



REPLIES OF THE EUROPEAN COMMISSION

TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT

Urban pollution in the EU

Cities have cleaner air but are still too noisy

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This document presents the replies of the European Commission to observations of a Special Report of the European Court of Auditors, in line with Article 265 of the [Financial Regulation](#) and to be published together with the Special Report.

I. THE COMMISSION REPLIES IN BRIEF

The Commission welcomes the European Court of Auditors' (ECA) special report on urban pollution. The report provides a good overview of the legal situation as well as actions taken by the Commission and three audited cities (Athens, Barcelona and Kraków) in relation to air and noise pollution. Since its launch, the Commission has consistently seen the audit as an opportunity to further reflect, improve and collaborate in an effective manner with the Member States on urban pollution in general, and on air quality and noise pollution reduction in particular.

Air quality and noise reduction are important goals of the European Union, notably in the context of the implementation of the European Green Deal, in particular the zero pollution ambition for a non-toxic environment and the related Zero Pollution Action Plan. Air pollution and environmental noise significantly impact public health, the environment, and the overall quality of life for citizens. Poor air quality can lead to respiratory and cardiovascular diseases, premature deaths, and reduced life expectancy, while noise pollution can cause stress, sleep disturbances, and cognitive impairment, among other health issues.

The EU recognises the importance of addressing these issues and has implemented various policies and directives to improve air quality and reduce noise pollution. This has become even more important after the adoption of the European Green Deal. However, more efforts by all Member States are needed to reach air quality and noise levels that are safe for humans' health.

As regards the overall conclusion ECA asserts in the report on the actions undertaken by the Commission and the selected member states in the area of air and noise pollution¹, the Commission stresses that the results of its own evaluation of the Ambient Air Quality Directives (AAQD) from 2019 concluded that the legislation is at least partially effective.

The ECA recommends the Commission to assess the feasibility of introducing EU noise-reduction targets and noise limits in the Environmental Noise Directive, and aligning the noise exposure reporting thresholds as closely as possible with those recommended by the World Health Organization. The Commission recognizes the importance of the issue and of the recommendation and accepts it fully. The recommendation is in line with the conclusions of the report on the implementation of the Environmental Noise Directive published in 2023, noting in particular that the Commission will assess possible improvements to the Directive, including noise reductions targets at EU level (as underlined in the zero pollution action plan).

¹ See paragraph 91 of the special report.

II. COMMISSION REPLIES TO MAIN OBSERVATIONS OF THE ECA

1. EU air quality standards in the cities²

The Commission underlines that the audit focuses on three case cities, and wishes to highlight that air quality standards are being met in many other EU cities.

As regards recent achievements in the field of air pollution, the Commission recalls that it proposed, on 26 October 2022, to revise the EU rules on ambient air – the Ambient Air Quality Directives. On 14 October 2024, the co-legislators adopted the revised Directive. The Directive includes a 2050 zero pollution objective as a binding target with a regular review mechanism to ensure a dynamic trajectory towards its achievement. It sets stricter EU air quality standards to be met by 2030, coupled with tighter deadlines for action, enhanced air quality assessment and public information. The Directive includes an access to justice clause, and citizens will also have a right to claim compensation for damage to health due to air pollution.

Furthermore, the Commission is in the process of evaluating the National Emission reduction Commitments (NEC) Directive (which requires Member States to reduce their national emissions of 5 key air pollutants), which will be finalised by the end of 2025. As indicated in the Commission's report to the Council and the European Parliament on the implementation status of the NEC Directive in 2024³, the overall compliance with the Directive's emission reduction commitments is relatively good for all pollutants except ammonia. In view of the more stringent reduction commitments for 2030 onwards, all pollutants for which the Directive sets emission reduction commitments require continued attention.

When it comes to noise, the Commission continues to work on actions identified in its Report on the Implementation of the Environmental Noise Directive (COM(2023) 139 final), including supporting Member States in their implementation and mainstreaming efforts, and accelerating compliance. In that regard, the Commission organised, in February 2024, a Webinar on Low Noise Road Surfaces, and in June 2024, a TAIEX-EIR multi-country Flagship workshop on noise: progress towards meeting Member States' noise limit values and EU reduction targets. In October 2024, the Commission launched six new infringement cases for non-reporting of strategic noise maps.

Concerning ECA's observation⁴ on the shortcomings of the Commission's enforcement of the AAQD and the END Directives in the three cities selected, the Commission notes that the data that is presented in the special report shows some improvements in the selected cities.

2. Addressing air and noise pollution in cities

The Commission stresses that there are important challenges cities have to tackle in order to address the negative consequences of transport on health and environment, as indicated in its European Green Deal, the Sustainable and Smart Mobility Strategy, the Fit for 55 package, the Zero Pollution Action Plan, and Europe's Beating Cancer Plan.

² See paragraphs 22 to 35 of the special report.

³ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52024DC0348&qid=1722500216804>

⁴ See paragraphs 56 to 63 of the special report.

Nearly all of the EU urban population is exposed to concentrations of fine particulate matter (PM2.5) above the latest guidelines of the World Health Organization (WHO), and all Member States report exceeding levels of ozone and nitrogen dioxide. When it comes to air pollution, road transport is the main source of nitrogen oxides (NOx), responsible for 48.6% of emissions in 2022, and accounting for about 29.3% of PM2.5 and PM10 emissions. Moreover, 70% of the EU urban population is exposed to unhealthy levels of road traffic noise during daytime. In its Sustainable and Smart Mobility Strategy, the Commission announced the revision of the legislative framework on roadworthiness to ensure lifetime compliance of vehicles with emission and safety standards. Besides air pollution also measures addressing noise pollution could be considered.

In its Urban Mobility Framework, the EU put forward more decisive action on urban mobility to shift from the current approach based on traffic flows to an approach based on moving people and goods more sustainably. Those actions include:

- Encouraging active mobility modes, such as walking and cycling, as they significantly reduce urban air and noise pollution. The 2021 Urban Mobility Framework places public transport firmly as the backbone of sustainable urban mobility, together with active modes and shared mobility services. Active mobility will be further supported with the implementation of the 2024 EU Declaration on Cycling,
- Recognising the use of low-emission zones (LEZ) as effective tool to address local air quality problems, by reducing the access of more polluting vehicles to sensitive urban areas.

Furthermore, the revised TEN-T Regulation now legally requires the largest 431 cities (EU urban nodes) to adopt a Sustainable Urban Mobility Plan (SUMP) that prioritizes the least polluting transport modes, and to collect and report relevant data on key sustainable urban mobility indicators. In the case of Kraków, the ERDF already co-funded in the 2014-2020 programming period the SUMP of the Kraków Metropolitan Area, which introduced a horizontal “pollution conditionality” for all projects in Kraków. In the 2021-2027 programming period, the partnership agreement with Poland stipulates that SUMPs are a mandatory condition of ERDF support to investments in sustainable urban transport.⁵

The Commission underlines that the overall policy framework in place contributes substantially to the achievement of EU climate and zero pollution objectives. In addition to legislation and policies on air quality, noise and transport (mentioned above), this includes support through the Horizon Europe 100 Climate-neutral and smart cities Mission and urban initiatives of the European Commission such as the Green City Accord. Through the ‘100 Climate-neutral and smart cities’ Mission, funding has been dedicated to targeted calls for proposals on topics such as promoting public transport, rethinking urban space for climate neutrality, zero-pollution cities, and mobility management plans.

As regards the report’s assertion about the inadequate assessment of the outcome of EU-funded projects aiming to tackle noise and air pollution⁶, the Commission underlines that, from the perspective of the cohesion policy Funds, air pollution is an issue that should be dealt with at the level of metropolitan area. Investments made individually by single municipalities cannot achieve the set targets if they are not seen in the wider context of a metropolitan area. For this reason, several ERDF programmes in 2021-2027 programming period, as for example the new ERDF Pluri-regional programme of Spain, include the functional urban area approach.

⁵ See Box 5 of the special report.

⁶ See paragraphs 88 to 90 of the special report.

With reference to the observation concerning the absence of indicators measuring the projects' contribution to resolving air and noise pollution⁷, the Commission points out that, for 2014-2020 operational programmes financed from ESI Funds, there were no common indicators to measure pollution nor noise reduction. At EU level, tracking of cohesion policy contribution to clean air targets, was possible through a system of markers that quantifies expenditure contributing to clean air objectives by attributing a certain weight to each category of investment (intervention fields). These markers were developed on the model of the EU climate "Rio markers - please see the link [Tracking cohesion policy air quality investments 2014-2020 | Data | European Structural and Investment Funds \(europa.eu\)](#). For 2021-2027 period the issue of lack of indicators was addressed in relation to air pollution and two common indicators were established (result indicator: RCR50 – *Population benefiting from measures for air quality* and output indicator: RCO39 – *area covered by systems for monitoring air pollution installed*) based on Commission SWD(2021) 198 final⁸.

III. COMMISSION REPLIES TO THE RECOMMENDATIONS OF THE ECA

Recommendation 1: Prioritising actions against noise pollution

The Commission should assess the feasibility of:

- (a) introducing EU noise-reduction targets and noise limits in the Environmental Noise Directive;**
- (b) aligning the noise exposure reporting thresholds as closely as possible with those recommended by the World Health Organization.**

Target implementation date: 2029

The Commission accepts recommendations 1(a) and 1(b).

The Commission recognises the importance and agrees to prioritise actions against noise pollution by assessing the feasibility of introducing EU noise-reduction targets and noise limits in the Environmental Noise Directive, and aligning the reporting thresholds as closely as possible with the standards recommended by the World Health Organization. It also agrees with the recommended target implementation date.

⁷ See paragraph 101 of the special report.

⁸ COMMISSION STAFF WORKING DOCUMENT Performance, monitoring and evaluation of the European Regional Development Fund, the Cohesion Fund and the Just Transition Fund in 2021-2027.