Danish comments and suggestions for revision of the Air Quality Directives

Suggested changes to the directive is marked with track changes.

Definitions

(3) 'level' means the measured or modelled concentration of a pollutant in ambient air or the deposition thereof on surfaces in a given time;

Rationale:

The role of modelled results is somewhat unclear. Commission confirmed that both would be relevant and the definition should reflect this.

(4) 'total deposition' means the total mass of pollutants which is transferred from the atmosphere to surfaces, such as soil, vegetation, water, buildings, in a given area within a given time;

We intervened on deletion of 'Bulk' before deposition, but it seems that this is not an issue.

(13) 'black carbon' (BC) means equivalent black carbon (eBC) derived from optical methods.

Rationale:

Single quotes are used all other places.

(13b) 'elemental carbon' (EC) means concentration of carbon derived from thermal measurement methods.

Rationale:

Elemental carbon is reference six times in the annexes and should be defined.

(13c) "particulate matter oxidative potential" means the capacity of airborne pollutants to oxidize target molecules by generating redox oxidizing.

Rationale:

Its not a genarally known term and should be defined as its used later on in the text. Definition could include some reference to prefered measurement principle.

(14) "ultrafine particles" (UFP) means the particle number concentrations in cm³ within a defined size range

Rationale:

There is no standard yet for UFP measurements. The exact cut of sizes should not be set before development of the standard, but rather be left open for change.

(21) 'objective estimation' means an assessment method to obtain quantitative or qualitative information on the concentration or deposition level of a pollutant through expert judgement, which may include use of statistical tools, remote sensing, measurement of other correlating pollutants and in-situ sensors;

Rationale:

Meusurement of other pollutants is often a good way to estimate air pollution levels. One example could be measuring carbonmonooxide to estimate benzene levels from.

Article 5

Responsibilities

(d) ensuring the accuracy of air quality modelling applications;

Rationale:

A wide range of modelling would go into assisting the air quality monitoring and making air quality plans. However, the responsibility here shoud be directed towards air quality models, and not models in general.

Article 6

Establishment of zones

For the purposes of air quality assessment and management, Member States shall for each pollutant establish zones within each territorial unit at NUTS 1 level throughout their territory. Air quality assessment and air quality management shall be carried out in all zones.

Rationale:

The general purpose of the establishment of zones is to assist in air quality management. This should be reflected. There is no special benefit in the mentioning of agglomerations, thus it can be deleted. Current interpretation is that zones can be different for different pollutants. This

should be reflected for clarity. The addition of NUTS1 level requirement would make sense in order to have some logic in the zoning. It could be considered if there should be an upper size limit on [number of?] zones. Annexes list requirements in intervals up to 6 million and above.

Article 9

Sampling points

3. For zones where the level of pollutants exceeds the relevant assessment threshold specified in Annex II, but not the respective limit values specified in Table 1 of Section 1 of Annex I, ozone target values specified in Section 2 of Annex I or critical levels specified in Section 3 of Annex I, the minimum number of sampling points may be reduced by up to 50 %, in accordance with Points A and C of Annex III provided that the following conditions are met:

(a) indicative measurements and modelling provide sufficient information for the assessment of air quality with regard to limit values, ozone target values, critical levels, information thresholds and alert thresholds, as well as adequate information for the public, in addition to the one provided by the fixed sampling points;

(b) the number of sampling points to be installed and the spatial resolution of indicative measurements and modelling techniques are sufficient for the concentration of the relevant pollutant to be established in accordance with the data quality objectives specified in Points A and B of Annex V and enable assessment results to meet the requirements specified in Point D of Annex V;

Rationale: Suggest deleting condition (c). This condition removes the incentive to do modelling as a supplement to measurements as the overall cost og modelling and indicative measurements would match the cost of just measuring with any reduction in the number of stations. Indicative measurements would either have very low information value (e.g. low cost sensors) or they would be almost as costly as doing a full measurement programme. Also indicative measurements is not available for all pollutants. In most cases the requirement would simply mean that instrustruments would have to be circled around producing results of relative low quality.



Council of the European Union General Secretariat

Interinstitutional files: 2022/0347 (COD) Brussels, 24 February 2023

WK 2492/2023 ADD 2

LIMITE ENV ENER IND TRANS ENT SAN AGRI CODEC

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on the Environment
Subject:	Air Quality Directive: follow-up to the meeting on 23 January - comments by a delegation

Following the call for comments (WK 1161/23), delegations will find attached the contribution received from the DK delegation.