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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 15 June 2023 - comments by a delegation

Following the call for comments (WK 8189/23), delegations will find attached the contributions received from the IE delegation.

IRELAND

Please find below comments from IE on some of the items covered in the WPEs held on June 6 and June 15. We are still scrutinising most aspects of the proposal and reserve the right to add further comments at a later date.

Article 3 Regular Review

Paragraph 1: We prefer to keep the original review date of 2028 as this allows some time before the new limit values come into force in 2030.

Paragraph 2: We support the suggestion by NL that a reference should be made to the UNECE Convention on Long Range Transboundary Air Pollution (CLRTAP) so that all relevant scientific advice and guidance can be incorporated into the review process.

Article 4 Definitions

11. Volatile Organic Compounds (VOC): We welcome the inclusion of methane as this is an extremely important VOC and increased monitoring will help to better understand its contribution to the formation of ground level ozone. We point out that although methane is covered under climate legislation and the UNFCCC process, it is only covered as a greenhouse gas and in combination with CO₂ and N₂O and not as an air pollutant. The proposal made by AT that methane not be included in the definition of VOC but that text be added to Article VII to promote greater monitoring of methane is also acceptable.

14. Ultrafine particles (UFP): We agree with the compromise text setting a defined lower limit as this will allow for greater comparability between measurements. This is also in agreement with the recommendations made by ACTRIS.

Article 10 Monitoring Supersites

Paragraph 4a: We welcome the PRES proposal to detail the pollutants in new tables in Annex VII rather than in the text of the article - this is a much cleaner solution. We agree with the streaming of pollutants into the three tables as this allows for greater flexibility when assigning monitoring resources. We also agree with the addition of levoglucosan and nitric acid compared to the original proposal. Regarding the text in Paragraph 4a and with a view to promoting monitoring of emerging pollutants, we suggest replacing “may also include the pollutants listed in Table 3...” with “Member States are encouraged/strongly encouraged to include some or all of the pollutants in Table 3”.

Annex I Section 2 – PODY

We welcome the question raised by PRES on the most suitable metric for ozone. While we agree that PODy is a more meaningful and informative metric than AOT40, calculating it requires more input parameters and would increase the admin burden on MS. It may also require some additional amendments to the Directive which may be outside the scope of the recast. So it is probably best to stick with AOT40 in the recast.

Article 15 & Annex I Section 4, Point A - Exceedances of alert or information thresholds

Regarding the duration of measurement of PM₁₀ and PM_{2.5} we favour the COM proposal of 3 days.

Article 23 - Transmission of information and reporting

We favour maintaining the current 9 month reporting deadline. A shorter timeline would be very onerous from an administrative and technical point of view for very little gain.
