

OPINION
of the European Union Affairs Committee
of the Senate of the Republic of Poland
on the proposal for a Directive of the European Parliament and of the Council
on the reduction of national emissions of certain atmospheric pollutants and amending Directive
2003/35/EC
COM(2013)920
adopted at the meeting on 12 February 2014

1. The European Union Affairs Committee (EUAC) supports efforts aimed at limiting air pollution to improve human health and the environment, at the same time emphasising the need to adapt them to the social and economic situation as well as the financial capabilities of individual Member States.
2. EUAC has reservations concerning some of the provisions of the proposed Directive of the European Parliament and of the Council on the reduction of national emissions of certain atmospheric pollutants and amending Directive 2003/35/EC.
3. In EUAC's opinion, the reduction commitments for 2030 applicable to individual pollutants are too high and will involve incommensurately large costs, which may be considered contrary to the principle of proportionality.
4. EUAC notes that the agricultural sector will be particularly exposed to the risk of high costs, as it would need to make an exceptional investment effort and take expensive reorganisation measures to implement the requirements following from Annex III. Due to the fragmentation of agriculture in Poland, limiting the emission levels of methane and ammonia from animal production in other ways than by reducing the livestock will be difficult to achieve.
5. According to EUAC, the administration and inspection tasks following from additional duties to monitor the effects of pollutant emissions will result in increasing administrative costs and the costs of research, analysis and data collection.
6. In EUAC's opinion, it would be wrong to amend the annexes by way of delegated acts. The contents of the annexes constitute an essential element of the act, and so should be amended by a legislative act.
7. EUAC calls for extending the period for transposing the Directive from 18 to 24 months.