Brief report from
EWGEA XVIII Annual meeting (virtual)
28-30 September 2020

XVIII Annual meeting of
EUROSAI Working Group on Environmental Auditing
(virtual)

Air quality and urban traffic – problems and possible solutions in auditing tasks
Preface:

Ladies and Gentlemen,

Dear Members,

It is an honour and great pleasure to welcome you at the 18th annual meeting of the EUROSAI Working Group on Environmental Auditing. Thank you for your presence today. Let me also welcome our guests from the European Commission, European Environmental Agency, representatives of the National Fund for Environmental Protection and Water Management, the Ministry of Climate, and the Polish Smog Alert.

Today’s event is special, for at least two reasons.

Firstly, it is the first annual meeting organised by the Supreme Audit Office of Poland as the Chair of the Group, after we took it over from our Estonian friends – let me express here my gratitude to the Estonian SAI for their great work. We are enthusiastic about new tasks related to the Group Strategy for the years 2020-2024, and we will continue with the best practices of our cooperation to date. But we also want to introduce new elements – to meet current challenges. At this point let me say that NIK has already had the honour to chair the EUROSAI Working Group on Environmental Auditing, so this is not a novelty to us. And exactly 20 years ago – in October 2000 – the first annual meeting of the Group was held right here in Warsaw. I am pleased to see that the idea of cooperation and sharing experience on environmental audits is still alive, and that new goals are set and achieved. And it is so because of our joint efforts and involvement in the Group’s activities!

The other thing that is special about today’s meeting is the pandemics, in which we are living now, and which has an impact on our works. The spring session of the Group was held online, and today we are having an online annual meeting for the
first time. I believe that most of us would prefer to meet in person, to see our colleagues and to talk to them. Still, we have to take necessary safety measures, and adjust our expectations to the reality. So we should focus on the opportunities that modern technologies give, and try to make this on-line meeting as effective as possible. At the same time, I hope that this is a temporary situation, and that in the future we will again enjoy in-person meetings, face-to-face conversations and direct work.

The main topic of this meeting is *Air quality and urban traffic – problems and possible solutions in auditing tasks*. The threat of living in the air polluted with dust has a huge impact on the health of millions of Europeans. I am looking forward to presentations and discussions on this topic. We will hear contributions of representatives of the European Commission, European Environmental Agency, and Polish authorities. The voice of the civil society is also of great importance, so I am glad that the Polish Smog Alert joined us today, too. In the next days we will discuss the results of audits on air quality, conducted by Members of our Group – both SAIs that participated in the *International air quality audit*, completed two years ago, and those who conducted their own national audits. I am looking forward to discussions on the results of our work, and to confronting SAIs’ work with the measures taken by authorities in different states.

On Wednesday there is a meeting of the Group’s newly appointed Steering Committee. I wish all its Members a lot of enthusiasm and energy for future works.

We have three interesting and busy days ahead of us. Thank you once again for your participation and valuable input. I wish you a fruitful meeting and a lot of opportunities to share and broaden knowledge on what can be done to reduce pollution in the air around us.

Stay in good health!

Marian Banaś
Chair of EUROSAI WGEA
President of the Supreme Audit Office of Poland (NIK)
Part one: Air pollution from a non-audit perspective

Mr Francois Wakenhut, European Commission Environment DG

EU Clean Air Policy

In his speech Mr Wakenhut presented the EU framework of policies related to clean air, including setting objectives for good air quality (Ambient Air Quality (AAQ) Directives) and reducing emissions. He mentioned some examples of measures to combat air pollution specific for particular sectors: transport, power and heat industry and agriculture. He also discussed fitness check of AAQ Directives that resulted in four main conclusions connected with: monitoring network, EU air quality standards, reliable and comparable information and clear requirement to take remedial action. Finally, Mr Wakenhut mentioned the Commission's plans for further action to improve air quality, such as: zero pollution action plan for air, water and soil in 2021; proposal of strengthening provisions on monitoring, modelling and air quality plans; revision of air quality standards to align them with the WHO recommendations.

Mr Martin Adams, European Environment Agency

Europe’s air quality – an updated overview

At the beginning of the presentation Mr Martin Adams recalled the role of the EEA, pointing out that it is an institution responsible for analysing, assessing and disseminating information, becoming an interface between science and policy.
He pointed out that air pollution causes premature deaths across Europe differently in particular countries – and that this disproportion is particularly visible in the western and eastern part of the European continent (the average being higher in Eastern Europe). Moreover, Mr Adams discussed detailed data on the exceedances of the standards relating to PM$_{10}$, P$_{2.5}$ and NO$_2$. Finally, he pointed out that the current policies contribute to the improvement of air quality, however air pollution still remains cause of 400 000 premature deaths annually in Europe, and also harms vegetation and existing ecosystems.

Ms Marta Babicz

National Fund for Environmental Protection and Water Management

Programmes and projects contributing to clean air in Poland

In her presentation Ms Babicz focused on the activities of the institution she represents relating to improve air quality in Poland. The Fund, having 30 years of experience in financing environmental & energy projects, focuses, among others, on the project called Green Investment Plan (grants and loans with the total budget of EUR 1,77 bn) covering the following areas: Clean Heat, Common Energy, Water for Poland, Eco-Transport and Innovative Energy. Clean Air Programme, dedicated to natural persons owning or co-owning single-family buildings, offers grants up to PLN 37 000 plus loans covering up to 100% of the investment cost. 56 000 residential buildings have been modernised to date, however the total budget of this programme amounts to EUR 441,8 mln.
Ms Grażyna Sztandera, Ministry of Climate

*Actions to accelerate the process of air quality improvement in Poland*

Ms Grażyna Sztandera discussed the main factors influencing air pollution in Poland as well as the national and European legislation in force in this regard. Ms Sztandera also mentioned strategic documents constituting the basis for the analysis of anti-smog policies e.g. the National Air Protection Programme of 9 September 2015 or National Programme for Reducing Air Pollution, adopted by Resolution No. 34 of the Council of Ministers on 27 April 2019. Besides Ms Sztandera explained the role of the regional governments and the anti-smog resolutions adopted by these authorities.

Among the most important actions aimed at reducing emissions in the municipal and residential sector, Ms Sztandera listed the following: replacement of low-efficient, high-carbon boilers with low-emission coal, oil and gas boilers; electrical heating; using various emission-free heat sources, e.g.: heat pumps or solar panels. In the next part of her speech, Mrs. Sztandera mentioned the Clean Air Programme along with legislative measures taken to increase its effectiveness and various ways of financing remedial measures to improve air quality.
Ms Anna Dworakowska, representing the Polish NGO dealing with activities to improve air quality in various forms, presented her assessment of the Clean Air Programme – a comprehensive state program implemented in Poland for several years to replace old poisonous heat sources in households with new and modern ones. Ms Dworakowska drew attention to the shortcomings of the current Programme, mentioning, among others: not sufficient involvement of municipalities; lack of financing for multifamily buildings and also lack of a separate programme for the lowest income groups of citizens. Finally Ms Dworakowska stressed the still poor level of knowledge on the subject among potential beneficiaries pointing to the results of surveys: 58% of the beneficiaries does not plan heat source replacement; only 13% know by which date they have to replace their boilers and 80% know nothing or little about the Clean Air Programme.
Part two: Main factors influencing air pollution – SAIs experience

Transport

Ms Xhuljeta Celaj & Mr Aulent Guri, SAI Albania

Colleagues from the Albanian SAI presented the results of the audit devoted to the air quality, performed in their country. They underlined the fact that in Albania the average number of deaths caused by air pollution per 100,000 inhabitants remains higher than in other European countries. The scope of the audit referred to three main questions: if the policies and legislation adopted for resolving air quality problems have been effective, if the policies on air quality have been efficient and what is known about their costs and benefits; and whether the level of air quality have been monitored, inspected and reported effectively. The main conclusions of the audit were: the process of air quality monitoring carried out in Albania is not efficient, the money spent in course of this process is used mainly for salaries / allowances for employees involved in the monitoring, while there are no funds for the calibration of the monitoring station laboratories. Besides, poor budget planning causes separation between the objective of air quality monitoring and the money spent on it. SAI of Albania also expressed recommendations directed to the state institutions responsible for air quality in Albania – to take appropriate steps to improve the situation in line with the audit findings.

Ms Cecilia Kellberg, SAI Sweden

The representative of the Swedish SAI described the results of the audit which was aimed to answer the two main questions: have the policy instruments contributed to achieving Sweden’s objective of reducing greenhouse gas emissions in the transport sector at a reasonable socio-economic cost and contributed to stable long-term conditions. Policy measures covered by the audit included were i. a. green car rebate and motor vehicle tax exemption for green cars. Ms Kellberg also presented the main conclusions of the audit which were, among others: insufficient impact assessments
(including e.g. no plan for follow-up and evaluation), relatively high level of socio-economic costs of the policy instruments and lack of long-term and predictable conditions for the purchase of new cars and car ownership.

**Industry**

**Ms Hala Abo-Kalla, SAI Israel**

The representative of SAI Israel informed the participants of the meeting on the efficiency and effectiveness of the measures taken by Israeli authorities to improve air quality, following the audit performed several years before. Ms Abo-Kalla described, among others, actions taken by the authorities aimed to encourage the reduction of SO\textsubscript{x}, NO\textsubscript{x}, PM\textsubscript{2.5} emissions, to introduce national plans to reduce and prevent pollution, to increase data collection frequency, measurement and enforcement in accordance with the *Polluter Pays Principle*, to reduce the use of coal, to promote the use of natural gas and also to replace polluting fossil fuels with renewable energy.

**Ms Marina Blazeska, SAI North Macedonia**

Ms Blazeska presented conclusions of the follow-up audit of air quality in North Macedonia which was aimed to assess if recommendations based on the previous audit, conducted in 2017, have been implemented by the state authorities. According to the presented data, improvement of air quality still requires some actions to be taken. The representative of the North Macedonia SAI mentioned, among others, unsatisfactory progress in strengthening administrative and technical capacity at central and especially local level, low level of inspection controls mandated by the Law on Ambient Air Quality, lack of plans to improve air quality in many municipalities where levels of polluting substances exceed the limits, and no monitoring system to measure the implementation on central and local level.
Low emission

Mr Vladimir Matus, SAI Slovakia

The representative of the Slovak SAI discussed the results of air quality audit, which was carried out in 2017. The decreasing trend in emission of main pollutants is already visible in Slovakia, however Mr Matus pointed some issues requiring improvement: lack of state Comprehensive Air Quality Strategy, insufficient number of stations within monitoring network and lack of binding indicators to measure the effectiveness and efficiency in air quality improvement. Problems of worsening ambient air quality, especially in winter seasons are still observed in several locations. Mr Matus also shared some good practices resulting in decreased emissions caused by public transport in cities.

Ms Katya Nedialkova, SAI Bulgaria

In her presentation Ms Katya Niedialkova showed the impact of the 2017 air pollution audit on the current state of air quality in Bulgaria. In major cities PM pollution continues to be the main air quality related issue, and the percentage of population living in PM polluted areas is still high. However, for instance percentage of the population living at excessive levels of PM$_{2.5}$ pollution amounted to 56% in 2018 – which is a reduction by 7% compared to 2017 in living areas where the measurement is performed. Ms Niedialkova also pointed some improvements introduced as the result of the previous audit, including among others: creation of the system dedicated to inform the population about air quality in real time and increased activity of non-governmental organisations to combat air pollution in the capital of Bulgaria.
European perspective

Mr Colm Friel, European Court of Auditors

Air pollution: Our health still insufficiently protected

Mr Colm Friel presented results of the audit on air pollution carried out by the ECA in 2018. He pointed out that generally the audit findings are positive, which means steady improvement for some pollutants, however there are also still some weaknesses in the system, e.g.: the Ambient Air Quality Directive includes insufficient standards and monitoring rules, Member States often target compliance instead of effectiveness, EU policies (for diesel or biomass) and funding are not always consistent with clean air. Mr Friel also explained what recommendations have been prepared by the ECA after the audit including, among others: more effective actions of the EC regarding the implementation of the Directive, propose to tighten air quality standards and planning procedures required by the Directive, aligning other EU policies and funding with air quality objectives. Mr Friel also mentioned that most recommendations have been accepted by the Commission, which systematically takes follow-up actions.

Main factors influencing air pollution – SAIs experience (continuation)

Ms Kristyna Liskova & Mr Benjamin Groll, SAI Czech Republic

Support of the air quality improvement in The Czech Republic

Our Colleagues from Czech SAI presented results of the audit related to air quality improvement, which aimed at: assessment of funds dedicated to combating air pollution, functioning of the Operational Programme Environment and the way the funds are spent. Households, energy and heat generation sector and transport constitute the main factors of air pollution. As a consequence, 250 million EUR from the EU funds have been dedicated to replace outdated boilers. Besides, it was mentioned during the presentation that 51% of sulphur dioxide emission is caused by
the energy and heat generation system, whereas the transport sector is responsible for 32% of nitrogen emissions. In conclusion: air quality still requires improvement, however some positive changes are expected after the ban of obsolete boilers, to be introduced in 2022.

Ms Teresa Estrela, SAI Portugal

Air quality in Portugal

The presentation prepared by Ms Teresa Estrela focused on findings of the audit on air pollution covering the years 2010-2018. One of the objectives of the audit was to assess if sufficient measures have been taken to maintain air pollutant levels below the established limits. Audit findings showed that, event though Portugal has policy related to air quality in force, its regulations are not sufficient, for instance the measures, defined in the strategy paper are not sufficiently implemented and monitored, and there is no cost-benefit analysis present. The audit showed, among others, that air quality has been progressively improving but the measures taken are not entirely effective, and health effects of air pollution have not been monitored in a proper way.

Mr Jerome Perdreau, SAI France

Air quality policies in France

Mr Jerome Perdreau from the French SAI, discussed findings of the audit related to air quality. According to the presentation: the transport sector requires low emission zones implementation to be accelerated and subsidies to be more efficiently utilised for converting vehicles to clean energy engines. Regarding industry, some sources of air pollutants are insufficiently regulated and a better cooperation between health care services and epidemiologic services is demanded. As for the residential sector, auditors pointed out that subsidies used to replace old heating units are helpful but not sufficient. Moreover, combating air pollution in agriculture also requires measures
to be taken, for instance implementation of a permanent monitoring of pesticides in the air.

Part three: Current and planned activities of EWGEA members

Ms Vivi Niemenmaa, INTOSAI WGEA Secretariat

Current activities

Ms Vivi Niemenmaa familiarized participants of the meeting with the INTOSAI WGEA organization, including its six regional working groups. Besides, she focused on the Work Plan 2020-2022 of INTOSAI WGEA, explaining the seven Thematic Work Packages. Ms Niemenmaa also informed about the Group’s upcoming Assembly Meeting on 19-21 January 2021, which will be dedicated to circular economy.

Ms Marta Pankowska, SAI Poland

Cooperative audit on plastic waste

Mr Marta Pankowska, representing the Regional Branch of NIK in Kraków provided information related to the on-going cooperative audit on plastic waste. The audit is aimed to present the state of the national plastic waste management systems in light of the upcoming era of limiting the plastic consumption. The project associates 12 SAIs and is headed by NIK. In line with the presented action plan, the joint report based on national audit findings will be published in the 3rd quarter of 2021.

Ms Katy Losse, SAI UK

Key risks and SAI unique selling points for environmental audit

Ms Katy Losse from SAI UK presented participants of the meeting with the initial assumptions of a brand new project. The basic concept of this initiative is to develop a paper on how SAIs might use an analysis of their unique role and the key risks for
governments’ approach to climate and environment, to help guide and target environmental audits. More details on the project will be provided to EWGEA members in the nearest future.

Mr Andreas Bolkart, European Court of Auditors

Preparing for future risks and climate crisis:

Time for audit to take a long-term view?

Mr Andreas Bolkart, representing the ECA, presented a new EUROSAI Project Group to work on sustainability in long-term policy planning and public finances focused on climate change, as one of the biggest risks. The objectives for this project are: methodological development among EUROSAI members related to future thinking and foresight; auditing future risks, such as climate crisis; climate mainstreaming in spending, climate proofing and tracking methods: assessment of whether spending contributes to achieving climate objectives and whether reporting on climate action is reliable; facilitating sharing of audit approaches and experiences on the above mentioned topics providing a platform for comparable/similar audit(s) on the topic and conducting the compilation of lessons learned. In line with the presented action plan, the activities of the group are planned as follows: November 2020-February 2021 would be devoted to the collection of SAI experiences, literature review, stakeholder input, development of methodology; 2021 – possible comparable/similar audit(s); June 2021 – status update to the XI EUROSAI Congress, including report on the methodologies; spring 2022 – collection of experiences and finally in September 2022 – compilation of lessons learned in the form of a compendium.
Part four: Summary

The annual meeting of EWGEA in 2020 was devoted to the issue of air pollution. It is still one of the main sources of health and even life threat to many inhabitants of the European continent. The danger related to the presence of hazardous substances in the air around us is present both in large metropolises and smaller towns. Pollution is mainly caused by industry, transport, low emissions and agriculture.

The annual meeting was divided into three parts. At the beginning of the first one, participants had the opportunity to get to listen to representatives of European institutions including the EU and EEA, and ask questions. Next speakers were employees of Polish institutions responsible for the preparation of policies concerning protection of air quality (Ministry of Climate) and financing of specific projects resulting from these policies (Polish National Fund for Environmental Protection and Water Management). A representative of the Polish NGO discussed the effectiveness of state authorities' activities, too. During the session on the second day, the participants' attention was focused on the results of national audits in the field of air protection. All speakers – representatives of the SAIs participating in EWGEA's work – discussed their experiences resulting from the tasks carried out several years ago or quite recently. In the end, on the third day of the meeting, the audience had the opportunity to learn about current events, i.e. the activities of the WGEA at the INTOSAI forum and the ongoing cooperative audit under the EWGEA umbrella. In addition, it was also possible to look at the future – two projects related to environmental issues, which are planned to be implemented in the coming years with the participation of EWGEA members, were presented.

Due to the pandemic situation, the meeting was held on-line. Despite the problems resulting from this state of affairs, in particular the limitation of free discussion and interpersonal contacts, it was possible, thanks to the involvement of all speakers and participants, to create an interesting event that may inspire various activities in the future.