

International Society of Doctors for the Environment

Linking Human Health and the Environment

Basel, March 13th, 2006



ISDE Europe declaration on the new ambient air quality directive (COM(2005) 447)

As medical doctors we are deeply concerned about the health effects of urban air pollution. Studies conducted world-wide as well as in Europe prove adverse effects of current air pollution levels on pregnancy outcomes, child health and adult mortality.

We are aware of the fact that air quality guidelines are only one important step in protecting the air we breathe and thus the health of our children and fellow citizens. Strict emission control (e.g. EURO 5 norm for cars) is also necessary.

However, we will now focus on the Thematic Strategy on Air Pollution and the EU legislative proposal of a more comprehensive directive on ambient air quality. Many studies document that existing limit values (especially for PM10: 50 µg/m³ daily mean, 40 µg/m³ annual mean) are not protective for health and therefore we would support an even more stringent limit value especially for the annual mean. However, we realize that the current values initiated member states to introduce political, technical and legislative measures in many urban regions to comply with the limit values. Thus, the current limit values are able to enforce protective measures and are feasible.

But the proposed new directive does weaken the existing limit values by increasing the measurement uncertainty, allowing for subtracting of PM10 from "natural sources", and introducing new derogations for meeting the limit values. While in the current directive it is foreseen to strengthen the limit value for the annual mean of PM10 by 2010 (from 40 to 20 µg/m³) this important goal necessary for health benefits is missing in the new proposal. In exchange the proposed directive adds a new limit value for PM2.5 (25µg/m³) which is much too high compared with the PM10 standards and does not consider the cumulating evidence on adverse health effects of the finer particle fractions.

Both coarse and fine fractions of particulate air pollution and short term as well as chronic exposures are relevant indicators for the population health. In view of the serious health effects of air pollution and the high burden of disease and economic costs caused by these impacts none of the limit values must be weakened! Therefore we appeal to the European parliament to vote for a tight ambient air quality directive that is in line with current WHO recommendations:

PM2.5: 10µg/m³ annual mean, 25 µg/m³ daily mean (99th percentile)

PM10: 20µg/m³ annual mean, 50 µg/m³ daily mean (99th percentile)

"[These limit values] are recommended to be achieved everywhere in order to significantly reduce the adverse health effects of pollution."

(WHO, 2006: <http://www.euro.who.int/Document/E87950.pdf>)

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