and energy policy
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4. Should specific complementary action in the EU be pursued to curb emission of short-lived climate pollutants (SLCP) and their precursors, to improve both air quality impacts on health but also to boost climate mitigation in the short term? -single choice reply-(compulsory)	Yes
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4a. Should specific complementary action be pursued to curb black carbon emissions? (Please choose one response) -single choice reply-(optional)	Yes (please describe below in question 5)
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4b. Should specific action to address ozone precursors that are short-lived climate pollutants, such as methane, be reinforced? (Please choose one response) -single choice reply-(optional)	Yes (please describe below in question 5)
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5. Please feel free to provide comments on the interaction between air pollution and climate change policies: -open reply-(**optional**)

The promotion of burning biomass as such (in particular wood in individual smaller heating systems) in energy and thermal regulation can have negative impacts on health. The combustion of wood in smaller applications, which cannot be equipped with proper emission control and abatement techniques such as electric filters, generate at least 1,000 times as many particulate matters as homogeneous liquid or gaseous fuels.

Sub-section 3.2a: Strategic approach and target year of future air pollution policy

6. Which target year should be the main focus of the revised Thematic Strategy? (Please choose one response) -single choice reply-(compulsory)	2030
6a. If the target year is 2030, should the EU set an interim target for Member States to achieve for 2025 to strengthen the achievement of the 2030 objective? (Please choose one response) -single choice reply-(compulsory)	Yes, interim targets should be set on an indicative (i.e. voluntary) basis

Sub-section 3.2b: Strategic approach and target year of future air pollution policy

7. How much additional progress should EU air pollution policy pursue in the revised Thematic Strategy? (Please choose one response) -single choice reply-(compulsory)	The level delivered by the forthcoming climate and energy framework for 2030, without additional air pollutant emission reductions
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8. Please feel free to provide comments on the level of ambition: -open reply-(**optional**)

The industry has long been delivering voluntary reductions of pollutants through new technologies (higher efficiency boilers with lower emissions) and new products (low-sulphur heating oil). As an example, whereas the EU standard for sulphur is set at 1,000 ppm, our industry has managed to reduce it to 50 or even 10 ppm in certain countries. Furthermore, it is worth noting that, even for oil with 1,000 ppm, the evolution of heating oil quality in Europe, combined with new technologies (e.g. low NOx burners) has allowed the industry to reduce by 80% the emissions of NOx and by 90% the emissions of SOx over the past four decades.

Sub-section 3.3: Setting Priorities

9. How should EU air pollution policy give priority to addressing either human health or the environment? (Please choose one response) -single choice reply-(compulsory)	Equal weight to both
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10. Please feel free to provide comments on setting priorities: -open reply-(**optional**)

Environment and health are equally important and affect each other. As an example, a high level of PM in the air will equally impact the environment and public health.

Sub-section 3.4: Choice of policy instruments

Negotiate new emission reduction commitments for 2030 under the Gothenburg Protocol which are aligned with the ambition level determined for the revised strategy. To be effective, this option would require action to ensure that EU neighbouring countries join and ratify the 2020 emission reduction targets. -single choice reply-(optional)	2
In the National Emissions Ceiling Directive, establish emission ceilings for the 2025-2030 period which are aligned with the ambition level determined for the revised strategy. -single choice reply-(optional)	3
In the Ambient Air Quality Directive, adapt the AQ limit values for the 2025-2030 period to more stringent levels corresponding to the ambition level determined for the revised strategy.	4

-single choice reply-(optional)	
In EU legislation on emission sources, set more stringent emission requirements for industrial activities, motor vehicles and other air pollution sources, where cost-effective. -single choice reply-(optional)	5
Use non-legislative methods, such as existing EU funding schemes, urban air quality programmes, research and innovation actions or awareness raising (please specify in following question). -single choice reply-(optional)	1
Other instruments (please provide comments in question 12). -single choice reply-(optional)	6

12. Which other instruments should be used? -open reply-(optional)

Section 4/6: Revising the Ambient Air Quality Directive

Sub-section 4.1a: Aligning with latest scientific and technical knowledge

13. Should the indicative limit value for PM _{2.5} of 20 µg/m ³ for 2020 be made mandatory? -single choice reply-(compulsory)	No
14. Should the PM _{2.5} or other limit values in the AAQD be made more stringent to bring them closer to WHO guidance values? (Please choose one response) -single choice reply-(compulsory)	No change

Sub-section 4.1b: Aligning with latest scientific and technical knowledge (black carbon)

15. Should monitoring and regulation be introduced for black carbon/elemental carbon? (Please choose one response) -single choice reply-(compulsory)	Yes, introduce monitoring requirement
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16. Should any other components of particulate matter be addressed in the AAQD?
-open reply-(optional)

Sub-section 4.1c: Aligning with latest scientific and technical knowledge (ozone)

17. Which binding limit values (if any) should the AAQD set for ozone? (Please choose one response) -single choice reply-(compulsory)	No change
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Sub-section 4.2a: Management framework

18. Should any limit values be removed from the AAQD? If so, which? -open reply-(optional)

Sub-section 4.2b: Management framework

19. Should any *other* monitoring and reporting obligations be reduced in the AAQD? If so, which? -open reply-(optional)

Sub-section 4.2c: Management framework

20. Should zone-specific plans be consolidated into coordinated national plans? (Please choose one response) -single choice reply-(compulsory)

Yes

21. Should cooperation among Member States be reinforced to better address transboundary pollution flows that affect local air quality problems? (Please choose one response) -single choice reply-(compulsory)

Yes, the Member States concerned should be legally obliged to prepare joint air quality plans in cases of significant transboundary pollution

22. Please feel free to provide comments on the options for the revision of the AAQ Directive: -open reply-(optional)

Section 5/6: Revising the National Emission Ceilings Directive (NECD)

Sub-section 5.1: Aligning with latest scientific and technical knowledge

23. Should national emission ceilings be adopted for black carbon/elemental carbon? (Please choose one response) -single choice reply-(optional)

No

24. Should national emissions ceilings be introduced for other new pollutants? (Please provide written comments if you would like to propose ceilings for other pollutants) -open reply-(optional)

The focus should first be put on achieving current objectives.

Sub-section 5.2a: Management framework

25. Which mechanisms for flexibility should be introduced into the NEC Directive management framework? (Please choose one or more responses) -multiple choices reply-(optional)

Allowing limited adjustments of Member State emission ceilings, under specific circumstances and after approval by the Commission

Sub-section 5.2b: Management framework

26. Should coordination be required between the national and local levels in respect of emissions reduction measures and local air quality management? (Please choose one response) -single choice reply-(compulsory)

Yes

27. Please feel free to provide comments on the options for the revision of the NEC Directive:

-open reply-(optional)

Section 6/6: Addressing major air pollution sources

Sub-section 6.1: Road transport

Introduce with minimum delay the new test procedure to ensure that real world emissions of Euro 6 light duty diesel vehicles are as close as possible to the type approval limit values

-single choice reply-(optional)

Strengthen EU-wide requirements for in-service compliance with emissions standards, to ensure that light-duty vehicles on European roads continue to produce low emissions over their lifetime

-single choice reply-(optional)

Develop a new, more stringent standard to be mandatory for motor vehicles after 2020

-single choice reply-(optional)

Develop a supplementary more stringent standard, not mandatory, to be used by national and local governments in a harmonised way wherever air quality exceeds EU standards (e.g. to establish low emission zones), or to establish incentives at MS level to increase penetration of cleaner vehicles

-single choice reply-(optional)

Introduce standards to retrofit existing heavy duty vehicles (e.g. trucks, buses) to reduce their air pollution emissions

-single choice reply-(optional)

Introduce a mandatory road charging scheme for heavy duty vehicles that incorporates air pollutant emissions ("eurovignette directive")

-single choice reply-(optional)

Develop additional test-cycle components specific to the driving patterns of special purpose urban vehicles (e.g. buses and refuse collection vehicles), to ensure that pollution control technologies operate effectively under real urban driving conditions

-single choice reply-(optional)

Other (please provide comments in question 29)

-single choice reply-(optional)

No additional measures should be introduced

-single choice reply-(optional)

Don't know

-single choice reply-(optional)

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29. Please feel free to comment on your answers regarding regulation of road transport emissions: -open reply-(optional)

Sub-section 6.2: Off-road transport and non-road machinery

Extend the scope of application of current Stage IV NRMM standards to additional power classes and applications, including stationary applications -single choice reply-(optional)	
Introduce as soon as possible a more stringent Stage V standard for non-road machinery, aligned with the limit values of the most stringent Euro VI regulation for heavy duty road vehicles, which would further reduce especially PM emissions. -single choice reply-(optional)	
Ensure that approval emission tests reflect the machinery's emissions in real world circumstances -single choice reply-(optional)	
Ensure that there are incentives for retrofitting and/or replacing older inland waterway vessels' engines by newer and cleaner ones -single choice reply-(optional)	
Other (please provide comments in question 31) -single choice reply-(optional)	
No additional measures should be introduced -single choice reply-(optional)	
Don't know -single choice reply-(optional)	1
31. Please feel free to comment on your answers regarding regulation of emissions from off-road transport and non-road machinery: -open reply-(optional)	

Sub-section 6.3: Agricultural sector

Set tighter emission ceilings for ammonia for 2020 and 2030 in the NEC Directive, leaving flexibility to Member States on how these ceilings can best be reached -single choice reply-(optional)	
Where cost effective, introduce new or revise existing EU legislation to establish EU-wide specific rules for e.g. improved manure storage, management and spreading techniques -single choice reply-(optional)	
Promote good practices in manure management and manure spreading in Member States through support from the Rural Development Fund -single choice reply-(optional)	
Introduce measures to ban or restrict the burning of agricultural waste -single choice reply-(optional)	

Other (please provide comments in question 33)

-single choice reply-(optional)

No additional measures should be introduced

-single choice reply-(optional)

Don't know -single choice reply-(optional)

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33. Please feel free to comment on your answers regarding regulation of emissions from the agricultural sector: -open reply-(optional)

Sub-section 6.4: Small/medium combustion sector

34. Which additional measures should be taken to address air emissions from small and medium combustion installations (below 50 MW)? (Please choose one or more responses) -multiple

choices reply-(optional)

Other (please elaborate below)

35. Please feel free to comment on your answers regarding regulation of emissions from the small/medium combustion sector: -open reply-(optional)

Energy efficiency is a crucial element to ensure best performing and low-emission combustion installations. Up to 40% energy savings can be achieved with new oil boilers, which has an impact on reduced emissions.

Sub-section 6.5: Shipping sector

36. Which additional measures should be taken to address air emissions from the shipping sector? (Please choose one or more responses)

-multiple choices reply-(optional)

37. Please feel free to comment on your answers regarding regulation of emissions from the shipping sector: -open reply-(optional)

Final comments

38. Please feel free to provide any further comments related to the revision of the Thematic Strategy on Air Pollution: -open reply-(optional)

Energy efficient domestic heating contributes to an improved environmental protection, due to many factors: - New heating oil equipment, i.e. high-efficiency condensing boilers, increases energy efficiency and reduces emissions of Greenhouse Gases; - The more frequent use of low-sulphur fuels reduces the amount of emissions; - Liquid fuels have very low emissions of particulates (PM10 & PM2.5), SO_x, NO_x & carbon monoxide, preserving a high level of ambient air quality; - The industry has been conducting programmes and campaigns to raise customers' awareness and financially support the reduction of emissions together with energy efficiency gains (e.g. through heating system and building modernisation); - Heating oil presents the optimal conditions for integrating renewable energies, such as solar thermal heating; - Furthermore, high-efficiency oil heating systems are often the only possible and affordable source of energy in rural areas which are not connected to energy grids.