6 July 2017

Conclusions of the Clean Air Dialogue between Luxembourg and the European Commission, taking place in Luxembourg on 29-30 June 2017.

Luxembourg has made significant progress in reducing air pollution and improving air quality, to the benefit of public health and welfare, the environment and its ecosystems, as well as reducing costs to society resulting from air pollution.

However, air pollution still has a significant health impact in Luxembourg and projected growth in transportation and economic activity will likely increase emissions. For 2013, the European Environment Agency estimated that more than 300 premature deaths in Luxembourg were attributable to fine particulate matter and other air pollutants. In addition, estimates indicate that air pollution has health-related costs in Luxembourg of above € 850 million per year, including the loss of 98,000 workdays per year.

The continued commitment to clean air policy is therefore important and necessary. This commitment is consistent with, and will 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; and specifically that outdoor air quality in the Union will move closer to levels recommended by the World Health Organization. It will also contribute to EU climate action objectives, for example, through efforts to reduce black carbon and formation of ground level ozone, as well as indirect effects on greenhouse gases.

This Clean Air Dialogue has proven valuable in promoting a more detailed understanding of the approach to clean air policy in Luxembourg, through the elaboration of specific national policies and measures implemented in Luxembourg; the Dialogue facilitated an informal and open exchange of views on the successes and future challenges facing clean air policy in Luxembourg and the inter-linkages with other EU policies such as agriculture, transport and energy and climate change. It also provided insights on options for enhancing the efforts in Luxembourg based on wider experiences, including from other Member States, which could be facilitated through the upcoming peer-to-peer tool under the EU Environmental Implementation Review.

The Clean Air Dialogue with Luxembourg concludes that:

1. Nitrogen Dioxide (NO\textsubscript{2}) levels are, at some local hotspots, persistently above agreed EU air quality standards, valid since 2010. Overreliance on road transportation and in particular diesel cars means these levels continue to be a problem in Luxembourg. The long-term efforts to promote alternative, public transport modes are essential steps (including a new tramline and the programme Mobilité Durable (Modu).

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2 7th Environment Action Programme to 2020 ‘Living well, within the limits of our planet’
However, there is a need for short-term actions that can contribute to the immediate reduction of NO$_2$ concentrations in Luxembourg. The measures included in the national air quality programme, agreed in June 2017 by the Government of Luxembourg in combination with awareness-raising measures (Climate Pact) are actions that aim to reduce these NO$_2$ levels.

In addition to this, implementation of measures, in line with the long term strategies, that combine lower polluting emissions and accelerating the transition to a low-carbon economy, reducing overall traffic volumes and congestion, incentivise use of cleaner fuels and low emission vehicles as well as changing transport habits, should continue to be prioritised. In this context, further reducing the numbers of diesel-powered vehicles as well as continued efforts to reduce emissions from busses at city hot spots, are important step towards achieving compliance with EU air quality standards.

Effective measures will need to take into account the specifics of air pollution and its sources in Luxembourg, which includes a relatively large share of emissions attributable to commuters.

As also raised by the European Semester report for Luxembourg$^3$, it is relevant to continue and strengthen efforts taken by Luxembourg to reflect on the transport taxes. The developments in transport efficiency, air pollution, traffic congestion and provision of housing should go hand in hand, and be fully supported by transport and fuel taxes. The Dialogue confirmed the need for a broad, cross-governmental discussion on these matters.

2. Although emissions of Particulate Matters (PM) from domestic woodstoves and boilers are less than those from industry, energy and transport in Luxembourg, it is still relevant to focus on ways to further reduce PM emissions from these sources and at the same time address local problems like neighbour complaints over smoke from domestic wood combustion for heating.

Limit values for new stoves are regulated already ahead of the eco-design requirements starting from 2020, which is positive and commendable.

Synergies and co-benefits from ambitions on clean energy and clean air should be pursuit, but possible negative impacts of biomass on emission of PM should also be assessed.

Clean energy sources for domestic heating should continue to be integrated into the promotion of sustainable construction, energy efficient buildings and renewable energies in the housing sector.

3. Agricultural production in Luxembourg shows an increasing trend as regards milk production, which might challenge the reduction path for ammonia and will need close attention. The first national air pollution control programme to be finalised by April 2019 under the revised NEC Directive, will be an important milestone for Luxembourg to demonstrate its capability to combine competitiveness and expansion in the agriculture sector with a pathway of reducing ammonia emissions based on a solid emission inventory.

Reduction of ammonia is linked with efforts to reduce greenhouse gases and nitrates from the agricultural sector. Synergies and co-benefits should as far as possible be promoted. In addition, the implementation of some of the measures for ammonia reduction would also have economic benefits for the farmers. Consequently, the spending under the Rural Development Programme could be better targeted.

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$^3$ https://ec.europa.eu/info/publications/2017-european-semester-country-reports_en
Luxembourg has done efforts for many years to reduce ammonia emissions through the Rural Development Program and schemes to support mitigation measures are largely in place. However, there is a need to further promote relevant and needed measures, as for example the use of near-ground spreading techniques as well as measures for manure storage with reduced ammonia emissions, in order to secure the necessary results and improvements. The farmers called for communication with the sector, and specialized advice in the field of the reduction of ammonia emissions in general.

The possible use of direct regulation should be considered to safeguard the needed action.

It will be relevant to seek further inspiration from the successful experiences of other Member States on regulation, management and mitigation of ammonia emissions, Seeking guidance and advise from other Member States on how to quantify measures in the emissions inventory will be relevant, in order to establish a solid emissions inventory for ammonia too.

4. The Commission encourages Luxembourg to make full use of the EU funding mechanisms, including the LIFE programme (both traditional projects and Integrated Projects), and to maximise synergy effects between objectives in the Rural Development Programme and the Operational Programmes under the Structural Funds with air quality and emission reduction objectives in Air Quality Plans and the National Air Pollution Control Programme. Interreg could also provide opportunities.

For future use of EU funding, Luxembourg could consider priority axes and investment priorities with air quality as the primary objective under the Thematic Objective for the environment in addition to those which include air quality as a co-benefit under the Thematic Objective for the transition to a low carbon economy.

Results from past or on-going projects under the LIFE programme and under research programmes such as FP7 and Horizon 2020 could provide contacts throughout Europe and inspiration for concrete actions in Luxembourg.

5. Good governance including stakeholder involvement is essential to effective clean air policy formulation, so as to maximise the co-benefits of action in other areas including in transport, climate change and agriculture; and to increase public acceptance of necessary transitions and trade-offs. Societal adjustments will be more effectively achieved when close coordination of policies and co-benefits is being pursued.

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

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.

To deliver changes on the ground and maximise the potential of existing legislation, efforts should continue to be made to ensure effective implementation and enforcement.