

To: Executive Vice-President Ribera, Commissioner Roswall, Commissioner Dombrovskis.

Brussels, 8 December 2025

Subject - Environmental omnibus and pollutants emissions: Uphold and strengthen the existing EU clean air framework for better health

Dear Executive Vice-President Ribera,
Dear Commissioner Roswall,
Dear Commissioner Dombrovskis,

As the Commission is about to publish the “environmental omnibus”, the EU Healthy Air Coalition ([EUHAC](#)), a coalition bringing together nonprofit health expert voices in the EU to advocate for better health for all through clean air, urges you to uphold and strengthen all EU requirements on the reduction and prevention of emissions of air pollutants, as well as reporting obligations in the existing EU clean air framework.

The EU Healthy Air Coalition reiterates [our call](#) on the EU to speed up action to reduce and prevent air pollution emissions from all sources.

The persistent disease burden from air pollution and the need for prevention

Air pollution remains the top environmental risk to health in Europe, resulting in hundreds of thousands of premature deaths and hundreds of billions of euros of costs annually. Air pollution is a cause of all major non-communicable diseases, including cardiovascular and respiratory diseases, stroke, diabetes, dementia, and lung cancer, as well as acute respiratory infections, with growing evidence on adverse impacts on mental and neurological health.

The disease burden caused by air pollution is substantial and underestimated.

As evidenced by the *Health risks of air pollution in Europe* ([HARPIE-2](#)) guidance that was just updated by the World Health Organisation (WHO), evidence on health effects of air pollution has increased significantly in the last few years. The evidence on PM_{2.5}, NO₂ and ozone exposure as a cause of premature mortality has been solidified again, and the disease burden of air pollution is larger than previously estimated.

Yet as repeatedly highlighted in the [Clean Air Outlook](#), most of the health and economic impacts of air pollution are preventable by major emissions reductions and prevention. Moreover, measures to improve air quality can be a win-win for both health and climate mitigation and adaptation, and help relieve the burden on increasingly strained health care systems.

EU emission reduction requirements have been beneficial, but further efforts needed by member states

In the December 2025 review of the National Emission reduction Commitments Directive (NECD) the Commission just [concluded](#) that EU clean air policy works, that clean air policy benefits – worth at least €372 billion over the period from 2016 to 2025 – exceed pollution reduction costs by at least a factor of 4-to-1.

The assessment also shows that EU clean air policies and economic growth are decoupled, given that emission reductions were achieved while the EU economy grew.

However, the NECD review also highlighted that further efforts on emission reductions are needed for the EU member states to achieve 2030 commitments.

Among key lessons learnt, the Commission considers that most compliance challenges relate to reducing ammonia emissions, 94% of which stem from the agricultural sector. Among the possibilities to improve compliance and reap the linked benefits in the period leading up to 2030, the Commission identified a range of measures, relating especially to full implementation of the revised EU's Industrial Emissions Directive (IED) and funding needs.

Strengthen the implementation and enforcement of EU clean air law

In view of the persistent health threat from air pollution and the significant health costs from poor air quality, the EU Healthy Air Coalition considers it paramount that the existing EU framework on air pollution reduction and prevention is upheld.

Instead of prioritizing the reduction of administrative burden, the Commission should double down on the implementation and enforcement of existing legislation, including through providing adequate funding for clean air in the next EU budget.

We thank you in advance for considering our call and would be happy to meet with your relevant cabinet and service members to provide further information.

Sincerely,

Anne Stauffer, Deputy Director – Health and Environment Alliance (HEAL),

On behalf of the EU Healthy Air Coalition (EUHAC) other founding members:

Dr Ole Johan Bakke, President – Standing Committee of European Doctors (CPME)

Dr. Wolfgang Fecke, Executive Director – Association of European Cancer Leagues (ECL)

Susanna Palkonen, Director – European Federation of Allergy and Airways Diseases Patients' Associations (EFA)

Dimitris Kontopidis, Chair – European Lung Foundation (ELF)

Dr. Milka Sokolović, Director General – European Public Health Alliance (EPHA)

Prof. Dr. Barbara Hoffmann MPH, Advocacy Council Chair – European Respiratory Society (ERS)

Xavier Brenez, Chief Executive Officer – Independent Health Insurance Funds (Mutualités Libres)