10 October 2018

Conclusions of the Clean Air Dialogue between Spain and the European Commission, taking place in Madrid on 8-9 October 2018.

The emissions of several air pollutants have decreased significantly since 1990 in Spain; however, air pollution continues to give cause for concern and has a significant health impact. For 2014, the European Environment Agency estimated that more than 23 000 premature deaths in Spain were attributable to fine particulate matter[1]. In addition, estimates indicate that air pollution has health-related costs in Spain of above EUR 22 billion per year, including the loss of 8 million workdays per year[2].

Commitment to clean air policy is therefore important and necessary, and will also contribute to the European Union's objectives to achieve levels of air quality that do not give rise to significant negative impacts on, and risk to, human health and the environment[3]; and specifically that outdoor air quality in the Union will move closer to levels recommended by the World Health Organization.

This Clean Air Dialogue has proven valuable in promoting a more detailed understanding of the approach to clean air policy in Spain, through the elaboration of specific national, regional and city-level policies and measures implemented. The Dialogue facilitated an informal and open exchange of views with relevant ministries, local authorities and stakeholders, on the successes and future challenges facing clean air policy in Spain and the inter-linkages with policies on agriculture, industry, transport, energy and climate change.

The Clean Air Dialogue with Spain concludes that:

1. Good governance

The responsibility related to air pollution and air quality in Spain is shared between the central administration, the regions and the local authorities. The various public administrations involved in the implementation of environmental law have a different level of financial and human resources available to undertake their tasks.

Good governance including better coordination among the different administrations and different ministries is essential to improve the clean air policy. This will also maximise the co-benefits of action in other areas including transport, energy, climate change and agriculture. Close cooperation on the National Air Pollution Control Programme with energy, climate, transport and agricultural policies is important to ensure that the policies are aligned, in order to ensure consistency and take advantage of all synergies.

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[1] EEA: Air quality in Europe — 2017 report

[2] These figures are based on the Impact Assessment for the European Commission Integrated Clean Air Package (2013).

[3] 7th Environment Action Programme to 2020 'Living well, within the limits of our planet'

Early and continuous involvement of the concerned stakeholders and transparency on upcoming measures and regulations are key to ensure effective implementation of mitigation measures and public acceptance.

Furthermore, it is important to keep in mind that objective, comparable and reliable air quality data and information is at the heart of being able to successfully engage stakeholders, manage air quality and achieve clean air.

2. Particulate matter

Residential solid fuel combustion continues to be the largest contributing activity to PM emissions with 40% of total $PM_{2.5}$ emissions in 2016.

The level of particulate matter emitted by open field burning of agricultural waste is high (26% of total $PM_{2.5}$ emissions in 2016).

The high level of emissions is reflected in the reported exceedances of EU air quality limit values for PM_{10} in ambient air.

Actions related to energy efficiency and energy renovation of buildings have been promoted, but there is an urgent need for planning further actions that can reduce emissions and improve air quality.

Meeting the EU air quality limit values for PM_{10} in ambient air and achieving the reduction commitments in 2020 and 2030 for $PM_{2.5}$ in accordance with the NEC Directive will require that actions at many levels are being analysed – and decided as appropriate - such as:

- Requirements on the quality of solid fuels used in households and related market surveillance.
- Further incentives to accelerate scrapping of sub-standard solid fuel stoves and boilers.
- Further incentives to promote systematic transfer to cleaner heating sources.
- Keep raising public awareness on the health impact of residential solid fuel combustion and operation techniques in private households, as well as on existing activities relating to energy efficiency.

A ban on open field burning of agricultural waste seems highly relevant, and could, for instance, be combined with incentive schemes and restricting biomass energy production to emission-controlled facilities.

Reducing air pollution from the residential sector is very closely connected to policies on energy renovation of buildings, including insulation and low- and zero-emission energy production and use. All of these measures can contribute to eradication of energy poverty as well.

Climate and energy-related policies in these and other areas offer important synergies and co-benefits for air quality as well. It would therefore be relevant for Spain to further incorporate air quality efforts in these and other relevant policies.

The development of a National Air Pollution Control Programme by April 2019 as required by the NEC Directive will be a relevant milestone for Spain to set coordinated directions for policies and actions on air quality, renewable energy and energy renovation.

Good progress has been observed in the last years with the revision of the BAT conclusions for several sectors. Early and continuous involvement of industry in future BAT revision work should be encouraged. Relevant experiences from other Member States in relation to BAT impact assessments and emission projections could be useful for Spain.

Relevant experience from other Member States can also be drawn upon more generally and be facilitated notably by the Peer-to-Peer tool under the Environment Implementation Review of the European Commission. The workshop in Madrid in November 2018 on air quality policy implementation related to ozone is a prime example on this.

3. Nitrogen oxides

EU air quality limit values are exceeded for NO_2 in several areas, posing a threat to public health in urban areas. It is relevant for Spain, concerned regions and major cities to accelerate the efforts to reduce emissions from the current and future fleet of vehicles, by taking the necessary measures in both short and medium-term at all administrative levels.

A mixture of policies utilised by other Member States should be considered in Spain, looking for example at fine-tuning low emission zones or other kinds of access restrictions for transport to the major cities; fiscal incentives to promote cleaner cars and modernisation of the current fleet, schemes supporting retrofitting of diesel vehicles to reduce emissions; incentives for promoting public transportation and non-motorized transport opportunities.

As emphasised previously by the European Commission in 2017 for the European Semester Report and the Environmental Implementation Report for Spain, the current imbalance of taxation between diesel and petrol for transport is not justified from an environmental perspective. Diesel fuel has a higher carbon and energy content than petrol, and its use leads to higher emissions of several pollutants, and should not be favoured by the taxation regime.

Often measures on greenhouse gas emissions, urban mobility and congestion management (e.g. charges) will also reduce air pollution. It is therefore relevant to use policies in these areas also as drivers for air quality improvements. Pursuing such synergies will also enhance the uptake of available national and EU funding for the reduction of air pollution.

4. Ammonia

Agricultural production in Spain is expanding, which might challenge the reduction path for ammonia and will need close attention.

Ammonia emissions not only have a long-term impact on nature, but they can also have a short-term effect on human health. According to the European Environment Agency, a number of studies have confirmed that, through reactions in the atmosphere, ammonia emissions from agriculture contribute to episodes of high particulate matter (PM) concentrations experienced across certain regions of Europe. This also leads to exceedances of the PM_{10} daily limit value set in the Air Quality Directive.

It is relevant for Spain to promote more measures that reduce ammonia emissions, such as low cost manure management techniques, in order to secure the necessary results and improvements. Ammonia reductions need to be factored into further development plans and projections, also bearing in mind that the implementation of such measures can generate economic benefits for the farmers, beyond health and environmental ones. A National Code of Good Agricultural Practices – as required by the NEC directive - would be an important step for this.

Vast experiences are available from other Member States on regulations and mitigation techniques that would be useful for Spain to consider and take inspiration from. The Peer-to-Peer tool of the European Commission is available to support the transfer of experiences between Member States by the direct involvement of experts from Member States.

Reduction of ammonia is closely linked with efforts to reduce greenhouse gases and nitrates from the agricultural sector. Synergies and co-benefits should therefore as far as possible be

promoted, also having in mind that measures reducing emissions of nitrogen to the air can in some cases result in increased emissions of nitrogen to the aquatic environment and vice-versa, which should be avoided.

Existing funding under the Rural Development Programme is available to support measures that directly or indirectly reduce ammonia. Pursuing co-benefits between competitiveness enhancement, technological development and environmental protection is possible in manure management including spreading and animal husbandry technologies funded by the Programme.

The first National Air Pollution Control Programme will be an opportunity to demonstrate the capability to combine growth and expansion of the agriculture sector with a cost effective pathway for reducing ammonia emissions. In this framework, a forward looking focus on the 2020 and 2030 obligations will be kept regarding ammonia emissions compliance, despite the recurrent exceedance of the 2010 ceiling.

5. Ozone

Spain is facing severe challenges from ozone concentration levels, exceeding the EU target values and harming health and agricultural production. The complexity of the chemical process that triggers ozone concentrations, requiring action on ozone precursors – in particular NO2 and VOCs – was highlighted during the dialogue.

Spain's efforts to improve knowledge and understanding of the issue in view of more effectively targeted policy responses are positive steps. In particular, Spain's active role in sharing experiences across Member States through the TAIEX/EIR-Peer 2 Peer supported workshop to be held in Madrid on 21-22 November 2018 – and co-organised with France - is appreciated.

6. Air quality monitoring

Good air quality management depends on an effective air quality monitoring system. Member States need to ensure that regular reviews of the monitoring network are carried out to ensure that the sampling sites remain valid over time in accordance with the requirements of Ambient Air Quality Directive. This includes that they are spatially representative, providing measurements in areas where the highest concentrations occur as well as measurements in areas, which are representative of the exposure of the general population.

This is fundamental to robust air quality assessment and management and for the dissemination of reliable real-time information to the public on the current air quality status.

The European Commission pays a particular attention to the need for maintaining a solid air quality monitoring network.

Member States should exchange best practices to improve and/or expand the current monitoring network and related air quality modelling capacity when needed, including public consultation of the plan to secure broad input and acceptance.