



Council of the European Union
General Secretariat

**Interinstitutional files:
2022/0347 (COD)**

Brussels, 22 May 2023

WK 6426/2023 ADD 3

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on the Environment
N° Cion doc.:	ST 14217/22 + ADD 1
Subject:	Air Quality Directive: follow-up to the WPE on 8 May 2023 - comments by a delegation

Following the call for comments (WK 5892/23), delegations will find attached the contribution received from the PT delegation .

PORTUGAL

Air Quality Directive: follow-up to the WPE on 8 May 2023

Call for Comments

Following the invitation by the Presidency at the WPE on 8 May, PT is hereby submitting concrete text proposals on Article 8

1. Assessment criteria (Article 8 paragraph 3)

In our view indicative measurements should be considered instead of modeling applications where appropriate, allowing Member States to adapt to the use of modeling for the purpose of assessing air quality, in areas where exceedances of the Limit Values of the various pollutants and the Value Target for ozone occur, and allowing time to improve for local scale application.

Certain pollutants like arsenic, cadmium, nickel and PAH, modelling applications are still limited and require specific input information (like PM chemical composition). Therefore indicative measurement are more suitable and provide an alternative to Member States.

Against this background, we propose the following amendments to paragraph 3 of article 8 of proposal COM 542 Final, marked in bold:

“3. In all zones where the level of pollutants exceeds a limit value established for those pollutants in Table 1 of Section 1 of Annex I or an ozone target value established in Section 2 of Annex I, modelling applications **or indicative measurement as appropriate** shall be used in addition to fixed measurements to assess the ambient air quality.

Those modelling applications **or indicative measurements as appropriate** shall also provide information on the spatial distribution of pollutants and on the spatial representativeness of fixed measurements.”

2. Requirements on the measurement of ultrafine particles (Article 4 Point 14, Article 8 paragraph 7, Annex III Point D and Annex VII Section 3)

We agree with the inclusion of black carbon in paragraph 7 of article 8.⁹ as a regular measurement parameter and in conjunction with the measurement of ultrafine particles.

Black carbon measured by optical methods is relatively economical both in terms of equipment and operating costs. We consider there is an added value to measure this component simultaneously with ultrafine particles, especially in places where the influence of emissions resulting from combustion may occur.

Since knowledge of this pollutant is relevant in terms of air quality policy, due to its effects on health, and in climate policy due to its radiative effect, we regard black carbon as an important indicator in terms of the chemical composition of the fraction of inhalable particles.

Consequently we propose the following amendments to paragraph 7 of article 8 of proposal COM 542 Final, marked in bold:

*“7. In addition to monitoring required under Article 10, Member States shall, where applicable, monitor ultrafine particles levels **or black carbon levels (BCe)**,.....”*

Note: To accommodate this proposal it will be necessary to suit the content of Point D of Annex III and Section 3 of Annex VII.
