



EEB

European
Environmental
Bureau

Green Transition Denmark webinar – air quality in the EU

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Who are we?

The EEB is **Europe's largest network of environmental citizens' organisations, with over 190 members from 41 countries** – working on a broad range of issues.

Our members have more than 30 million individual supporters.

Our vision

A better future where people and nature thrive together.

Our mission

We advocate for progressive policies to create a better environment in the European Union and beyond.



EEB's work on Air Quality



Horizontal EU instruments:

- Ambient Air Quality Directive
- National Emission reduction Commitments Directive
- Key policies (including Zero Pollution Action Plan)

Source legislation:

- EcoDesign standards for heating appliances
- Relevant agricultural policies and legislation (focus on ammonia and methane)

International:

- Long-Range Transboundary Air Pollution Convention (Gothenburg Protocol)



Zoom into the NECD

- The National Emission reduction Commitments Directive entered into force in 2016.
- It establishes the reduction of overall national emissions of 5 air pollutants - PM_{2.5}, NO_x, SO₂, NMVOCs, NH₃ – by the year 2020 and 2030, having 2005 as baseline year; through National Emission Reduction Commitments (NERCs)
- Its overall objectives are to cut premature deaths due to air pollution by -55% and to reduce the area of EU ecosystems threatened by air pollution by 25% by 2030, both compared to 2005 levels.
- Between the two sets of targets Member States have the obligation to maintain a linear trajectory – if this is not going to be the case they will have to implement additional measures to fix this



How to achieve the targets?

How are the targets going to be achieved?

- Starting from 1 April 2029, Member States have to produce their own **National Air Pollution Control Programme - NAPCP** (respecting public participation rules) to identify and adopt the measures that they will put in place to deliver on the different targets – showing compliance.
- The NAPCP is to be updated every 4 years at the latest, and any time there is a risk of any NERCs not being complied with.
- The European Commission has issued a Guidance on how to formulate NAPCPs and also a specific form to be used (mandatory) for it, also to facilitate comparability in time and among MS.



Assessing compliance

- Member States are requested to build and maintain national emission inventories following a specific methodology. Accuracy of these inventories can change (Tier 1,2,3) but this will not affect the validity of the emission reduction obligations.
- Every year in February Member States are requested to submit to the EC their Emission Inventory. It provides information on the emissions levels for the year-2 (this year MS have reported emissions of 2023).
- The EC has to regularly review national emission inventories and verify their transparency, accuracy, consistency, comparability and completeness, with the help of the European Environmental Agency. The EC has the power to mandate technical corrections.



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Flexibilities

How is compliance assessed?

- BUT Member States have the possibility to adjust their inventories (because of a new source), indirectly favouring compliance. This will have to be indicated in their Informative Inventory Report (IIR).
- Can also make use of three other flexibility tools:
 - 3-year averaging
 - pollutant swapping
 - Exceptional events due to the energy sector



Acting to prevent the breach

How is compliance assessed?

Despite the co-legislator generosity in allowing the introduction of several flexibility tools, compliance can also be assessed (and secured) based on **projections** prepared by Member States every 2 years.

Action can be taken not only once a breach is there, but when there is a risk for the reduction targets not to be met, Member States have the obligation to update the NAPCP.

Member States also have to monitor the impacts of air pollution on ecosystems (reporting every 4 years).



Status quo

Where are we in the EU?

Legally binding NERCs were to be achieved in 2020.

EEA: 'In 2022, 16 Member States met their respective 2020-2029 national emission reduction commitments for each of the five main air pollutants, while 11 Member States failed to do so for at least one of five main air pollutants'. The majority of these MS are in breach of their 2020 ammonia target.

14 infringement procedures are open at the moment. The Commission sent letters of formal notice to Bulgaria, **Denmark (INFR(2022)2070) on NH3**, Ireland, Spain, Cyprus, Latvia, Lithuania, Luxembourg, Hungary, Austria, Poland, Portugal, Romania, and Sweden.

Table 1. EU Member States' percentage emission reductions compared with 2020 levels to meet their emission reduction commitments for 2020-29 and 2030 onwards

Country	2020					2030				
	NH ₃	NM VOC	NO _x	PM _{2.5}	SO ₂	NH ₃	NM VOC	NO _x	PM _{2.5}	SO ₂
Austria	●	✓	✓	✓	✓	●	✓	●	●	✓
Belgium	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Bulgaria	●	✓	✓	✓	✓	●	●	✓	●	✓
Croatia	✓	✓	✓	✓	✓	●	●	●	●	✓
Cyprus	✓	✓	✓	✓	●	●	✓	●	●	●
Czechia	✓	✓	✓	✓	✓	●	●	●	●	✓
Denmark	●	✓	✓	✓	✓	●	✓	●	●	✓
Estonia	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Finland	✓	✓	✓	✓	✓	✓	●	✓	✓	✓
France	✓	✓	✓	✓	✓	●	✓	●	●	✓
Germany	✓	✓	✓	✓	✓	●	✓	●	●	●
Greece	✓	✓	✓	✓	✓	✓	✓	✓	●	✓
Hungary	●	✓	✓	●	✓	●	●	●	●	●
Ireland	●	●	✓	✓	✓	●	●	●	●	✓
Italy	✓	✓	✓	✓	✓	●	●	●	●	✓
Latvia	●	✓	✓	✓	✓	●	✓	✓	●	✓
Lithuania	●	●	●	✓	✓	●	●	●	●	✓
Luxembourg	●	✓	✓	✓	✓	●	✓	●	✓	✓
Malta	✓	✓	✓	✓	✓	✓	✓	●	●	✓
Netherlands	✓	✓	✓	✓	✓	●	●	●	✓	✓
Poland	✓	●	✓	✓	✓	●	●	●	●	●
Portugal	●	✓	✓	✓	✓	●	●	●	●	✓
Romania	✓	✓	●	●	✓	●	●	●	●	✓
Slovakia	✓	✓	✓	✓	✓	●	✓	✓	✓	✓
Slovenia	✓	✓	✓	✓	✓	●	●	●	●	●
Spain	●	✓	✓	✓	✓	●	●	●	●	✓
Sweden	●	✓	✓	✓	✓	●	✓	●	✓	✓
EU-27	✓	✓	✓	✓	✓	●	●	●	●	✓





NECD review and possible revision

The European Commission started a NECD review in late 2024, which has to be concluded by 31 December 2025.

A decision on the need to revise or not the Directive is expected in December, during the EC Clean Air Forum in Bonn.

Challenging political context – deregulation. At the same time science is clear and additional targets are needed to drive action beyond 2030.



NECD review and possible revision

EEB's main priorities, as identified during the NECD consultation exercise at the end of 2024:

- Expand the scope to establish reduction targets for black carbon, mercury and methane.
- Reduce the number of flexibilities
- Establish a clear timeline for NAPCPs update
- Ambitious targets for the already covered pollutants
- Special focus on agri specific pollutants, ammonia and methane

➔ Ongoing revision of the Gothenburg Protocol. Deserving one additional presentation.



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Thanks for listening!

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Keep in touch

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