

### **Position Paper**

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# **Position Paper**

In a nutshell

Eurovent holds that gap between the AAQ Directives and the WHO guidelines on PM2.5 must be closed, that air quality data must be disseminated to the public more effectively, and that ambient air quality legislation must be complemented with policies addressing indoor air pollution as well.

## Background

The 2019 fitness check of the AAQ Directives concluded that they have been 'partially effective in achieving their overall objectives' with important challenges remaining. In the below, Eurovent outlines its position on how to further improve the AAQ Directives, protect the right to clean air for everyone, curb air pollution wherever it occurs, and limit the harm it is known to cause.

## Air quality standards

The gap between the AAQ Directives and the stricter WHO air quality guidelines must be closed, especially for fine particulate matter. PM2.5 pollution has the most significant known health impact on aggregate of any air pollutant. Almost three-quarters of the European population is reported to still live in areas that do not meet the stricter WHO air quality guideline for PM2.5 of 10 µg/m<sup>1</sup>.

## Monitoring

The AAQ Directives have been crucial in ensuring that reliable and representative air quality measurement data is made available. Public awareness of air quality data remains limited though. More must be done to ensure that every citizen knows about the air quality in their area, and its potential health consequences. For everyone to be able to take appropriate steps to mitigate their exposure to air pollution and the associated risks, they must be first be made aware of the problem.

## Indoor air pollution

Tackling air pollution requires a comprehensive approach that goes beyond limits for certain pollutants in the ambient air. The AAQ Directives must be complemented with policies that limit emissions at source, and reduce pollutant concentrations indoors as well.

People spend more than 90% of their time indoors, where the air can be as much as eight times more polluted than the ambient air. Minimum indoor air quality requirements should be included in the EPBD during its upcoming review, in line with the European Parliament report on maximising the energy efficiency potential of the EU building stock (2020/2070(INI))<sup>2</sup>.

In this context, it is important to note the synergies between decarbonisation and air quality. Most air pollution comes from the combustion of fossil fuels in powerplants, industry, vehicles, and households<sup>3</sup>. Increased deployment of renewable energy, improvements in energy efficiency, better sector integration and more electrification of end-uses would result in air quality improvements as well. Air quality objectives should be made more explicit in the reviews of the RED, EED and EPBD.

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<sup>&</sup>lt;sup>1</sup> <u>https://aqli.epic.uchicago.edu/wp-content/uploads/2020/07/EuropeFactSheetv2.pdf</u>

<sup>&</sup>lt;sup>2</sup> <u>https://www.europarl.europa.eu/doceo/document/A-9-2020-0134\_EN.pdf</u>

<sup>&</sup>lt;sup>3</sup> <u>https://dev-aqli-epic.pantheonsite.io/pollution-facts/</u>

**Eurovent AISBL / IVZW / INPA** European Industry Association EU Trans. Reg.: 89424237848-89

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## **Eurovent and transparency**

## When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

### 1. Who receives which number of votes?

### 2. Who has the final decision-making power?

At Eurovent, the number of votes is never determined by The Eurovent Commission acts as the association's organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same roadmap, makes decisions on horizontal topics, and number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.

3. How European is the association?

More than 90 per cent of manufacturers within Eurovent Eurovent represents more than 1.000 companies of all manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation. national outreach also to remote locations.

'steering committee'. It defines the overall association mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.

### 4. How representative is the organisation?

sizes spread widely across 20+ European countries, which are treated equally. As each country receives the secondary sector. Our structure as an umbrella enables same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging

Check on us in the <u>European Union Transparency Register</u> under identification no. 89424237848-89.

## We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds indepth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.

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