

**Convention on Long-Range Transboundary Air Pollution**  
**60th session of the Working Group on Strategies and Review**  
**Agenda item 3: Progress in the implementation of the 2022-2023 workplan**  
**Comments by the EU and its Member States on the Cost of inaction report**

17 March 2022

The EU and its Member States would like to thank the Task Force on Integrated Assessment Modelling for the revised report on cost of inaction. We are pleased to see that most of the comments we submitted on the report have been integrated in the new version.

We submit the following general and minor editorial comments on the new draft report:

- We reiterate the request to clearly list the five report questions together with their short answers in the executive summary and/or the closing remarks, for clear communication.
- The usefulness of the report is reduced by the lack of comparability between presented data; however, we understand that this is for lack of time and resources to provide gap filling and agree to keep the current summary of mixed/diverse data (e.g section V).
- In paragraph 4: The sentence “In the Eastern part of the ECE region in particular, there insignificant potential for reducing monetary damage” should probably be corrected to “..., there is significant potential...”
- In paragraph 17, the sentence “Then, depending the type of results presented, one of the two spatial value transfer methods is chosen” should read “Then, depending on ...”
- The text gives the percentage of morbidity costs in overall health costs. We suggest that the valuation approach to mortality, either by VSL, or by VOLY, should be clarified, in paragraphs 25, 29, and 32.
- Paragraph 31: Current figure 3: the top bar in the graph is missing the label “2020”
- Box 2: should contain accurate information from the CE Delft 2020 publication (see its page 6):
  - o “432 large European cities in 30 countries” instead of “432 large Western European cities”;
  - o the authors should verify whether the indication of €2015 price base for the values calculated (e.g. “166 billion in 2018”) is correct
  - o “3.9% of the cities’ income“ instead of “-9% of the cities’ income“.

- The reason why some countries or results were chosen to be included in the report (whether it is a representative case, how other countries should use the information) is still not explained in the report (e.g. paragraphs 33 and 34); a short footnote to the cases in question would be helpful.
- Paragraph 50: this assumedly refers to the old National Emissions Ceiling Directive as the new National Emission reduction Commitments Directive only entered into force on 31 December 2016; the reference should be corrected.
- Paragraph 54: the language needs to be corrected as the EU Clean Air Outlook information quoted is not about total damage from premature mortality but the number of premature deaths due to PM exposure. Similarly it should be clarified that the ozone-related damage reduction refers to premature deaths.
- Paragraph 59: second sentence should not only refer to “reduced negative effects of air pollution on crop yields”. According to Annex to CAO2 report, page 163, Table 5.29 data on costs refers to “Benefits from reduced damage to materials, crops, forests and natural ecosystems...”The reference to 20-30 billion annual health benefits is only the outcome from one of the scenarios examined in the Clean Air Outlook report; it would be more balanced to quote the entire range for 2030 (8-43 billion EUR). Similarly, the quoted numbers for reduced non-health damage only cover the high-estimate scenario. The paragraph should be rephrased as followed:
  - o 59. Recent analysis in the second Clean Air Outlook shows that, within the European Union-27, implementation of measures in accordance with NAPCPs ~~could would~~ result in additional health benefits of about ~~€208 billion–€3043 billion~~ annually in 2030 (see figure 17 below, left-hand panel). Additionally, European Union countries ~~could would~~ gain about ~~€400305 million–€900 million~~ annually from reduced negative effects of air pollution on materials, crop yields, forests and natural ecosystems in 2050 relative to the baseline (see figure 17, right-hand panel, NAPCP). These are benefits achieved without excessive costs. If all technically feasible measures were to be applied irrespective of costs (MTFR scenario), annual health benefits ~~could would~~ reach ~~€153–€205 billion~~ in 2050, accompanied by ~~€2.2–€5 billion~~ in non-health benefits.
- Paragraph 59, Page 24, Figure 15 - right: values in billions of year 2015 euros for non-health data (MTFR data for the years 2030 and 2050) does not correspond to the information in paragraph 59 and the reference source; values for MTFR scenario require correction (see page 44, Table 3.19 Amann et al. 2020).

- Paragraph 62: please redraft the last sentence which seems to be misleading "... potential emission reductions... were estimated at 75% lower...". It is not a 75% *lower* emission reduction that is described but a potential emission reduction of 75% below baseline.
- Paragraph 65: The report should clarify whether crop productivity improvements evaluated in the report come only from reduced ozone, or also from climate policy impacts.
- Paragraph 68 uses the word "welfare benefits". Does this imply something different than the "health & environment benefits" discussed in other paragraphs? If not, we suggest that the same terms should be used, or that a clear explanation of "welfare benefits" should be given.
- In paragraph 77: please replace "... with more assessments ..." by more clear language e.g. "... to provide/produce more assessments ..."
- The main conclusions and messages about the cost of inaction being higher than the cost of measures should be highlighted in section IX, to ease communication to policy makers.
- The numbering of Figures and Tables needs to be corrected throughout the text.

We reserve the right to submit further comments.

---