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**ÉCLAIRE**

**Effects of Climate Change on Air Pollution Impacts and  
Response Strategies for European Ecosystems**

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**D18.3 Elaboration of the Modelling Approach for Benefits  
Analysis, Including Illustrative Examples**

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## 1. Executive Summary

The effects for assessment of this work package are to assess the economic value of impacts of atmospheric nitrogen and ozone on:

1. Terrestrial biodiversity
2. Crop production
3. Forest production
4. Carbon sequestration

These effects were selected as being particularly relevant to the pollutants of interest to ECLAIRE, and had the potential for quantification drawing on the outputs of other components of the study. It is noted that the methods and outputs of the analysis need to be in a form that can be integrated with cost-benefit analysis of European air quality policies.

This deliverable provides estimates of damage to biodiversity from deposition of nitrogen, in particular. Three methods for quantification of this important endpoint are considered, each adopting a different perspective:

- Public 'willingness to pay' for protection of biodiversity
- The costs of repairing damage
- Inferred preference for environmental protection drawing on the implications of the Habitats and Birds Directives.

It also provides estimates of damage to agricultural crop production through exposure to ozone. The valuation methods for forestry production and carbon sequestration are also reported.

Analysis has focused on scenarios used in the appraisal of the Clean Air Policy Package presented by the European Commission in December 2013. Special attention is paid to the Current Legislation (CLE) and Maximum Technically Feasible Reduction (MTFR) scenarios. The final analysis will be made using the ECLAIRE scenarios.

There is order of magnitude consistency in the results for biodiversity change generated by the three options identified above, with benefits of more advanced pollution controls in the range €800 million to €10 billion annually, though they imply that the benefits of protecting biodiversity are small compared to the benefits to health. For crops, benefits in the order of €2 billion annually will add to this total.

Consideration needs now to be given to how these results may be refined and then how they may be used to influence policy. Whilst health benefits will continue to dominate the analysis, the requirements of existing EU legislation on ecosystem protection are clear, and to achieve these requirements there will need to be further and substantial reductions in emissions.

## 2. Objectives:

Demonstration of approaches for assessment of change in the value of ecosystem services across policy relevant scenarios at the EU level.

### 3. Activities:

At a workshop held at RIVM in December 2013 it was decided that the key effects for quantification and valuation in work package 18 of the ECLAIRE Project related to impacts on biodiversity. Further effects on greenhouse gas balance, and impacts on forestry and agriculture are also being quantified under this work package, though these are conceptually far simpler to deal with as associated impacts can either be valued through existing markets (for agriculture and forestry) or using established costs per unit emission (for greenhouse gases).

It was accepted at the workshop that valuation of biodiversity is not straightforward, and that there is only a limited amount of information available that is relevant. For this reason it was decided to consider three alternative methods:

1. Application of available estimates of stated public willingness to pay (WTP) for protection of biodiversity. This approach has been applied at a full European scale. In areas where better data are available an approach that provides more explicit linkage of willingness to pay values to changes in species richness is also considered. Consideration is also given here to different factors that need to be taken into account to differentiate WTP across the EU, when relevant.
2. Adoption of repair costs as a proxy for WTP for protection of biodiversity
3. Assessment of inferred (revealed) preference with respect to emissions of air pollutants of policy makers when adopting environmental protection legislation (regulatory revealed preference). Given the extensive exceedance of the critical load for eutrophication and the requirements of the Habitats and Birds Directives, this implies a valuation at least equivalent to the costs of the MTR (Maximum Technically Feasible Reduction) scenario.

Of the three methods the first is conceptually most robust. However, being based on a limited data set the other studies are considered useful for cross-checking.

Analysis is also provided for the quantification of damage from ozone effects on agricultural crops. Further information is provided relevant to valuation of ozone damage to forest, and effects of nitrogen and ozone on carbon sequestration.

Analysis is undertaken using scenarios considered for the European Commission's Clean Air Policy Package of 2013, considering a shift from the Current Legislation (CLE) scenario to the MTR scenario. As noted elsewhere, these scenarios are used here purely for the purpose of illustration, to demonstrate the methods developed in the study.

#### 4. Results:

Results for biodiversity effects are summarised in Table (i). For the Willingness to Pay (WTP) approach consideration was given to adjustment of WTP values according to several factors:

- Variation in income
- Variation in environmental concern as reflected by the Eurobarometer survey (Special Eurobarometer 365)
- Government expenditure on environmental protection

The second and third of these options were problematic for various reasons. In part, they were not sufficiently disaggregated to the levels of damage present across the region, nor to the specific issue of air pollution damage to ecosystems. For Eurobarometer the vast majority of people (95%) considered environmental protection to be important to some degree, with the effect that there was very little differentiation across countries (this strength of view is worth noting). With respect to government expenditure there were several problems also, particularly inconsistency between countries with respect to what was and was not included in the totals. Adjustment by income was thus considered to be the best option, though it, too, is not perfect.

**Table (i) Summary of results at EU28 level from the use of different methods for assessing the biodiversity benefit of moving between the CLE and MTFR scenarios in 2025 and 2030. Units €million/year**

<b>2025</b>	<b>CLE</b>	<b>MTFR</b>	<b>Benefit of change</b>
WTP	3,175 - 9,525	2,294 - 6,822	881 - 2,643
WTP with income adjustment	2,678 - 8,034	1,856 - 5,568	822 - 2,466
Repair cost	9,096	6,361	2,735
Regulatory revealed preference	54,754	63,985	9,231
<b>2030</b>	<b>CLE</b>	<b>MTFR</b>	<b>Benefit of change</b>
WTP	3,116 - 9,347	2,211 - 6,633	905 - 2,714
WTP with income adjustment	2,621 - 7,863	1,781 - 5,343	840 - 2,520
Repair cost	8,745	5,999	2,746
Regulatory revealed preference	61,985	72,597	10,612

The results of Table (i) show roughly an order of magnitude variation in the results of the different methods, though there is much more consistency in the WTP and repair cost methods than with the regulatory revealed preference approach. At the European level income adjustment makes little difference to the WTP results, though it is more pronounced at the national level.

The quantified benefits of reducing emissions are noted to be small relative to the effects on health. However, the quantified effects include only one aspect of impact to ecosystems, the valuation of biodiversity. Further analysis presented here indicates that inclusion of impacts to crop production would add a further

€2billion to benefit estimates of moving from current legislation to the MTR scenario.

Consideration needs now to be given to how these results may be used to influence policy. Whilst health benefits will dominate the analysis, the requirements of existing EU legislation are clear, and to achieve these requirements there will need to be further and substantial reductions in emissions.

#### **5. Milestones achieved:**

MS80: First complete set of scenario results.

#### **6. Deviations and reasons:**

The deliverable was submitted later than originally planned, but this has had no effect on other components as the benefits analysis is the final stage of the assessment. The additional time has allowed integration of additional methods and results, providing a better basis for discussion of the integration of ecosystem impacts with the broader benefits assessment of air pollution policies in Europe.

#### **7. Publications:**

None for this report, as it concerns illustrative application of methods.

#### **8. Meetings:**

The development of this report has been informed through a series of meetings, in particular:

- TFIAM (Task Force on Integrated Assessment Modelling)/NEBEI workshop, Zagreb, October 2013
- Workshop at RIVM, Netherlands, December 18 2013
- 4<sup>th</sup> Annual ECLAIRE Congress, Budapest, September 2014.

#### **9. List of Documents/Annexes:**

Elaboration of the Modelling Approach for Benefits Analysis for Biodiversity, Deliverable 18.3 Version 2. Mike Holland (EMRC), Rob Maas (RIVM), Laurence Jones and Gina Mills (CEH).

# **Elaboration of the modelling approach for benefits analysis**

## **ECLAIRE Project, Work package 18**

### **Deliverable 18.3 Version 2**

**Mike Holland (EMRC), Rob Maas (RIVM), Laurence Jones and Gina Mills (CEH)**

**With contributions also from IIASA, Aarhus University, IVL, and Stockholm Environment Institute**

**July 2015**

## Summary

The assessment of the impacts of ozone and nitrogen deposition on ecosystem services needs to account for a diverse range of impacts, from those on food production and carbon sequestration to the appreciation of biodiversity. The effects of ground level ozone on ecosystems are negative: the more ozone that plants are exposed to the worse they grow, the less food is produced, less carbon sequestered and so on. It is, however, noted that a clear relationship between ozone and biodiversity exposure has not been established in ECLAIRE. Nitrogen being an essential nutrient, however, presents a different picture. Some effects are negative, some are positive, at least in the short term. Plants adapted to live with limited nutrient availability will be outcompeted by grasses and other plants with higher nitrogen requirements when there is significant deposition of N from the atmosphere. This will lead to a reduction in biodiversity. On the other hand, forest growth will initially increase when more nitrogen enters the ecosystem, increasing productivity and carbon assimilation. However, as time goes on, forest ecosystems may become nitrogen saturated and not benefit from further deposition. Further to this, the addition of nitrogen may generate nutrient imbalances, for example through acceleration of the cycling of the base cations required to keep up with the growth induced by extra nitrogen, leading eventually to reduced growth and reduced carbon storage.

The nitrogen problem is exacerbated by our ability to quantify one side of the equation, the positive effects in the short term on production, more easily than those on the other side of the equation, the negative effects on biodiversity and on the sustainability of production into the future.

At a workshop held at RIVM in December 2013 it was decided that the key effects for quantification and valuation in work package 18 of the ECLAIRE Project related to impacts on biodiversity.

It was accepted at the workshop that valuation of biodiversity is not straightforward, and that there is only a limited amount of information available that is relevant. For this reason it was decided to consider three alternative methods:

1. Application of available estimates of stated public willingness to pay (WTP) for protection of biodiversity
2. Adoption of repair costs as a proxy for WTP for protection of biodiversity
3. Assessment of inferred (revealed) preference with respect to emissions of air pollutants of policy makers when adopting environmental protection legislation (regulatory revealed preference)

Of the three methods the first is conceptually most robust. However, being based on a limited data set (referenced to a series of key UK studies by Christie et al) the other approaches are considered useful at least for cross-checking.



Analysis is undertaken using scenarios considered for the European Commission's Clean Air Policy Package of 2013, considering a shift from the Current Legislation (CLE) scenario to the Maximum Technically Feasible Reduction (MTFR) scenario. Illustrative results considering effects of both NO<sub>x</sub> and NH<sub>3</sub> for the three methods are as follows:

**Summary of results at EU28 level from the use of different methods for assessing the biodiversity benefit of moving between the CLE and MTFR scenarios in 2025 and 2030. Units €million/year**

<b>2025</b>	<b>CLE</b>	<b>MTFR</b>	<b>Benefit of change</b>
WTP	3,175 – 9,525	2,294 – 6,822	881 – 2,643
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<b>2030</b>	<b>CLE</b>	<b>MTFR</b>	<b>Benefit of change</b>
WTP	3,116 – 9,347	2,211 – 6,633	905 – 2,714
WTP with income adjustment	2,621 – 7,863	1,781 – 5,343	840 – 2,520
Repair cost	8,745	5,999	2,746
Regulatory revealed preference	61,985	72,597	10,612

**Notes:**

- The ranges for WTP and WTP with income adjustment are based on ranges from the Christie et al paper linked to protection of 'non-charismatic' species. Christie includes other ecosystem services that could be added to the estimates shown here. WTP with income adjustment as presented here uses an elasticity of 1.5, though results based on elasticities of 0 and 1 are also presented in the report.
- Results for the regulatory revealed preference method take the change in the cost of pollution abatement as a proxy for the benefits of control, hence the estimate for MTFR is higher than for CLE, unlike the other methods.

The variation in the benefit estimates is around one order of magnitude, when including the regulatory revealed preference approach. The restoration cost approach provides very similar estimates to the upper bound of the WTP range. The inclusion of additional ecosystem services would clearly increase in the WTP estimates.

The table implies that the effect of income adjustment is small. However, this is a function of the baseline value being for the UK which has broadly average income per capita compared to the EU28, hence the adjusted value for the EU28 is little different to the unadjusted. However, results in the main body of this paper show more significant variation between countries. The need to apply income adjustment would be linked to the scope of analysis (e.g. whether conducted for the European Commission or UN/ECE, or for individual countries).

Results imply that the benefits of biodiversity improvement are small relative to those quantified elsewhere for health impacts. However, as noted, there is some bias to underestimation, particularly through the limitation of the ecosystem services included for 'biodiversity'. Also, the true point of comparison is not with other benefits of possible interventions, but with the costs of intervention. These are of course reflected here in the results for the regulatory revealed preference

approach. Whilst the results based on regulatory revealed preference when moving from CLE to MTFR are significantly larger than those from either the stated WTP or repair cost approaches, it is to be remembered that the cost curve is strongly non-linear (see Figure 2 in the main text). For a significant part of the range between CLE and MTFR it is possible that ecosystem benefits could outweigh costs without factoring in health and other issues. This then raises the need to consider the extent to which a strategy based on health protection would differ to one based on ecological protection.

A number of options for refinement of the methods are identified in the text. Some can easily be implemented and will be further explored.

In addition to demonstrating the use of these methods this report also reviews the strengths and weaknesses of each approach. The preferred approach of the three is the use of stated preference WTP. The next phase of the work is thus to investigate how the outputs of the stated preference literature can better be linked to other analysis being performed in ECLAIRE. In this report a simple approach has been taken based on the change in area subject to critical loads exceedance. However, discussions are underway to link to other metrics, including indices of biodiversity. Progress has been made in this direction in work being conducted in the UK.

Analysis is also presented of impacts of ozone exposure on crop production in Europe. This adopts the now-preferred dose-based functions to the extent that they are available (for wheat, potato and tomato). However, it then extends the analysis to all European crop production. Results indicate that moving from current legislation to the MTFR scenario would generate benefits of €2 billion per year. Impacts are dominated by effects on wheat, 30% of the total. Together, wheat, potato and tomato, the three crops for which dose-based functions are available account for 40% of damage.

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## 1 Introduction

### 1.1 ECLAIRE objectives

The ECLAIRE Project (Effects of Climate Change on Air Pollution Impacts and Response Strategies for European Ecosystems), funded by European Commission DG Research under the 7<sup>th</sup> Framework Programme, has the following broad objectives of relevance to the present report:

- To investigate the ways in which climate change alters the threat of air pollution (NO<sub>x</sub>, NH<sub>3</sub> and ozone) on European land ecosystems including soils. This includes the development of response relationships based on field observation, experimental data and modelling.
- To quantify how climate change alters ecosystem vulnerability to tropospheric O<sub>3</sub> and N deposition, including interaction with increased CO<sub>2</sub>. Combined with special topics on interactions with N form (wet/dry, NH<sub>x</sub>/NO<sub>y</sub>), aerosol-exacerbated drought stress and BVOC self-protection of O<sub>3</sub> effects, novel threshold and dose-response approaches will be developed.
- To estimate interactions and feedbacks on plant and soil carbon stocks, greenhouse gas balance and plant species change.
- To apply the new risk assessment chain at the European scale, to assess how projected climate change will alter damage estimates, in part through economic valuation of ecosystem services. Improved integrated assessment modelling will allow cost-benefit analysis to better inform future mitigation and adaptation strategies on air pollution and climate change.

### 1.2 Work Package 18 objectives

Within the Project, Work Package 18 is designed to derive economic impacts and valuation of changes<sup>1</sup> in ecosystem services through the following objectives:

- To link the concept of ecosystem services with existing mapping of European ecosystems and pollutant impacts.
- To characterise the links between pollutant exposure, impact and value to permit quantification of pollutant damage.

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<sup>1</sup> The focus on change is important: the analysis does not seek to ascribe value to the totality of European environmental service, but to the change arising from moving between different policy scenarios.

- To assess change in the value of ecosystem services across different scenarios using a marginal approach to the extent possible.
- To prioritise gaps in the existing knowledge base such that further research can be targeted on the parameters likely to have the greatest economic impact.

A constraint on the analysis is that ECLAIRE does not include original valuation work, but is instead focused on the application of available valuation studies to the ECLAIRE outputs.

The ecosystem services concept has been particularly developed through the TEEB (The Economics of Ecosystems and Biodiversity) Initiative<sup>2</sup>. TEEB highlights that all human societies and communities recognise value in ecosystems, landscapes, species and other aspects of biodiversity, and this alone may be sufficient to ensure conservation and sustainable use. Acknowledging and understanding the nature of 'value' in this sense provides a framework for further analysis where this is required. Demonstrating value in economic terms can assist policy makers and others in reaching decisions that seek to consider the full costs and benefits of an ecosystem rather than just those costs or values that enter the markets in the form of private goods. It is acknowledged that a 'full' accounting of costs and benefits is often not possible beyond the conceptual stage, but, equally, even this provides a higher level of information than has typically been available in the past. A third element of TEEB is the development of mechanisms for factoring these values, quantified or unquantified, into policy through, on the one hand, incentivisation of practices that protect the environment, and on the other hand, penalties for actions that would cause damage.

### 1.3 The objectives of this report

At a workshop of this Work Package held at RIVM in December 2013, it was concluded to adopt a framework for quantification of damage to biodiversity investigating the use of three different approaches. This recognises that no single method is likely to generate perfect results at the present time, but that each may provide some insight.

The first of the three methods is based on available information from stated preference studies regarding the 'willingness to pay' (WTP) for protection of biodiversity. The second is based on use of repair costs, and the third on the inferred costs of environmental policies to the extent that these have not been made explicit, both of these being 'revealed preference' approaches.

It was also decided that the work should give particular attention to the Natura 2000 network. This is established through the Special Protection Areas of the

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<sup>2</sup> <http://www.teebweb.org/>

Birds Directive<sup>3</sup> and the Special Areas of Conservation of the Habitats Directive<sup>4</sup>. These impose a legal responsibility on Member States to:

- “*preserve, maintain or re-establish a sufficient area of habitats for all of the birds [referred to in the Directive]*” [Birds Directive], and
- “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest.*” [Habitats Directive]

The reasons for a particular focus on biodiversity in this report were as follows:

1. Existing assessment of the monetised benefits for European air pollution policies focuses almost exclusively on health impacts (Holland, 2014). Impacts on biodiversity were one of the original concerns that led to the development of integrated European policies on air pollution. Information on the risk to biodiversity from eutrophication indicates that there is still a long way to go before it may be considered that there is a good level of protection from airborne pollutants.
2. Jones et al (2013) demonstrated the potential for quantification at the level of the UK, drawing on research by Christie (2006, 2011). Associated monetary values of effects on biodiversity were a significant part of the total quantified by Jones et al.

An illustrative quantification of impacts to crops and forests is also applied.

The scenarios considered here are not the final ECLAIRE scenarios. Quantification for these will be performed in a further report.

#### 1.4 The rationale for valuation

The objective of economic valuation as applied here is to describe public preference for the efficient allocation of scarce resources (money). Results do not seek to provide insight about the ‘fundamental value of nature’, but instead deal with public perception of how the public would like money to be spent.

Following on from this, some readers may question the very notion that it is appropriate to define monetary values for natural assets. This argument overlooks the fact that decisions on the value of natural assets are taken routinely by policy makers, but those valuations are implicit to the decisions reached. Few would argue against the interests of consistency in policy making being better served by making valuations explicit, as part of the full rationale for any decision.

A particular complication for valuation of impacts to biodiversity is the time dimension. For impacts to health and production from agriculture and forestry this is less important. Some of the impacts are clearly annual (e.g. short term effects of exposure to pollutants on health, or effects on crop production) whilst others can be managed, for example by adjusting harvesting regimes in forests. The longer-term effects on health are quantifiable and limited by life expectancy,

<sup>3</sup> <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:31979L0409>

<sup>4</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>

with effects accruing over a period of perhaps 20 years prior to death (this being the longest lag considered by various health analysts, considered appropriate, for example, where air pollution initiates lung cancer). Effects on ecosystems, in contrast may persist over decades, centuries, or be permanent. This issue is returned to in the discussion.

The terms 'willingness to pay' (WTP) and 'willingness to accept' (WTA) are used at various times in the present report. They are both standard economic concepts: for any economic transaction to take place one party has to be willing to pay an amount that the other will accept for a good. The concept applies not only to material goods. For example, when paying for additional safety equipment in a car, one is not paying for the safety equipment per se, but for the reduction in risk of death or injury that it provides. WTP applies when a risk or impact is reduced, WTA applies when a risk or impact increases.

## 1.5 Accounting Framework for ecosystem services

### 1.5.1 Prioritisation of effects for analysis

In order to understand how complete the assessment of impacts and their economic valuation is, an 'accounting framework' has been generated as part of this work package. The accounting framework shows how impacts, ecosystem services and different types of ecosystem are linked. An overview of linkages is presented in Figure 1. Cells highlighted light blue are those where there is potential linkage to the objectives of ECLAIRE, those highlighted in dark blue have been selected as priorities for the economic assessment (further information on the prioritisation process is provided in other deliverables under this work package). The prioritisation is based on the following criteria:

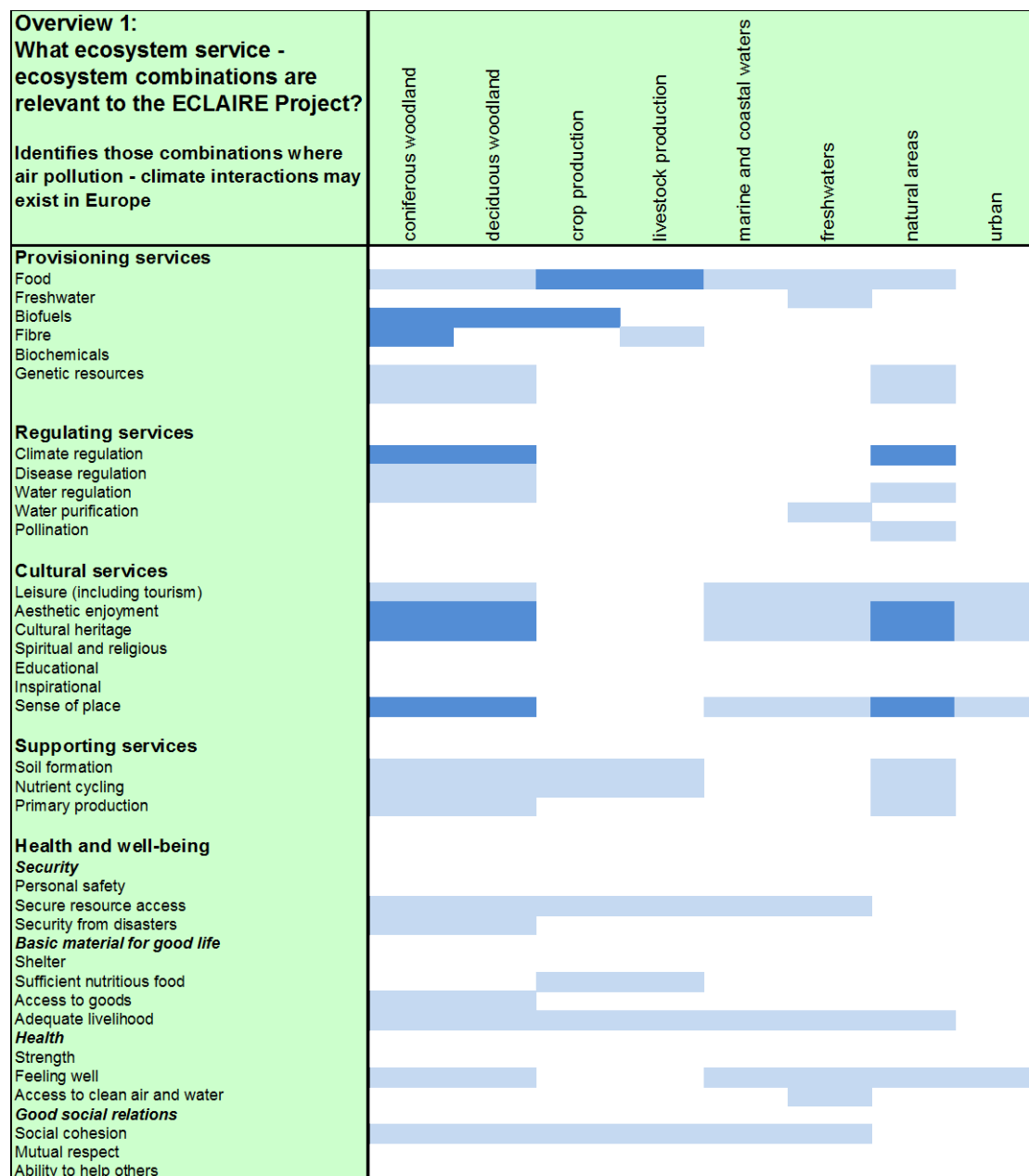
1. Relevance to the objectives of ECLAIRE
2. Relevance to other Work Packages in ECLAIRE
3. Likely availability of data on stock at risk, response and valuation
4. Perceived importance

Figure 1 takes a deliberately broad definition of ecosystem services, including health and well being, as there are issues here that will not be covered elsewhere in existing valuation frameworks for air pollution policy analysis. The listing of ecosystem types (coniferous woodland, deciduous woodland, crop production, livestock production, marine and coastal waters, freshwaters, natural areas and urban) is intended to be aligned with the structure of analysis and the types of effect that may be quantified (or not) through ECLAIRE. The somewhat loose term 'natural areas' is intended to cover grassland, moors, bogs, etc. that are not covered elsewhere.

The prioritisation process clearly needs to take the feasibility of quantification into account. Recent work by Jones et al (2013) provides results across a number of ecosystem services for the UK, reflecting the costs and benefits of declining nitrogen deposition. Two provisioning services were covered (timber and livestock), one regulating service (GHG balance) and two cultural services

(recreational fishing and appreciation of biodiversity). Across these effects there was a mix of losses and gains. Provisioning services were forecast to have experienced a loss against reduced N deposition in the UK in recent years, through reduction of N fertilisation, whilst cultural services benefited. The effect on GHG emissions varied by gas, though dominated by reduced CO<sub>2</sub> sequestration, reflecting reduced N fertilisation. Results are dependent on the precise scenario under investigation, and also assumptions of long term impacts – of particular note is the question of whether in the long-term elevated levels of N deposition are sustainable – a question that is receiving much debate through ECLAIRE.

**Figure 1. Links between ecosystem services and ecosystem types.**





### 1.5.2 Underlying information in the Accounting Framework

Additional information is then provided within the accounting framework to identify the impacts covered under each cell of Figure 1. For example, there are numerous effects of the ECLAIRE pollutants on crop production:

1. Direct effects of N, ozone and CO<sub>2</sub> on crop production, forest growth and carbon sequestration
2. Direct effects of N, ozone and CO<sub>2</sub> on the nutritional value of crops
3. Indirect effects of N, ozone and CO<sub>2</sub> on the performance of insect pests and pathogens [though noting that there has been little research in this area in the last 20 years].
4. Direct injury to leaf crops from exposure to high levels of ozone in sensitive periods

Doubtless other effects can be added to this list. By bringing together this information it is possible to gain perspective on how complete the analysis is, understanding precisely what is included and excluded. This may lead to additional effects being brought into the assessment. Without the framework it would be easy to believe that analysis is far more complete than it really is.

The economic analysis can also be further substantiated with additional contextual information that provides illustration and adds meaning to impact estimates. One important reason for wanting to do this arises from the nature of pan-European analysis. Multiplying a small impact by 530 million people can easily generate a substantial estimate of damage in the order of billions of euro. Contextual information can assist in helping stakeholders reach conclusions as to the likelihood that estimated damage is a reasonable reflection of reality.

Contextual information can take many forms, for example, maps showing the exceedance of critical loads across Europe, photographs of damage to crops, graphs showing response functions, etc. An excellent initiative has been launched by the ICP Vegetation, providing a mobile phone application to photograph and collate ozone damage across Europe<sup>5</sup>.

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<sup>5</sup> <http://icpvegetation.ceh.ac.uk/record/mobile-app-ozone-injury>

## 2 Previous economic analysis of air pollution in Europe

This chapter provides an overview of the most relevant studies for the purpose of this report. For this reason this chapter does not provide detailed discussion of either TEEB (The Economics of Ecosystems and Biodiversity) or of MAES (Mapping and Assessment of Ecosystems and their Services), but notes here their general relevance to the ECLAIRE work<sup>6</sup>.

### 2.1 European cost-benefit analysis (CBA) to support the development of air pollution policies

This section describes the overall framework for CBA in relation to air pollution policy assessment in Europe. It applies equally to work done for the European Commission and the UNECE Convention on Long Range Transboundary Air Pollution.

CBA has been applied to European air pollution policy development since the mid 1990s, during the development of the EU's Acidification Strategy (Holland and Krewitt, 1996). The costs of meeting pre-determined objectives for environmental quality were assessed using the RAINS model (the precursor to GAINS; IIASA, 1996). The monetised benefits analysis at that time focused on quantification of effects on health and building materials of reductions in emissions of SO<sub>2</sub>, NO<sub>x</sub>, NH<sub>3</sub> and VOCs, largely linked to the formation of secondary inorganic aerosols and ozone, drawing on methods developed as part of the EC DG Research ExternE (Externalities of Energy) study. Ecosystem benefits were not described in economic terms, but using physical and chemical parameters (the area of land subject to critical loads exceedance and the accumulated exceedance of critical loads). The demonstration of significant health impacts was a surprise to many of those participating in discussions on the Strategy.

Analysis was subsequently undertaken for the first Gothenburg Protocol to the UN ECE Convention on Long Range Trans-boundary Air Pollution (CLRTAP) (IIASA, 1999a; Holland et al, 1999), the EU's Ozone Directive (AEA Technology, 1998) and the National Emission Ceilings Directive (IIASA, 1999b, AEA Technology, 1999) again using the RAINS model to assess costs and ExternE methods to quantify health benefits. Again, the objectives of the legislation were primarily focused on ecological protection against acidification, eutrophication and ozone. The benefits analysis was extended to include some additional ecological impacts. Effects of ozone on crop damage and forest growth were accepted for inclusion in the final report, but assessment of the benefits of protection for (semi-) natural ecosystems were not. The reasons for rejection were that available estimates from the economics literature either did not link to the metrics used to define ecological improvement, or considered unreasonable scenarios (such as the total elimination of acidifying emissions). The results of the CBA did not play a large role in the decision making process at international

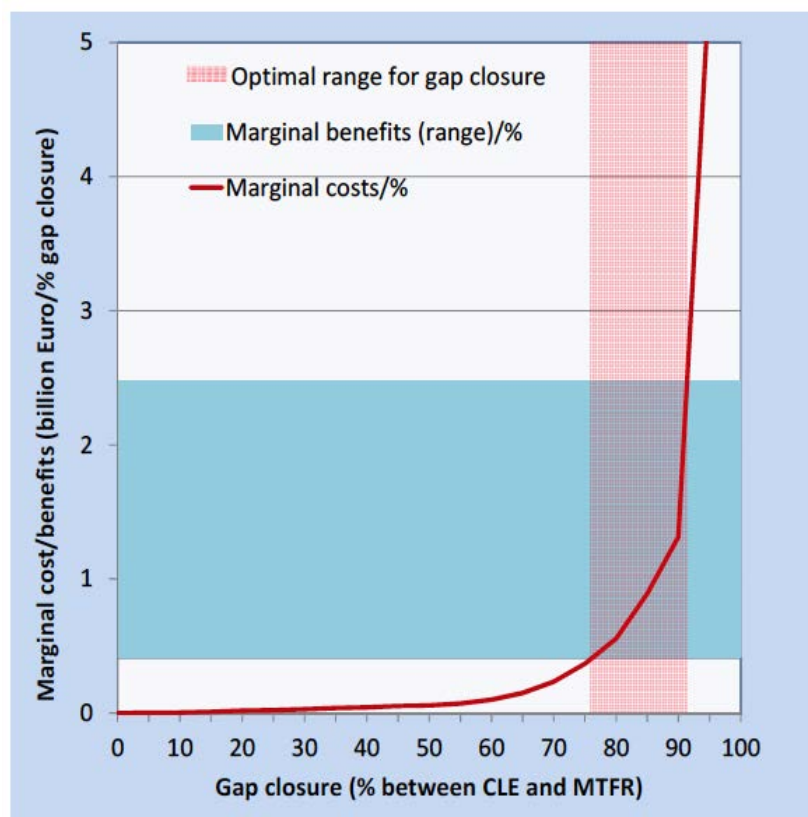
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<sup>6</sup> TEEB: <http://www.teebweb.org/about/>. MAES: <http://biodiversity.europa.eu/maes>.

level, being used mostly to affirm that a cost-benefit assessment had been performed and had generated a positive outcome for the policy proposals under consideration.

Analysis for the EU's Clean Air For Europe (CAFE) Programme in 2005 (AEA Technology, 2005) and for the revision of the Gothenburg Directive in 2011 (Holland et al, 2011) covered a similar range of impacts, mainly health with also some assessment of benefits through reduced ozone exposure of crops and reduced acidification and ozone damage to materials used in buildings and to rubber goods. Benefits to ecosystems were reported in physical/chemical terms. The CBA was again used to affirm that the benefits of the proposed actions would exceed the estimated costs of action.

The most recent air pollution policy analysis at the EU level was undertaken to inform the development of the Clean Air Policy Package, released on 18th December 2013 (IIASA, 2014; Holland, 2014)<sup>7</sup>. The scope of the work was similar to the earlier analysis, again lacking monetization of ecological benefits. A notable difference, however, was that marginal benefits were used to define the ambition level (**Figure 2**).



**Figure 2. Identifying an appropriate ambition level for the EU's Clean Air Policy Package (from IIASA, 2014)**

<sup>7</sup> For full details of the impact assessment of the Clean Air Policy Package see: [http://ec.europa.eu/environment/air/clean\\_air\\_policy.htm](http://ec.europa.eu/environment/air/clean_air_policy.htm)

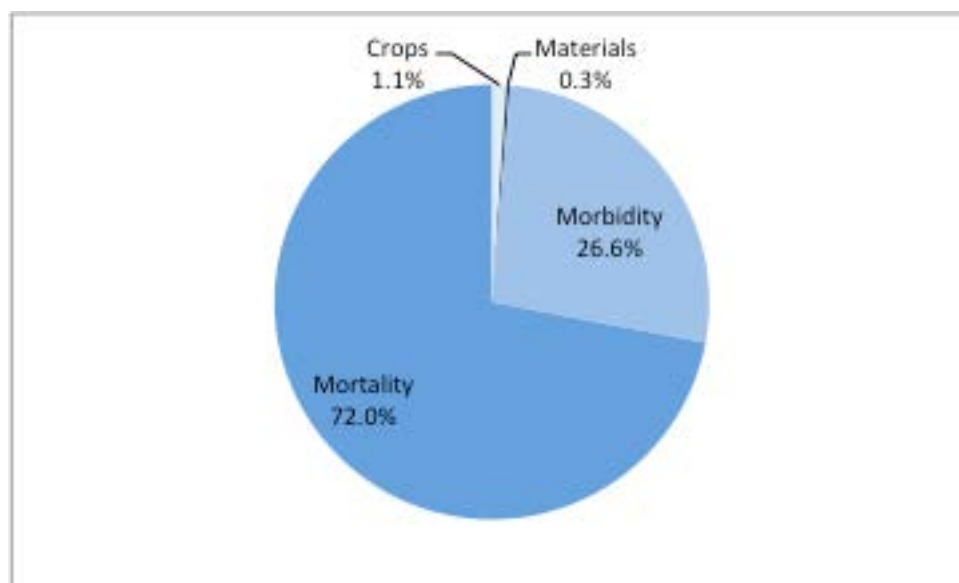
The figure shows on the x-axis the 'gap closure' between the baseline CLE (current legislation) scenario and the upper bound MTFR (maximum technically feasible reduction) scenario. The y-axis shows marginal costs or benefits in €billions per percentage point gap closure. The red line shows marginal costs, which increase as one moves towards the right hand side of the graph as successively more expensive/less cost-effective measures are adopted. The blue band shows the range for mortality benefits linked to a reduction in PM<sub>2.5</sub> exposure, the range corresponding to alternative valuations of the mortality impact. The marginal benefits line is horizontal because the health impact assessment uses a linear response function for mortality with no threshold. Benefits can be maximized by taking the analysis to the point at which marginal costs and benefits are equal, corresponding to a gap closure of between 76% and 91%. The policy objective was defined around the 76% gap closure level.

The approach taken is conservative for several reasons:

- It selects the point at which the lower (rather than the higher) estimate of mortality benefits is equal to the marginal costs.
- It only considers the mortality effects of fine particles, ignoring morbidity effects and all health effects of exposure to ozone
- It completely omits consideration of non-health impacts, including ecosystem benefits
- It takes the estimate of costs as given, without uncertainty.

Despite this in-built conservatism, the Clean Air Policy Package settled on a higher level of ambition in terms of % gap closure to MTFR than previous political discussions, suggesting a far more active role for the benefits analysis than in the earlier work.

Figure 3 shows the relative share of damage to health (as mortality and morbidity), crops and materials in 2030 across the EU from work on the Clean Air Policy Package. The analysis for crops and materials was performed using simplified damage per tonne factors, recognising that it would represent only a small part of the total. Considering ozone alone, it should be noted that crop damage accounts for 13% of total impact.



**Figure 3. Relative share of estimated damage from exposure to fine particles and ozone in the EU28 in 2030 (based on data in Holland, 2014).**

## 2.2 Crop damage assessments at the European scale

A number of crop damage assessments have been carried out at the European scale, principally through the ICP Vegetation under the UN/ECE Convention on Long-Range Transboundary Air Pollution. The most recent of these (Mills and Harmens, 2011) demonstrates the application of functions based on the phytotoxic ozone dose metric (POD), in contrast to earlier work that focused on use of concentration expressed as ozone concentration accumulated through the growing season at concentrations in excess of 40 ppb (AOT40). Results indicate losses of €3.2 billion and €1.0 billion for wheat and tomato respectively, in 2000. Action to reduce precursor emissions reduces this damage to €1.96 and €0.63 billion respectively, by 2020. POD relationships were not available at the time of writing for other crops, though a POD function is now available for potato.

## 2.3 Willingness to pay

### 2.3.1 Older studies

Markandya (in Externe, 1995) reviewed available studies on ecosystem valuation and found none with relevance to the impacts of energy production or air pollution. Some were too species specific, some focused on very specific ecosystems that demonstrated the WTP method in relation to specific infrastructure projects but did not generate results of wider relevance. Pearce et al (2006) provides a review of the use of the ecosystem services approach and its relevance to environmental CBA, but at the time had little substantive and

quantitative material to consider. The problems experienced have concerned, particularly:

- Incomplete knowledge of pollution impacts on ecosystems
- Lack of response functions for marginal analysis
- Lack of valuation studies on marginal change

Brink and van Grinsven (2011) reviewed the state of science in this area for the European Nitrogen Assessment. They noted that the TEEB-COPI study (Braat and ten Brink, 2008) listed only three studies that provide data to derive unit cost values for ecosystem services linked to N. A value of €2.2/kg N was given for 'Water purification and waste management' both for scrubland and grassland, and €25/kg NO<sub>x</sub>-N for 'Air quality maintenance'. Pretty et al. (2003) quantified costs of freshwater eutrophication in England and Wales. Brink and van Grinsven noted two problems with this study, that it mixed control and damage costs, and made no distinction between the effect of N and phosphorus. Söderqvist and Hasselström (2008) estimated WTP for a clean Baltic Sea, updating results from Contingency Valuation surveys in the 1990s. In this survey a random sample of respondents was questioned about their Willingness to Pay (WTP) for a Baltic Sea 'undisturbed by excessive inputs of nutrients'. The causality and share of N for eutrophication of the Baltic Sea was not made explicit, but instead the WTP for the Baltic Sea objective was made equivalent to a reduction of 50% of the N-load. Values ranged from €70 to 160 per household for the Eastern Baltic States with lower GDP, and between €500 and 800 per household for the Baltic States with high GDP. Gren et al (2008) report a range of unit damage costs of 12–24 euro per kg N based on Söderqvist and Hasselström (2008), using different discount rates.

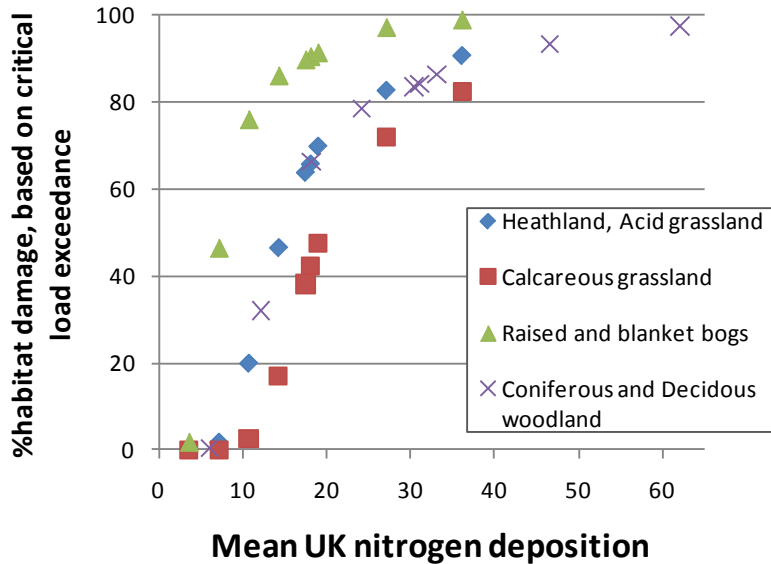
For this reason alternative methods (as described below, repair costs and regulatory revealed preference) have also been considered by some authors – not regarding them as superior to a willingness to pay approach so much as accepting that the data necessary for a WTP assessment were unavailable and that ecosystem impacts should be factored into assessment.

### 2.3.2 Jones et al (2013)

Jones et al (2013) for UK government provides the most detailed and extensive of recent economic assessments of air pollution and ecosystems for the purposes of linking to the outputs of ECLAIRE activities. The pollution scenarios considered are specific to the UK, though this is not of great concern here, as we are here concerned with the approaches used, not so much existing results. Analysis demonstrates the application of the results of a study by Christie et al (2006, 2011) that considered the valuation of changes in biodiversity in the UK, work originally undertaken as input to the review of the UK's Biodiversity Action Plan (BAP).

Jones et al followed an impact pathway approach to assess impacts on biodiversity. In a first stage, response curves were generated to show %habitat damage against N deposition (Figure 4). This was valued using data selected

from Christie et al (2011). Christie provides data for a number of ecosystem services (an illustrative set is provided in Table 1. The options investigated by Christie were WTP to ensure the then current BAP was implemented, and WTP for an enhanced BAP. Jones et al took the values for ‘non-charismatic species’ (£88/household/year for implementation of the current BAP, £44/household/year for the enhanced BAP) and scaled across the ranges for critical loads exceedance as shown in Figure 5<sup>8</sup>.



**Figure 4. Response curves for %habitat damage (based on critical load exceedance) against mean UK nitrogen deposition (kg N ha<sup>-1</sup> yr<sup>-1</sup>).**

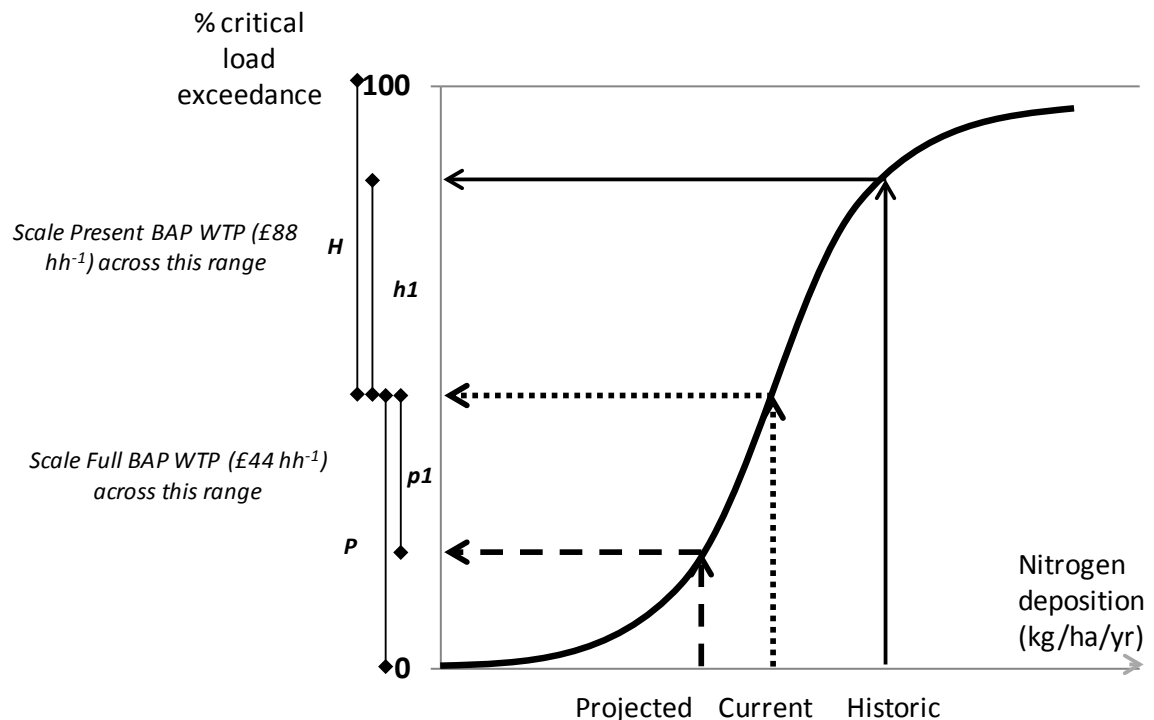
**Table 1. Estimated WTP for ecosystem services delivered by BAP habitats within the respondents’ own regions of the UK (Christie et al, 2011)**

Ecosystem service attribute	BAP scenario	UK (pooled model) (£ per household per year)
Wild food	Increased spend	£34
	Current spend	£79
Non food products	Increased spend	£40
	Current spend	£53
Climate regulation	Increased spend	£98
	Current spend	£168
Water regulation	Increased spend	£80
	Current spend	£150
Sense of place	Increased spend	£89
	Current spend	£71

<sup>8</sup> For consistency with the original studies, we retain use of UK £ here. At the time of the study the exchange rate was €1.18/£.

Charismatic species	Increased spend	£108
	Current spend	£115
Non-charismatic species	Increased spend	£44
	Current spend	£88

Source: Table 15; Christie et al. (2011).



**Figure 5. Method for scaling WTP values across critical load exceedance ranges.**

**Notes:** Estimated WTP from Christie et al. (2010) was scaled linearly across the range of percentage damage as follows: For projected declines in N deposition, WTP of £44 per household was scaled by progress towards a state of zero exceedance from current levels of damage ( $£44 * p1 / P$ ). For historical emissions where N deposition, and therefore habitat damage were higher in the past, the difference between current damage and 100% habitat damage was used ( $£88 * h1 / H$ ).

The linkage of the response curve and valuation is a significant improvement on the other methods considered here.

Christie et al (2011) reports an expert weighting of the importance of different habitat types for the delivery of each ecosystem service. For the habitats of interest to Jones et al (considering that their analysis was concerned only with air pollution threats) this weighting combined to a proportion of 0.479 of the available weighting, and hence only this proportion of the total WTP of £44/£88 per household was applied. The use of habitat specific WTP values enabled separate calculation of % damage using habitat-specific critical loads data and WTP for each habitat, again, a significant advantage over the other methods considered.

At first sight, Jones' analysis might be thought of as assuming that recovery of ecosystems would occur without time lag, immediately following the decline in N



deposition. This would clearly be unrealistic. However, lag effects are implicit to the valuation of Christie et al as some lag should have appeared implicit to respondents to the WTP survey, not least as it considered two scenarios of improvement (current and extended UK BAP).

Results from Jones et al are repeated in Table 2, demonstrating the range of ecosystems considered and the relative importance of damage to each under historic and projected emissions. [For the purpose of comparison with later results in this paper select the annualised estimates (EAV – Equivalent Annual Values) shown.]

**Table 2. Estimated value of air pollution impact on appreciation of biodiversity (present value and equivalent annual value) (£ million).**

Air pollution impact	Habitat	Scenario	
		<i>Historical emissions (1987 – 2005) vs. baseline</i>	<i>Projected emissions (2005 - 2020) vs. baseline</i>
Nitrogen impact on biodiversity	Woodland	PV: £143m £20.7m to £266m EAV: £10.8m £1.8m to £20.5m	PV: £27.6m £4.0m to £52.5m EAV: £2.4m £0.3m to £4.5m
	Heathland	PV: £362m £51.7m to £671m EAV: £27.4m £4.0m to £50.3m	PV: £221m £31.9m to £410m EAV: £19.1m £2.7m to £35.7m
	Acid grassland	PV: £55.2m £7.9m to £102m EAV: £4.2m £0.6m to £7.8m	PV: £33.7m £4.8m to £62.8m EAV: £2.9m £0.4m to £5.3m
	Calcareous grassland	PV: £333m £48.1 to £1,016m EAV: £25.3m £3.6m to £47.0m	PV: £433m £63.3m to £778m EAV: £37.6m £5.4m to £68.1m
	Bogs	PV: £263m £37.6m to £810m EAV: £19.9m £2.8m to £36.1m	PV: £31.0m £4.4m to £57.4m EAV: £2.7m £0.4m to £4.8m
	Total	PV: £1,156m £167m to £2,141m EAV: £87.7m £13.1m to £163m	PV: £745m £107m to £1,357m EAV: £64.7m £9.2m to £121m

Notes: PV = present value benefit, estimated applying Green Book guidance for discounting (HM Treasury, 2003); EAV: equivalent annual value. Figures provided are left in original currency, exchange rate for the year of survey approximately €1.18/£.

### 2.3.3 Variations on the scaling of WTP approaches to air pollution metrics

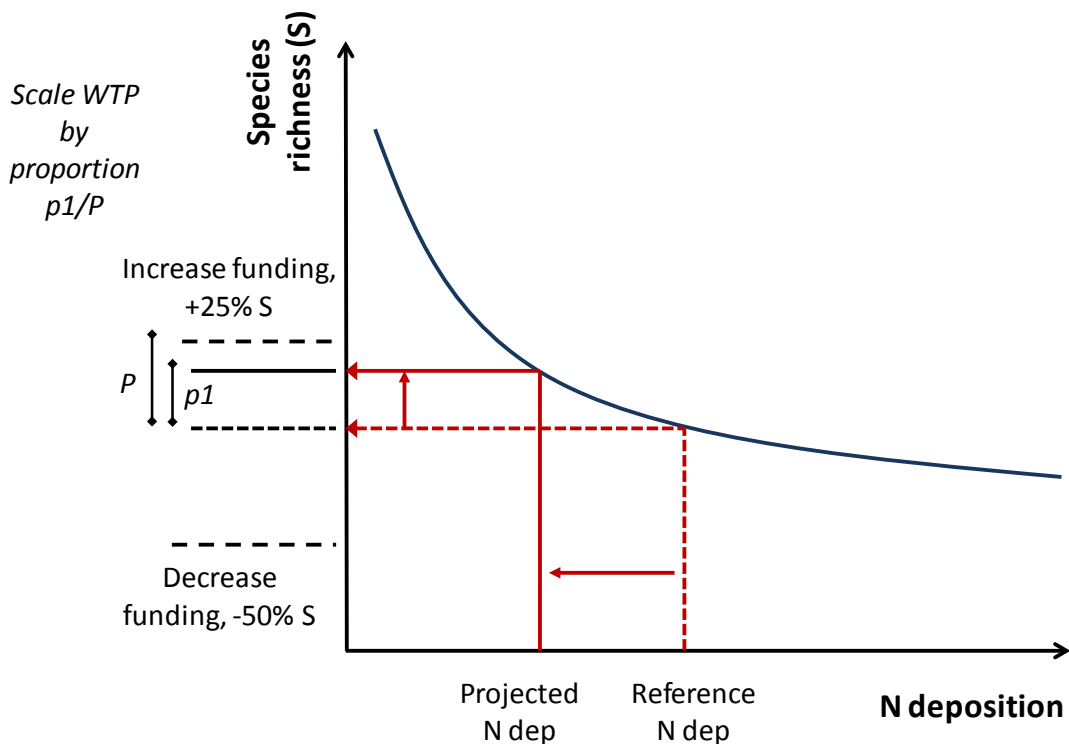
As noted above, Jones et al (2013) used WTP values from Christie et al (2011) to scale impact according to critical load exceedance (Figure 5). Subsequent work has focused on more explicit linkages of WTP values to changes in species richness.

Value transfer scaling according to changes in species richness can be based on another valuation study by Christie et al. (2012) which looked at WTP to manage UK protected areas (Sites of Special Scientific Interest – SSSIs) under different funding scenarios. They conducted a choice experiment for selected attributes related to ecosystem services, including changes in plant and animal species. These species attributes were framed explicitly in terms of a percentage change in the populations or range of threatened species (Table 3). The clear description of the choice outcomes allows direct linkages across to measures of damage due to air pollution. As a result, it is possible to directly scale changes in species richness to WTP estimates, as illustrated in Figure 6. Using this approach, a percentage change in species richness, calculated from absolute or relative values species richness changing in response to N deposition is scaled according to the 25% increase (assumed direction of response to falling N deposition levels) or 50% decrease (assumed direction of response to increasing N deposition levels) specified in the WTP study.

**Table 3. Components of the choice experiment by Christie et al. (2012) framing the consequences for non-charismatic and for charismatic species under different funding scenarios.**

<b>Attribute</b>	<b>Increase SSSI funding</b>	<b>Maintain SSSI funding</b>	<b>Remove funding</b>
Non-charismatic species	25% increase in the population or range of threatened species	No change in the population or range of threatened species	50% decline in the population or range of threatened species
Charismatic species	20% increase in the population or range of threatened species	No change in the population or range of threatened species	55% decline in the population or range of threatened species

One approach for modelling changes in biodiversity in response to changing air pollution is that of ‘habitat suitability’ broadly defined as the levels of nitrogen and sulphur pollution which would support a defined list of typical or appropriate indicator species for a habitat type. In principle, a response function could also be developed to provide read across from WTP studies such as Christie et al. (2012) to changes in the habitat suitability metric with changes in nitrogen or sulphur deposition.



**Figure 6. Scaling WTP for changes in species richness according to funding scenarios from Christie et al. (2012).**

## 2.4 Restoration cost approach

Recognising that the omission of damage to ecosystems was a major gap in the ExterneE toolset, Ott et al (2006, under the NEEDS Project) presented an approach for assessing biodiversity losses due to energy production, including effects of  $\text{SO}_2$ ,  $\text{NO}_x$  and  $\text{NH}_3$  based on the use of repair costs. The use of repair costs has a distinct advantage over other methods in being able to utilise cost data from the real market of ecosystem restoration, though it is not without its problems. Analysis was performed in two stages:

1. Assessment of the 'potentially disappeared fraction' (PDF) of species due to pollutant deposition, drawing on previous studies by Eco-indicator (1999) and Koellner (2001).
2. Valuation of estimated PDF changes using a restoration cost approach.

Ott describes the process for determination of the baseline state for a particular land-use as follows:

*The PDF of vascular plant species is expressed as the relative difference between the number of species  $S$  on the reference conditions and the conditions created by the conversion, or maintained by the occupation. Basing on these data, PDF was calculated as follows:*

$$PDF = 1 - S_{use} / S_{reference}$$

where  $S_{use}$  is the species (richness) number of an occupied or converted land use type and  $S_{reference}$  is the average species number in the reference area type. The species number of a specific land use type is standardised for 1 m<sup>2</sup>. This absolute species number is transformed into a relative number using the regional species richness of the Swiss Lowlands [40 species per m<sup>2</sup>] as a reference.

PDF values are then given for a series of different CORINE land types.

For the impact assessment, modelling of the change in PDF was performed by first estimating the Probability of Occurrence (PO) for different plant species in different ecosystem types under different levels of acidification and eutrophication. The PDF is then calculated as

$$PDF = 1 - PO$$

The PDF can be interpreted as the fraction of species that has a high probability of no occurrence in a region due to unfavourable conditions caused by acidification and eutrophication.

Dispersion modelling to describe NO<sub>x</sub>, SO<sub>2</sub> and NH<sub>3</sub> deposition was undertaken using a Dutch model (Natuurplanner), and the changes in deposition were then translated into changes in the PDF drawing on information from Eco-indicator 99 (1999) which contains information for more than 40 types of ecosystems. For the purpose of the modelling, Ott et al considered that a species would be at significant risk ('stressed') if its probability of occurrence was less than a threshold of 2.5%. The number of stressed target species was counted and the results aggregated for the total natural area in the Netherlands, resulting in a percentage of threatened species caused by a specific level of deposition.

In the case of valuing biodiversity losses due to deposition of airborne emissions, the average costs of restoration of more or less natural areas (for which a very broad definition was applied: essentially any area that is not urban) to land use categories with high biodiversity were considered. Cost estimates were based on the cheapest habitat restoration choices available to bring about a significant improvement in biodiversity through the PDF concept. Using German data on restoration costs a marginal cost of 0.49 €/(PDF\*m<sup>2</sup>) was calculated. [The mix of Dutch and German data, and their extrapolation to the European scale, highlights the limited availability of information for this analysis].

Ott et al cite the following assumptions used in the calculation of external costs per kg of air pollutant for different countries:

1. The PDF change per mass of pollutant (PDF/kg deposition per m<sup>2</sup>) as derived for the Netherlands is the same for all European countries.
2. The marginal costs of 0.49 €/(PDF\*m<sup>2</sup>) calculated for Germany need only be corrected by purchasing power (PPS) to be valid for other countries as well.

3. Degradation (a change in PDF) only takes place on natural land. According to ten Brink et al (2000), natural land encompasses all CORINE land use classes except the classes 1 (artificial areas) and 2 (agricultural areas) (for a CORINE list, see Koellner 2001).
4. The background level of acidification and eutrophication of the respective country influences the impact of additional depositions on biodiversity and hence the resulting external costs.

Ott et al then presented results in terms of external costs per unit of PDF change and per kg deposition of sulphur and nitrogen. It is understood that these results account for the fraction of natural areas within each country, and hence that the total damage per country can be estimated by multiplying the figures shown by total national deposition (see Table 15 of Ott et al). Results for NO<sub>x</sub> and NH<sub>3</sub> are shown in Table 4. Finally, they sought to validate their results using information from available WTP studies.

**Table 4. External costs per kg deposition for NO<sub>x</sub> and NH<sub>3</sub>, PPP adjusted, €/kg for 2004.**

	NO <sub>x</sub>	NH <sub>3</sub>
EU25	0.75	1.88
Austria	1.51	3.91
Belgium	0.96	2.49
Bulgaria	0.06	0.35
Croatia	0.65	1.55
Cyprus	0.01	0.08
Czech Republic	0.54	1.41
Denmark	0.40	1.13
Estonia	0.50	2.16
Finland	1.36	1.43
France	0.48	1.87
Germany	1.41	3.81
Greece	0.02	0.09
Hungary	0.40	0.92
Ireland	0.14	0.28
Italy	0.53	2.08
Latvia	0.23	1.22
Lithuania	0.21	0.66
Luxembourg	1.55	4.03
Malta	0.70	2.73
Netherlands	1.15	3.14
Poland	0.53	1.44
Portugal	0.06	0.35
Romania	0.10	0.45
Slovakia	0.79	1.80
Slovenia	1.42	3.37
Spain	0.06	0.28
Sweden	1.10	0.65
United Kingdom	0.48	0.12

The authors recognised problems with the use of their results, for example:

- The approach assumes that the cost of replacing an ecosystem or its services is an estimate of the value of the ecosystem or its services. To the extent that restoration is applied, the cost of restoration can only be regarded as a minimum estimate. To the extent that restoration is not applied, a conclusion may be that the costs exceed the benefits of action, that benefits have been underestimated (qualitatively or quantitatively), or simply that funding for restoration is unavailable.
- The approach is not based on individual preferences but on an ecological or expert standard and the cost to re-establish this standard.
- Proposed interventions may not be a perfect substitute for the lost ecosystem service, e.g. existence values of certain species or ecosystems are not replaceable.
- Some damage may not be recognised immediately, or, like the effects of gradual eutrophication of ecosystems, may take many years to reach steady state.
- Restoration may bring a variety of benefits that are not recognised through the restoration costs (Pearce and Moran, 1994).

The use of damage cost data implies that the marginal response to a change in deposition will be to alter the level of restoration being undertaken. For the analysis presented below, this assumption seems reasonable at least for the protection of Natura 2000 sites which should be ensured as a consequence of existing legislation.

The question remains as to how much of the impact on 'biodiversity' is valued using the repair cost approach. For estimation of externalities of air pollution on buildings, including buildings of cultural merit, Rabl (1999) and Rabl et al (2014) argue that the social optimum is to undertake action when the repair costs are equivalent to loss of amenity. The total cost is then twice the repair cost. This could be factored into the current analysis by presenting a range, with the upper bound double the estimate based on the approach used by Ott et al. Of course, this assumption implies that we have some understanding of amenity losses, at least in qualitative terms.

The European Nitrogen Assessment (Sutton et al, 2011) provides a thorough review of the sources, flows and impacts of nitrogen in the European environment. Chapter 22 of the Assessment (Brink et al, 2011) provides information on costs and benefits. Results are shown in Table 5. The lower bound for ecosystem damage (also adopted as the best estimate) was based on the costs of restoring biodiversity loss due to reactive nitrogen deposition estimated by Ott et al (2006). The upper bound was arbitrarily set 5 times higher as a possible value when using an ecosystem service approach.

**Table 5. Unit damage costs as €/kg reactive nitrogen for the major N<sub>r</sub> pollutants. Upper figures, best estimate, lower figures range. From Brink et al (2011).**

<b>Pollutant</b>	<b>Health</b>	<b>Ecosystems</b>	<b>Climate</b>	<b>Total</b>
N <sub>r</sub> to water	1 0 – 4	12 5 – 20		13 5 – 24
NH <sub>3</sub> -N to air	12 2 – 20	2 2 – 10		14 4 – 30
NO <sub>x</sub> -N to air	18 10 – 30	2 2 – 10		20 12 – 40
N <sub>2</sub> O-N to air	2 1 – 3		9 5 – 15	11 6 – 18

There is a question whether the results of Ott et al are consistent with this table, as they are expressed per kg of NO<sub>x</sub>, NH<sub>3</sub> deposited, rather than emitted. This is moderated in the table by the selection of the lower end of the range as the best estimate.

These estimates for ecosystem damage, being based around the Ott et al study, suffer the same deficiencies. Further to this, the figures adopted do not differentiate by location of source within Europe, for which there can be a great deal of variation. If, for example, nitrogen is released in an area with little or no exceedance of critical loads, damage is anticipated to be zero or close to it. For health impacts variation of about a factor 10 has been identified between average damage costs for different countries for various pollutants (EEA, 2011) and the same may well be true for impacts to ecosystems.

As an aside, it is noted that the health values given by Brink et al were taken from ExternE (2005). These values would ideally need revision now, following work undertaken by WHO-Europe on the REVIHAAP and HRAPIE studies (WHO, 2013 a, b) and changes made to the EMEP modelling. The costs of climate change were based on a range of €10 – 30 tonne CO<sub>2</sub>, reflecting variation in the carbon price since 2005. Again, alternative positions are available, for example using results from Stern (2006). The European Environment Agency has recently adopted a range of €9.5 to 38.1/t CO<sub>2</sub> (2005 prices) reflecting values for the EU Emissions Trading Scheme used in policy modelling by the European Commission (EEA, 2014), values that are not dissimilar to those used by Brink et al.

### 3 Overview of methods for analysis

#### 3.1 Broad approaches for quantification

Following a workshop of this Work Package held at RIVM in December 2013, it was decided to investigate the use of three different approaches to the quantification of damage to natural ecosystems.

The first of these is based on available information from stated preference studies on 'willingness to pay' (WTP) for protection of biodiversity, drawing on Christie et al (2011) and Jones et al (2013). The second is based on use of repair costs drawing on the results of Ott et al (2006), and the third on the inferred costs of environmental policies. The methods based on repair costs and inferred costs of policies are both 'revealed preference' approaches.

It was also decided that the work should focus initially on Natura 2000 areas, for which there is a legal responsibility on Member States to preserve, maintain and restore.

Each of the methods is applied in the following three chapters, with results considered together at the end of the report.

It is stressed at this point that the stated preference WTP methods forming the first approach are the preferred option for quantification as they best reflect accepted environmental economic methodology (including those used for quantification of health benefits by Holland, 2014). However, data availability is very limited, and so it is useful also to test the other approaches to see what additional information they can provide.

#### 3.2 WTP for protection of biodiversity (stated preference)

The analysis here is based on the results of the Christie et al study (2006, 2010, 2011) designed to inform the development and appraisal of the UK's biodiversity Action Plan (UK BAP). Christie's work provides estimates of household WTP for environmental protection, and hence reflect preference from the perspective of the general public.

Of the studies available it is considered most appropriate to the needs of the present work for several reasons, for example:

1. it deals with WTP for a change in status of the ecosystems under investigation
2. It recognises that different types of ecosystem will be valued differently
3. It is aligned to a degree with the ecosystem services concept
4. It is European.

Against this, it is a single study (albeit part of a series), investigating valuation in a single country. Accepting this, there is a need to consider whether there is



information available that would improve the process of value transfer from the UK to the whole EU. Different types of data are considered, below, for this process, including information on GDP/capita and environmental expenditures.

### 3.3 Restoration costs (revealed preference)

Ecological restoration is applied extensively already, for example to the Dutch Heathlands. The concept behind this approach is that the costs of restoration reflect societal WTP for improved protection of biodiversity.

To the extent that restoration is undertaken it can reasonably be said that associated costs provide some insight, but only as a minimum estimate (minimum on the basis that WTP has to be at least as large as the restoration cost for action to be carried out, but could be larger). The need to restore indicates that some level of damage has occurred that society finds unacceptable, and this has a cost: one would not restore for the simple sake of restoration. Rabl (1999) considers a similar issue for buildings maintenance, considering the amenity loss from soiling. If restoration costs were higher than the amenity loss it is argued that the restoration would not be performed. Total costs (restoration + amenity) can, however, be minimised by restoring at the point where amenity losses are equal to restoration costs. Hence, assuming society acts to minimise cost:

$$\text{Total damage cost} = 2 \times \text{restoration cost}$$

$$\text{Amenity loss by time of restoration} = \text{restoration cost}$$

Of course, soiling of buildings and eutrophication damage to ecosystems have a number of differentiating characteristics. Not least is the fact that building soiling will be witnessed day in, day out until the building occupier decides that action is needed. For ecosystems, however, damage may go undetected for a long time. This may imply that Rabl's factor 2 is likely to be too low. This adds some weight to the factor 5 adopted by Brink and van Grinsven.

There are several problems with the restoration cost approach, including:

- The concept of restoration is questionable. After restoration an ecosystem may look the same as it was originally. However, even where species are reintroduced successfully there will be a loss of genetic stock. This can bring its own problems: a restricted genetic stock has been identified as a major risk factor for the spread of certain diseases including Ash Dieback. The fine detail (for example the range of soil invertebrates present) will also be different. Hence there is a real question of the extent to which restoration goes beyond the cosmetic.
- The definition of 'restored' requires some reference position to be adopted. This may require some rather arbitrary decisions to be taken (as implied by Ott et al's referencing to the Swiss lowlands). One possible reference point might be thought of as the date at which legislation such as the Birds and

Habitats Directives were passed. However, the driver for this legislation was environmental degradation, so conditions when the Directives were passed will not represent the undamaged state.

- There is a question of whether society will think that restoration is worthwhile. If a site is not restored the WTP for its protection can be concluded to be lower than the restoration cost. This problem is partially overcome by limiting analysis to Natura 2000 sites because of the legal mandate that they should not be allowed to deteriorate, which is not met whilst critical loads and levels are exceeded.

However, seen as providing an alternative perspective to that gained from the other methods used here, this approach is accepted for the purposes of the present report.

### 3.4 Regulatory revealed preference

This third approach takes the view that the costs of meeting critical loads in Natura 2000 areas are implied in the Birds and Habitats Directives. Continued emissions at current levels will lead to continued exceedance, and hence the requirement that Natura 2000 sites should not be allowed to deteriorate will not be met. Alongside the more local NH<sub>3</sub> deposition there is a need to also consider (large scale) NO<sub>x</sub>-reduction.

The valuation can be carried out by considering the costs of scenarios modelled using GAINS and the extent to which N emissions need to be reduced to meet the critical load for eutrophication. In some areas it is possible that rather small reductions in emissions may be sufficient, but in many the required emission reduction may exceed what is possible using IIASA's Maximum Technically Feasible Reduction scenario. The potential for smaller reductions in emissions in some is could be investigated in subsequent scenario analysis with the GAINS model. Some of the measures included in the GAINS model are extremely expensive per unit emission avoided. A further sensitivity that could be explored would be the possibility that a small level of exceedance (say 10% or 20%) could be easily avoided through nature management measures.

Of course, our analysis deals with the costs of environmental damage rather than the costs of abatement in each country. This should ideally be recognised in the way that inferred damage costs are attributed to each country.

As will be shown, application of all abatement measures within GAINS is insufficient to attain full compliance with critical loads. Then, the costs of additional measures need to be considered. A possibility would be to control livestock farming in affected areas, and some estimate of the cost of this can be made from data on the annual value of livestock production.

Again, there are several potential problems with this approach, for example:

- The Birds Directive was first adopted in 1979, and the Habitats Directive in 1992. It is not clear to what extent the policy makers involved in this process were aware of the threats posed by nitrogenous air pollutants.
- It is unclear to what extent subsequent revisions of the Directives have paid attention to damage caused by air pollution, though the 7th Environmental Action Programme of the European Commission reconfirms the need of meeting critical loads (no significant damage to ecosystems) by 2050. However, to the extent that some policy makers may have been aware of the threat of air pollution, they may have regarded it as being dealt with directly through air pollution legislation and hence not of their concern.
- Existing air quality policies are developed against health, as well as ecological objectives.

Again, issues are partially offset by considering the approach not in isolation, but as providing an alternative perspective to the methods discussed above. The approach is also useful for stressing the difficulty in ensuring the health of sites designated for protection given the burdens imposed by transboundary air pollution.

## 4 Willingness to pay approach

### 4.1 Methods and data

As noted above, this approach is based on use of WTP estimates for ecological protection taken from the work of Christie et al (2011) which provides the valuation input to the work of Jones et al. It should be noted that at the present time it has not proved possible to factor species richness (Figure 6) into the analysis, though this work continues. Although the valuation work is only from the UK it is considered here to be the most relevant analysis based on accepted environmental economic methods that is available from the European literature, given the fact that it considers WTP for specific changes in ecological protection and considers a variety of types of ecosystem.

The selection of the appropriate WTP estimate from Christie et al is open to debate. For the purposes of illustration, this paper takes the estimate of €10-30 per household per year adopted for analysis by Maas (2014) for presentation to the 2014 meeting of ICP Mapping and Modelling. This is representative of WTP for 'non-charismatic' species in the area local to one's home ('within own region' as expressed by Christie et al), selected also by Jones et al as an indicator of the WTP to protect 'biodiversity'.

There are two ways that this figure could be extrapolated to other countries (leaving aside, for the moment, the major issues of value transfer here relating to different incomes in different countries and differences in appreciation of nature between countries). The first is to assume that an average household is willing to pay €10-30 per household per year for nature protection, the second that WTP will vary according to the area of ecosystems at risk, in line with the equivalent UK valuation per unit area. Applying results per household suggested very high valuations per unit area in some countries where there was limited exceedance of the critical load over nature areas. Accordingly, a valuation of €80 to 240/ha/yr was calculated, applying the household WTP described above to the area of protected UK sites at risk. This was applied to protected sites at risk in all countries, using data from the Current Legislation (CLE) and Maximum Technically Feasible Reduction (MTFR) scenarios for 2025 and 2030 considered in the development of the Clean Air Policy Package of December 2013. No consideration was given to unprotected sites, recognising that the Christie et al work was performed against the background of the UK's Biodiversity Action Plan. Further refinements to the analysis are discussed below.

### 4.2 Results

Results based on applying a common value per hectare of protected land at risk through exceedance of the critical load for eutrophication of €80 are shown in Table 6. Table 7 is similar, but takes a valuation of €240/ha reflecting the factor 3 variation across the range cited above.

**Table 6. Estimated costs of exceedance of critical loads over Natura 2000 sites in Europe for estimated WTP of €80/ha. Italicised lines show countries for which data on protected areas are approximated.**

Country	CLE, €M/year	MTFR, €M/year	Benefit, €M/year		CLE, €M/year	MTFR, €M/year	Benefit, €M/year
	2025	2025	2025		2030	2030	2030
<i>Austria</i>	46	17	30		43	14	29
<i>Belgium</i>	0	0	0		0	0	0
<i>Bulgaria</i>	101	82	19		101	82	19
Croatia	0	0	0		0	0	0
Cyprus	6	6	0		6	6	-
Czech Rep.	6	3	2		5	3	3
Denmark	13	12	1		13	12	1
Estonia	13	7	6		13	7	7
Finland	5	4	2		5	4	1
France	700	401	299		678	379	299
Germany	329	194	135		321	183	137
Greece	132	128	3		131	128	3
Hungary	84	71	13		82	71	11
Ireland	0	0	0		0	0	0
Italy	252	150	102		242	139	103
Latvia	34	27	8		34	26	8
Lithuania	43	39	4		43	39	4
Luxembourg	3	2	0		3	2	0
Malta	0	0	0		-	-	-
Netherlands	31	28	3		31	28	4
<i>Poland</i>	305	206	99		301	193	108
Portugal	74	66	8		74	66	8
Romania	163	146	17		162	143	19
Slovakia	75	67	8		74	65	9
Slovenia	11	2	9		9	1	8
Spain	703	617	86		701	605	96
Sweden	9	6	3		8	5	3
<i>United Kingdom</i>	36	12	24		35	11	24
<b>EU-28</b>	<b>3175</b>	<b>2294</b>	<b>881</b>		<b>3,116</b>	<b>2,211</b>	<b>905</b>

Some consideration is given below as to how these figures may be adjusted for different countries. However, it is noted already that further thought could be given as to whether this should just apply to Natura 2000 areas only, or to all ecosystems, and whether it is possible to define a price elasticity according to abundance per capita (with increased abundance generating a lower value per hectare). In favour of adoption of a standard price across the EU is the fact that Natura 2000 is essentially transboundary in defining 'European heritage'. Against this view, there is very limited (via the LIFE programme) funding for management of Natura 2000 at the EU level. Further consideration will be given to price elasticity, though it requires further data than were available here.

**Table 7. Estimated costs of exceedance of critical loads over Natura 2000 sites in Europe for estimated WTP of €240/ha. Italicised lines show countries for which data on protected areas are approximated.**

Country	CLE, €M/year	MTFR, €M/year	Benefit, €M/year		CLE, €M/year	MTFR, €M/year	Benefit, €M/year
	<b>2025</b>	<b>2025</b>	<b>2025</b>		<b>2030</b>	<b>2030</b>	<b>2030</b>
<i>Austria</i>	239	131	108		230	123	106
<i>Belgium</i>	1	0	0		1	0	0
<i>Bulgaria</i>	308	251	57		308	251	57
Croatia	6	4	3		6	3	3
Cyprus	32	31	1		32	31	1
Czech Rep.	30	16	14		29	15	15
Denmark	44	41	3		43	40	3
Estonia	741	423	318		718	399	320
Finland	345	206	140		336	194	142
France	2232	1331	902		2166	1265	901
Germany	1072	654	418		1043	620	423
Greece	395	386	10		394	384	10
Hungary	505	362	142		487	352	136
Ireland	35	27	8		35	27	8
Italy	799	489	310		770	457	313
Latvia	105	82	24		104	81	23
Lithuania	129	117	12		129	117	12
Luxembourg	39	35	4		39	34	4
Malta	305	206	99		301	193	108
Netherlands	167	151	17		167	148	19
<i>Poland</i>	<i>1079</i>	<i>764</i>	<i>315</i>		<i>1065</i>	<i>721</i>	<i>343</i>
Portugal	296	266	30		295	262	33
Romania	499	440	59		494	430	64
Slovakia	927	818	109		921	799	123
Slovenia	40	11	29		36	9	27
Spain	2146	1863	284		2137	1825	313
Sweden	3201	2311	890		3141	2227	914
<i>United Kingdom</i>	<i>109</i>	<i>36</i>	<i>73</i>		<i>106</i>	<i>33</i>	<i>73</i>
<b>EU-28</b>	<b>9525</b>	<b>6882</b>	<b>2643</b>		<b>9347</b>	<b>6633</b>	<b>2714</b>

### 4.3 Adjustment of values by Member State

#### 4.3.1 The need for differentiation by Member State

The need to differentiate unit values by Member State is dependent on the scope of the analysis. For analysis at the European Union level it is common practice to apply uniform values across the EU (as in the analysis of the benefits of reducing air pollution by Holland, 2014, for the Clean Air Policy Package). The assumption of different valuations in different places would run counter to the 'level playing field' philosophy that underpins much EU environmental regulation. On this basis, for decisions made at the EU level, the valuation of health should be consistent throughout the Union, as should valuation of concern for the environment.

However, the same does not apply to valuation for policies implemented at the national level. In that situation it is appropriate to use valuations that reflect national, rather than continental preference. Consider first the situation in a country that has a high WTP for environmental protection. There is no basis for dictating to that country that they should limit environmental expenditure to a level representative of the Union as a whole. Consider then a country that has a low WTP for environmental protection because of low average income. Why should the priorities for protection adopted elsewhere be assumed applicable here also, given that rich and poor may have very different ideas as to what is the most effective use of available resource?

It may be asked whether the proposed use of different approaches at different scales is inconsistent. It is here considered that this is not the case. If the EU as a whole considers that additional environmental protection is desirable it may provide funding for such measures, for example through the EU's LIFE Programme, funding for which is equal to €398 million for 2014<sup>9</sup>.

The factors considered here to provide a basis for adjustment are:

- Average per capita income, reflected through GDP adjusted for purchasing power parity,
- Levels of environmental concern as indicated by Eurobarometer survey data and
- Government expenditure on environmental protection, also as an indication of societal concern.

#### 4.3.2 Adjustment by average per capita income

Table 8 shows variation in GDP per capita across Europe, expressed in purchasing power standards (PPS). PPS adjustment factors out differences in buying power per unit of currency between countries.

The standard approach for adjustment for income between countries to derive an estimate of the value of a good at a policy site ( $V_p$ ) is to multiply the unit valuation from the original study site ( $V_s$ ) by the ratio of income in the new country ( $I_p$ ) divided by income for the original country ( $I_s$ ), raised to the power of the income elasticity of demand for the environmental good in question ( $\beta$ ):

$$V_p = V_s (I_p/I_s)^\beta$$

The income elasticity of demand shows how willingness to pay varies with income. For mortality, OECD (2012a) recommends using an elasticity of 0.8, with a sensitivity analysis using 0.4. The use of an elasticity less than 1 means that people on lower incomes are, as an average across society, willing to pay a greater share of their income on health protection than richer people. However, there is evidence that people see the environment as a luxury good (see, for

<sup>9</sup> [http://ec.europa.eu/environment/funding/pdf/awp\\_2014.pdf](http://ec.europa.eu/environment/funding/pdf/awp_2014.pdf).

example, Martinez-Alier, 1995) where the opposite would apply, that WTP as a fraction of one's income would increase with income. This seems appropriate in relation to pollution impacts where individuals have very little control over impacts (the opposite position to interventions to protect one's own health) and lifestyles are distanced to some extent from ecological quality. Given conflicting evidence on the magnitude of the elasticity, a core value of 1 and sensitivity value of 1.5 are therefore adopted in the analysis shown at the end of this section.

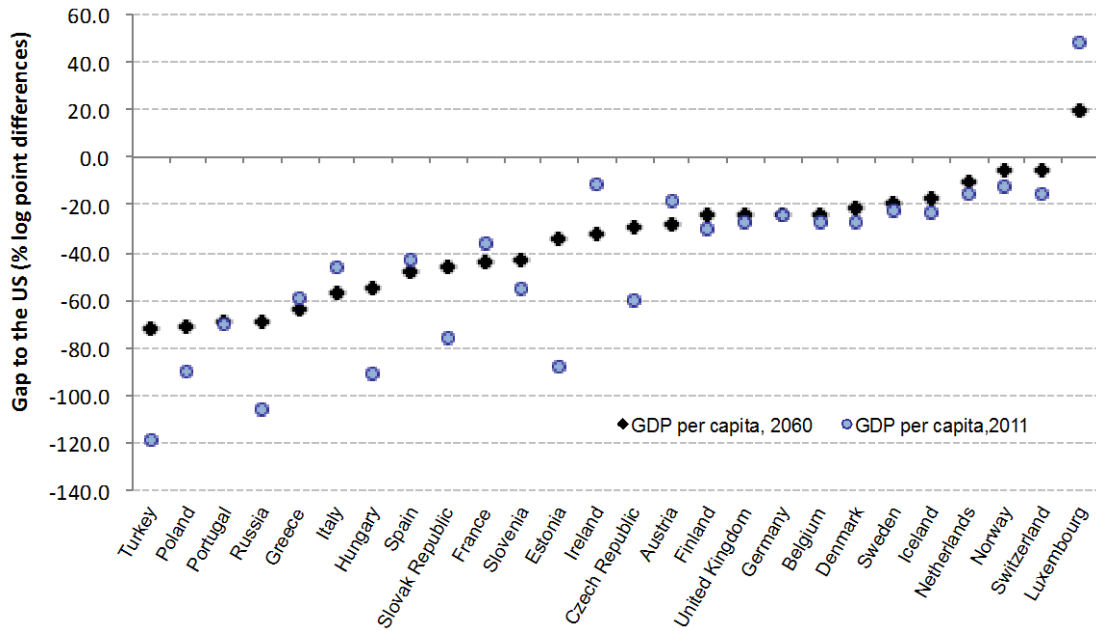
**Table 8. Variation in GDP per capita, purchasing power standards (EU28 = 100), for 2005, 2010 and 2012**

	2005	2010	2012
<b>EU (28 countries)</b>	<b>100</b>	<b>100</b>	<b>100</b>
Austria	125	127	130
Belgium	120	121	120
Bulgaria	37	44	47
Croatia	57	59	62
Cyprus	93	97	92
Czech Republic	79	81	81
Denmark	124	128	126
Estonia	62	64	71
Finland	114	114	115
France	110	109	109
Germany	116	120	123
Greece	91	88	75
Hungary	63	66	67
Ireland	144	129	129
Italy	105	103	101
Latvia	50	55	64
Lithuania	55	62	72
Luxembourg	254	263	263
Malta	80	87	86
Netherlands	131	130	128
Poland	51	63	67
Portugal	80	80	76
Romania	35	48	50
Slovakia	60	74	76
Slovenia	87	84	84
Spain	102	99	96
Sweden	122	124	126
United Kingdom	124	108	106
<b>Non EU</b>			
Albania	22	26	30
Bosnia and Herzegovina	25	29	29
Iceland	130	115	115
Montenegro	31	42	41
Norway	178	181	195
Serbia	32	35	36
Switzerland	137	152	158
TFYR Macedonia	29	36	35



Turkey	42	50	54
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A further factor to take into account given the timescales that are relevant to ECLAIRE, is differential change in income across the EU between now and the middle of the century. OECD (2012b) provides some insight on trends (see Figure 7) with disparity in GDP per capita forecast to close significantly for many of the lower income EU Member States. Global GDP is forecast to grow at 3% per annum, with a lower rate of 2% in OECD countries.



**Figure 7. Change in GDP per capita relative to the USA. Data source: OECD, 2012b.**

This reduction in economic disparity across the EU will lead to an increase in valuations by the time of the ECLAIRE scenarios. This should be accounted for in the analysis, though requires conclusions to be reached on the appropriate level of income elasticity. Such adjustment is not carried out below but should be considered for the future.

Results are presented, adjusted for income, in Section 4.3.5.

### 4.3.3 Levels of environmental concern

Eurobarometer surveys provide an indication of public attitude across the EU. Special Eurobarometer 365 was focused on attitudes to the environment. Results indicate that more than 90% of people in all countries considered environment to be very or fairly important. There is more differentiation in the results when considering the ‘very’ and ‘fairly’ important categories separately, with results for ‘very important’ ranging from 44% (Austria and Finland) to 89% (Cyprus). Ignoring the strength of response it is notable that 95% of respondents consider the environment to be important.

**Table 9. National results of survey: How important is the environment to you personally? (adapted from Eurobarometer, 2011)**

<b>Importance</b>	<b>Very</b>	<b>Fairly</b>	<b>Not very</b>	<b>Not at all</b>	<b>Don't know</b>	<b>Total important</b>	<b>Total not important</b>
Austria	44	46	8	2	0	90	10
Belgium	62	33	4	1	0	95	5
Bulgaria	79	19	1	0	1	98	1
Cyprus	89	11	0	0	0	100	0
Czech Republic	60	35	5	0	0	95	5
Denmark	60	36	4	0	0	96	4
Estonia	54	40	5	0	1	94	5
Finland	44	49	6	1	0	93	7
France	62	35	2	1	0	97	3
Germany	51	44	4	1	0	95	5
Greece	70	28	2	0	0	98	2
Hungary	64	32	4	0	0	96	4
Ireland	60	34	4	2	0	94	6
Italy	61	33	4	2	0	94	6
Latvia	53	42	4	1	0	95	5
Lithuania	59	35	5	0	1	94	5
Luxembourg	72	24	3	0	1	96	3
Malta	86	14	0	0	0	100	0
Netherlands	50	43	6	1	0	93	7
Poland	47	45	5	1	2	92	6
Portugal	51	44	5	0	0	95	5
Romania	56	36	5	1	2	92	6
Slovakia	57	38	4	0	1	95	4
Slovenia	80	18	1	1	0	98	2
Spain	56	38	4	1	1	94	5
Sweden	83	15	1	1	0	98	2
UK	58	36	5	1	0	94	6
<b>EU 27</b>	<b>58</b>	<b>37</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>95</b>	<b>5</b>

Adjustment of values by the expressed levels of environmental concern raises the question of what factors cause people to consider the environment as very important. There seems to be potential for rather low numbers expressing a high level of importance in two very contrasting situations:

- Countries where environmental quality is good
- Countries where environmental quality is poor, but policy debates are focused on other issues

In the first case it is quite possible that environmental quality is good because citizens have a high WTP for environmental protection. In the second, there should be a lower WTP. Hence adjustment according to the results of Table 9 may generate some misleading results and is not adopted.

Eurobarometer also asked people to state what they thought of when people spoke of 'the environment'. Results are shown in Table 10. Respondents were split into two groups who were asked the same questions with one exception. Group A were asked to consider 'Protecting nature' and Group B were asked to

consider 'Protecting biodiversity'. Results are starkly different, with Group A ranking 'Protecting nature' most highly and Group B ranking 'Protecting biodiversity' lowest. This outcome is relevant quite generally to the work of ECLAIRE, in terms of needing to communicate the nature of impacts effectively with members of the public. It also raises issues for the effective construction and framing of surveys to investigate willingness to pay for environmental protection.

**Table 10. Results of survey: What do you think of when people refer to 'the environment'? (adapted from Eurobarometer, 2011)**

	Group A	Group B
Protecting nature (Group A)/biodiversity (Group B)	47%	20%
The state of the environment our children will inherit	41%	45%
Climate change	40%	41%
Pollution in towns and cities	39%	42%
Man made disasters (oil spills, etc.)	39%	41%
The quality of life where you live	33%	37%
Using up natural resources	31%	34%
Green and pleasant landscapes	28%	31%
Natural disasters (earthquakes, floods, etc.)	26%	28%
Other / don't know	4%	4%

#### 4.3.4 Government expenditure on environmental protection

Eurostat (2014) provides information on environmental expenditures by business and government. The former are likely to have expenditure dominated by legislated requirements (e.g. emission controls to meet regulatory limits) and so have not been considered. Data for expenditures by government are included below, however (Table 11). Results show a great deal of variation, reasons for which are unclear. For example, the country with the highest government expenditure per capita is Luxembourg according to this list, with average expenditure more than 5 times higher than Germany. This might suggest inconsistency in the way that data are reported. For this reason it seems inappropriate to apply the data to adjust the earlier WTP estimates.

In the near future (2017) systematic information will be generated by EU Member States through the Environmental Protection Expenditure Accounts (EPEA) required under EU Regulation 691/2011<sup>10</sup>. Some countries have already generated estimates using a similar format, an example for Austria being shown in Table 12. This might provide a basis for adjustment in the future, but at the present time too few countries have provided data for its application here.

<sup>10</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52013PC0247>

**Table 11. Environmental protection expenditure in Europe by government, Euro per capita. Source: Eurostat, 2014**

	2011	Average 2002-2004	Average 2005-2007	Average 2008-2010	Average 2002-2011
<b>EU27</b>	<b>166</b>	<b>131</b>	<b>151</b>	<b>169</b>	<b>152</b>
Austria		210	237	198	217
Belgium		160	150	150	153
Bulgaria	31	8	15	27	18
Croatia	32	8	16	4	12
Cyprus		57			57
Czech Republic	76		52	61	61
Denmark		251	251	283	255
Estonia		14	18	22	18
Finland		164	175	201	180
France		143	162	207	170
Germany		105	99	99	101
Greece					
Hungary	39	50	54	33	45
Ireland					
Italy	229	202	208	224	213
Latvia		5	60	74	46
Lithuania		11	53	96	59
Luxembourg	655	532	570	569	567
Malta	230	137	197	262	202
Netherlands		452	509	516	497
Poland	51	17	30	41	32
Portugal	78	68	73	89	77
Romania	59	5	22	39	26
Slovakia	40	11	22	32	23
Slovenia		134	117	157	136
Spain		51	68	72	64
Sweden	139	101	134	123	121
UK		139			139
<b>Non-EU</b>					
Iceland		118			118
Norway	485	261	334	406	349
Switzerland		334			334
Turkey		12	25	31	23

**Table 12. EPEA account for Austria.**

**Financing of domestic environmental protection expenditure 2011 in million €**

Financing Units	Protection of ambient air and climate	Wastewater management	Waste management	Protection and remediation of soil, groundwater and surface water	Noise and vibration abatement	Protection of biodiversity and landscape	Protection against radiation	R&D Research and development	Other environmental protection activities
Public sector	101.4	350.2	60.4	10.7	1.1	67.7	0.1	0.6	21.6
Non governmental organisations	14.6	1.6	4.0	9.4	0.7	131.4	0.0	3.4	26.2
Households	187.4	679.1	1 123.6	0.0	142.4	17.6	0.0	0.0	602.7
Enterprises	504.9	1 443.9	2 700.9	1 279.1	68.1	543.8	0.0	187.9	931.7
<b>Total</b>	<b>808.3</b>	<b>2 474.7</b>	<b>3 888.9</b>	<b>1 299.2</b>	<b>212.3</b>	<b>760.5</b>	<b>0.1</b>	<b>192.0</b>	<b>1 582.1</b>

S: STATISTICS AUSTRIA, Environmental protection expenditure accounts, on behalf of BMLFUW. Compiled on 14 December 2013.

Source:

[http://www.statistik.at/web\\_en/statistics/energy\\_environment/environment/environmental\\_protection\\_expenditure\\_accounts\\_epea/index.html](http://www.statistik.at/web_en/statistics/energy_environment/environment/environmental_protection_expenditure_accounts_epea/index.html)

#### 4.3.5 Applying adjustment by income

Given the lack of suitable data to adjust the WTP based valuations of Table 6 and Table 7 by some differential of environmental concern between countries, the only form of adjustment applied here is for differences in income. To illustrate the level of variation that this induces we need use only one set of results (Table 6, based on WTP of €80/ha) as the variability identified for that case will be the same proportionally as for the case using a higher baseline estimate of WTP (€240/ha). Results in Table 13 demonstrate the effects of adjustment using the variation in GDP/capita from Table 8 assuming an income elasticity of 1 and 1.5. Adjusted values are lower than the original estimates, but by less than 10%.

**Table 13. Damage and benefit estimates for the EU28 calculated using a WTP of €80/ha for the UK, and income adjusted values with income elasticity of 1 and 1.5.**

	CLE, €M/year	MTFR, €M/year	Benefit, €M/year		CLE, €M/year	MTFR, €M/year	Benefit, €M/year
EU28	2025	2025	2025		2030	2030	2030
Unadjusted	3,175	2,294	881		3,116	2,211	905
Adjusted, elasticity = 1	2,793	1,961	832		2,735	1,884	851
Adjusted, elasticity = 1.5	2,678	1,856	822		2,621	1,781	840

Whilst the aggregated EU28 results show little difference (<10%) as a result of adjustment, there is much more variability between Member States (Table 14). There is also significant variation introduced through different assumptions on elasticity, with variation for some countries in excess of +/-30% (Table 15).

**Table 14. Comparison of results for 2025. Left hand side, unadjusted for income, right hand side, adjusted for income with income elasticity of 1.5.**

Country	CLE, €M/year	MTFR, €M/year	Benefit, €M/year		CLE, €M/year	MTFR, €M/year	Benefit, €M/year
	2025	2025	2025		2025	2025	2025
	Unadjusted				Adjusted		
Austria	46	17	30		63	22	40
Belgium	0	0	0		0	0	0
Bulgaria	101	82	19		30	24	6
Croatia	0	0	0		0	0	0
Cyprus	6	6	0		5	5	0
Czech Rep.	6	3	2		4	2	2
Denmark	13	12	1		17	16	1
Estonia	13	7	6		7	4	3
Finland	5	4	2		6	4	2
France	700	401	299		730	418	312
Germany	329	194	135		412	243	168
Greece	132	128	3		78	76	2
Hungary	84	71	13		42	36	7
Ireland	0	0	0		0	0	0
Italy	252	150	102		234	140	95
Latvia	34	27	8		16	12	4
Lithuania	43	39	4		24	22	2
Luxembourg	3	2	0		10	9	1
Malta	0	0	0		0	0	0
Netherlands	31	28	3		41	37	4
Poland	305	206	99		153	104	50
Portugal	74	66	8		45	40	5
Romania	163	146	17		53	47	5
Slovakia	75	67	8		45	41	5
Slovenia	11	2	9		7	1	6
Spain	703	617	86		606	532	75
Sweden	9	6	3		11	7	4
United Kingdom	36	12	24		36	12	24
<b>EU-28</b>	<b>3175</b>	<b>2294</b>	<b>881</b>		<b>2678</b>	<b>1856</b>	<b>822</b>

**Table 15. Effect of changing income elasticity from 0 to 1.5.**

<b>Country</b>	<b>Elasticity = 0</b>	<b>Elasticity = 1.0</b>	<b>Elasticity = 1.5</b>	<b>Difference</b>
	<b>€M/year</b>	<b>€M/year</b>	<b>€M/year</b>	
Austria	46	57	63	11%
Belgium	0	0	0	6%
Bulgaria	101	45	30	-33%
Croatia	0	0	0	-24%
Cyprus	6	5	5	-7%
Czech Rep.	6	4	4	-13%
Denmark	13	15	17	9%
Estonia	13	9	7	-18%
Finland	5	6	6	4%
France	700	720	730	1%
Germany	329	382	412	8%
Greece	132	93	78	-16%
Hungary	84	53	42	-20%
Ireland	0	0	0	10%
Italy	252	240	234	-2%
Latvia	34	21	16	-22%
Lithuania	43	29	24	-18%
Luxembourg	3	6	10	58%
Malta				
Netherlands	31	38	41	10%
Poland	305	193	153	-20%
Portugal	74	53	45	-15%
Romania	163	77	53	-31%
Slovakia	75	54	45	-15%
Slovenia	11	8	7.44	-11%
Spain	703	637	606	-5%
Sweden	9	10	11	9%
United Kingdom	36	36	36	0%
<b>EU-28</b>	<b>3175</b>	<b>2,793</b>	<b>2678</b>	<b>-4%</b>

#### 4.3.6 Additional opportunity for adjustment

It is acknowledged that alternative options for adjustment are possible. For example, one could apply an elasticity were the WTP declines as the amount of natural capital per head of population in a country increases. It would clearly be illogical for a country with a small population within an enormous area to value each hectare at the same level as for a country with a very large population contained within a very small area.

The Natura 2000 network is clearly artificial in its limits. Consideration therefore needs to go also to other ecosystems. One option for sensitivity analysis could be to value areas outside the network at 50% less than Natura 2000 areas.

## 5 Repair cost approach

### 5.1 Methods and data

This approach is based on the position that policy inaction (a failure to reduce emissions) would increase restoration costs. This analysis multiplies the restoration cost/damage estimates generated by Ott et al by emissions in each country (see Table 4 above, and Figure 8 and Figure 9). For the purpose of illustration, it is assumed that emission = deposition (what goes up must come down: though an obvious refinement would be to use average deposition rates at the national level to derive an estimate of damage occurring in each country, rather than damage caused by each country). It is also assumed that the correct emission estimate to use with the Ott damage estimates is the mass of NO<sub>x</sub> and NH<sub>3</sub> emitted, rather than the mass emission of nitrogen per se.

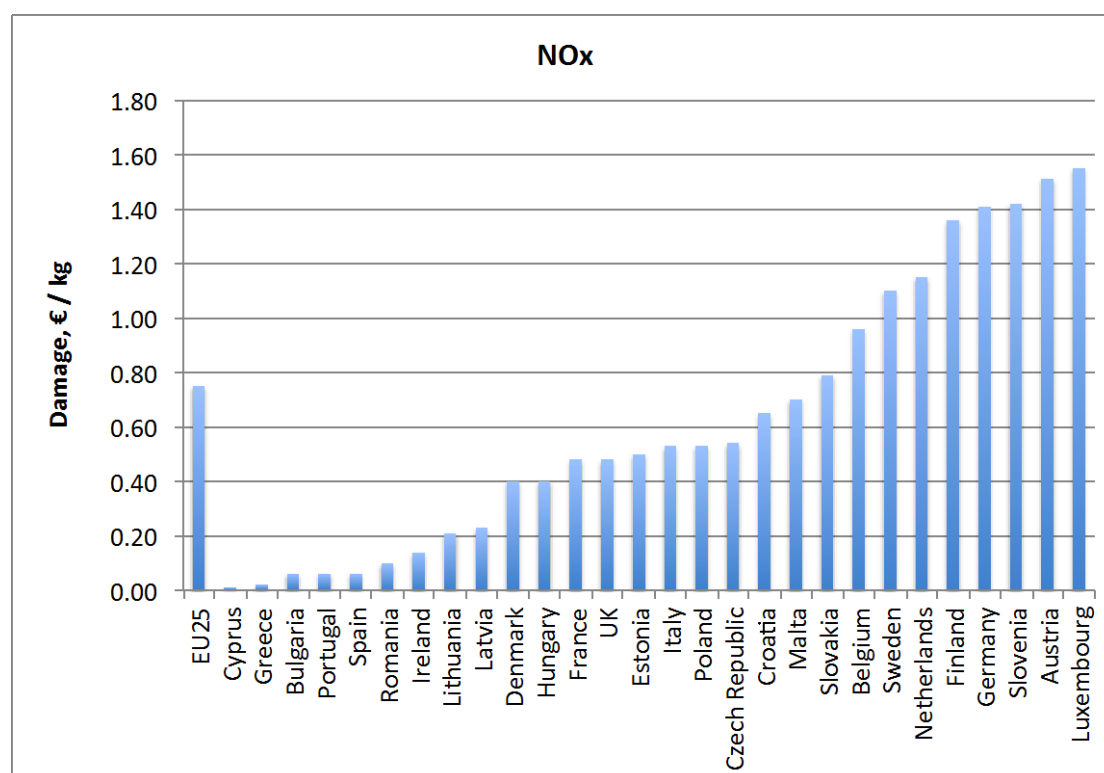
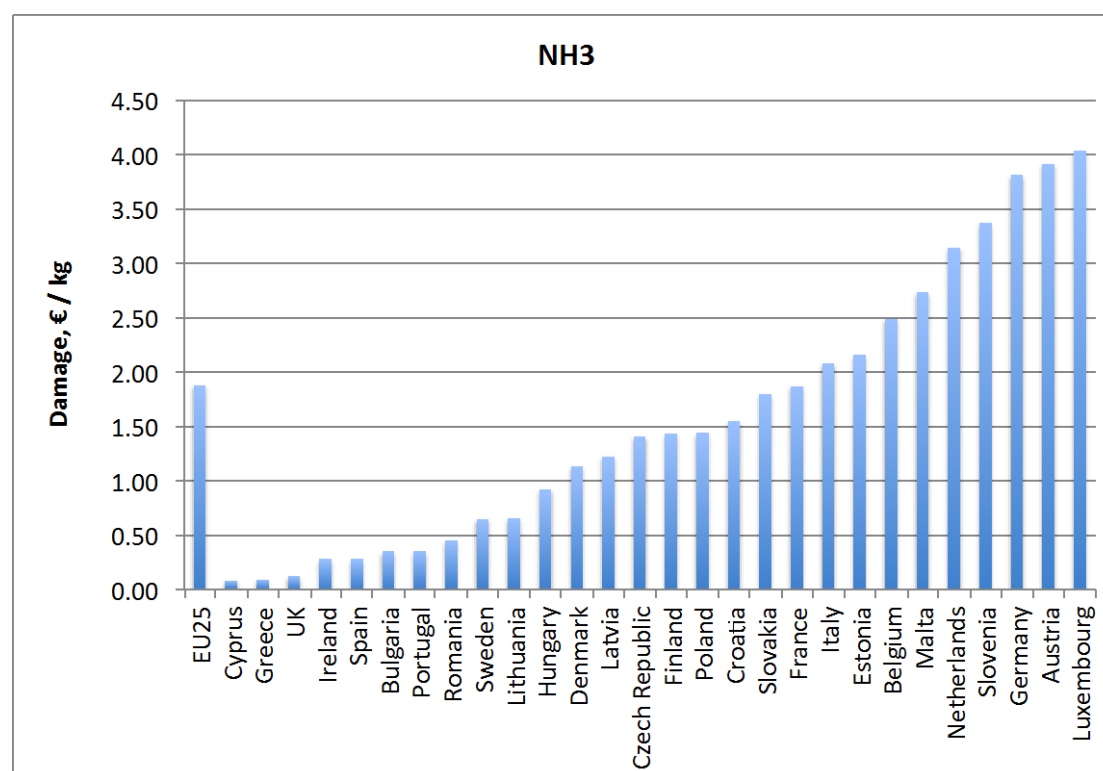


Figure 8. Ranked externality estimates for NO<sub>x</sub> (data source: Ott et al, 2006).





**Figure 9. Ranked externality estimates for NH<sub>3</sub> (data source: Ott et al, 2006).**

## 5.2 Results: Estimated damage caused by each country

Results are shown for NO<sub>x</sub> (Table 16), NH<sub>3</sub> (Table 17) and NO<sub>x</sub> and NH<sub>3</sub> combined (Table 18). Roughly twice as much damage is linked to NH<sub>3</sub> as NO<sub>x</sub><sup>11</sup>, with benefits (the difference between scenarios) three times higher for NH<sub>3</sub>. Total damage for the two pollutants combined at the EU28 level is of the order of €9 billion/year under current legislation (CLE) in both 2025 and 2030, falling to €6 billion/year under MTRF, with benefits of €2.7 billion/year, these being dominated by NH<sub>3</sub>.

As noted above, there are a number of uncertainties involved in the application of the results of Ott et al. These include:

- The results from Ott et al were calculated for a 2004 scenario, since when emissions have fallen.
- There is an assumption that for the purposes of this analysis, deposition is equivalent to emission.
- It is assumed that the damage costs are assessed against mass emission of NH<sub>3</sub> and NO<sub>x</sub>, rather than emission of N alone.

<sup>11</sup> The difference would be substantially greater if it was assumed that the Ott et al results should be applied per unit of nitrogen rather than NO<sub>x</sub> and NH<sub>3</sub>.

Against these caveats it is of course to be remembered that the analysis is performed to test different methods and to see whether they provide consistent answers.

**Table 16. Estimated damage to ecosystems under the CLE and MTFR scenarios for 2025 and 2030 for NO<sub>x</sub>, and benefits of applying MTFR.**

	NO <sub>x</sub> cost, M€/kt	CLE damage, €M	MTFR damage, €M	Benefit, €M		CLE damage, €M	MTFR damage, €M	Benefit, €M
		2025	2025	2025		2030	2030	2030
Austria	1.51	116	98	18		99	82	17
Belgium	0.96	140	106	34		129	91	38
Bulgaria	0.06	4	3	1		4	2	1
Croatia	0.65	23	11	13		22	9	12
Cyprus	0.01	0	0	0		0	0	0
Czech Republic	0.54	70	53	17		60	45	16
Denmark	0.4	28	22	6		25	18	6
Estonia	0.5	9	6	3		8	5	3
Finland	1.36	150	126	25		135	111	24
France	0.48	241	189	52		212	159	53
Germany	1.41	857	648	209		748	536	211
Greece	0.02	3	2	1		3	2	1
Hungary	0.4	24	17	7		21	14	7
Ireland	0.14	9	7	2		6	4	2
Italy	0.53	272	221	51		242	191	51
Latvia	0.23	5	4	1		5	3	1
Lithuania	0.21	6	5	1		6	5	1
Luxembourg	1.55	20	19	1		16	14	1
Malta	0.7	1	1	0		1	1	0
Netherlands	1.15	182	137	44		165	120	44
Poland	0.53	232	182	50		201	148	52
Portugal	0.06	6	4	2		6	3	2
Romania	0.1	14	9	5		13	8	5
Slovakia	0.79	39	28	12		37	25	12
Slovenia	1.42	26	22	4		22	17	5
Spain	0.06	30	22	8		26	18	8
Sweden	1.1	91	79	12		83	70	13
United Kingdom	0.48	242	183	59		212	152	60
EU28		2,841	2,204	638		2,502	1,855	646

**Table 17. Estimated damage to ecosystems under the CLE and MTR scenarios for 2025 and 2030 for NH<sub>3</sub>, and benefits of applying MTR.**

	NH <sub>3</sub> cost, M€/kt	CLE damage, €M	MTR damage, €M	Benefit, €M		CLE damage, €M	MTR damage, €M	Benefit, €M
		2025	2025	2025		2030	2030	2030
Austria	3.91	263	181	82		265	183	83
Belgium	2.49	185	150	34		183	150	33
Bulgaria	0.35	22	20	3		23	20	3
Croatia	1.55	45	28	17		46	29	17
Cyprus	0.08	0	0	0		0	0	0
Czech Republic	1.41	89	73	17		88	72	16
Denmark	1.13	57	44	13		57	44	13
Estonia	2.16	27	18	9		28	18	10
Finland	1.43	45	35	10		45	35	10
France	1.87	1,193	795	398		1,195	794	401
Germany	3.81	2,173	1,139	1,034		2,152	1,119	1,034
Greece	0.09	4	3	1		4	3	1
Hungary	0.92	62	44	18		62	45	18
Ireland	0.28	28	24	4		28	24	4
Italy	2.08	802	615	187		810	623	187
Latvia	1.22	18	15	3		19	15	3
Lithuania	0.66	33	21	12		33	21	12
Luxembourg	4.03	22	18	4		22	18	4
Malta	2.73	4	3	1		4	3	1
Netherlands	3.14	351	346	6		347	342	5
Poland	1.44	477	327	149		479	329	150
Portugal	0.35	25	17	8		25	18	8
Romania	0.45	64	50	13		64	50	13
Slovakia	1.8	43	30	13		43	30	13
Slovenia	3.37	56	46	10		56	46	10
Spain	0.28	98	59	39		98	59	39
Sweden	0.65	31	25	6		32	26	6
United Kingdom	0.12	34	28	6		34	29	6
EU28		6,254	4,157	2,097		6,243	4,143	2,100

**Table 18. Estimated damage to ecosystems under the CLE and MTR scenarios for 2025 and 2030 for NO<sub>x</sub> and NH<sub>3</sub> combined, and benefits of applying MTR.**

	NH <sub>3</sub> cost, M€/kt	CLE damage, €M	MTR damage, €M	Benefit, €M		CLE damage, €M	MTR damage, €M	Benefit, €M
		2025	2025	2025		2030	2030	2030
Austria	3.91	378	279	99		364	265	99
Belgium	2.49	325	257	69		312	241	71
Bulgaria	0.35	26	23	4		26	22	4
Croatia	1.55	69	39	30		68	38	30
Cyprus	0.08	1	0	0		1	0	0
Czech Republic	1.41	159	126	34		148	117	31
Denmark	1.13	85	66	19		82	62	19
Estonia	2.16	36	24	12		36	23	12
Finland	1.43	195	160	35		180	146	34
France	1.87	1,434	984	451		1,406	953	453
Germany	3.81	3,030	1,787	1,243		2,900	1,655	1,245
Greece	0.09	7	6	2		7	5	2
Hungary	0.92	86	61	24		83	59	24
Ireland	0.28	37	31	6		34	28	6
Italy	2.08	1,075	837	238		1,052	813	238
Latvia	1.22	24	19	4		23	19	5
Lithuania	0.66	39	26	13		39	26	13
Luxembourg	4.03	42	37	5		38	33	5
Malta	2.73	5	4	1		5	4	1
Netherlands	3.14	533	483	50		512	462	50
Poland	1.44	709	509	200		680	477	202
Portugal	0.35	31	21	10		31	21	10
Romania	0.45	78	60	18		76	58	18
Slovakia	1.8	82	57	25		80	54	25
Slovenia	3.37	82	68	14		78	64	14
Spain	0.28	128	81	47		124	77	47
Sweden	0.65	122	104	18		115	96	19
United Kingdom	0.12	276	211	65		246	180	66
EU28		9,096	6,361	2,735		8,745	5,999	2,746

## 6 Regulatory revealed preference approach

### 6.1 Methods and data

This method is based on the assumptions that the costs of the Birds and Habitats Directives provide a minimal societal valuation for the protection of the Natura 2000 network, and that policy makers implicitly factored in necessary air pollutant abatement costs when designing the legislation. The analysis brings together the following data:

- The extent of exceedance of the critical load for eutrophication in each country in Natura 2000 areas (terrestrial only)
- The costs of applying all technical NH<sub>3</sub> controls contained in the GAINS model
- The same for NO<sub>x</sub>
- In the event that the critical load is not met, the cost of further measures.

Analysis is performed for both 2025 and 2030 using data generated by IIASA during the development of the Clean Air Policy Package. The baseline for costs is taken as the Current Legislation (CLE) scenario with the upper bound (so far as the analysis using the GAINS outputs is concerned), the Maximum Technically Feasible Reduction (MTFR) scenario.

A lack of consistency has been detected between the IIASA figures on the area of Natura 2000 sites in each country and the data of the Natura 2000 barometer published by the European Commission<sup>12</sup>. To some extent this may be a result of new Natura 2000 areas being declared recently that have yet to be included in the IIASA dataset. However, this does not fully explain the observed discrepancies as for some countries the IIASA data suggest a larger area of Natura 2000 sites than the barometer. Further discussion is needed to understand the differences that have been observed. For the purpose of this report these discrepancies have been ignored in order to demonstrate the analysis.

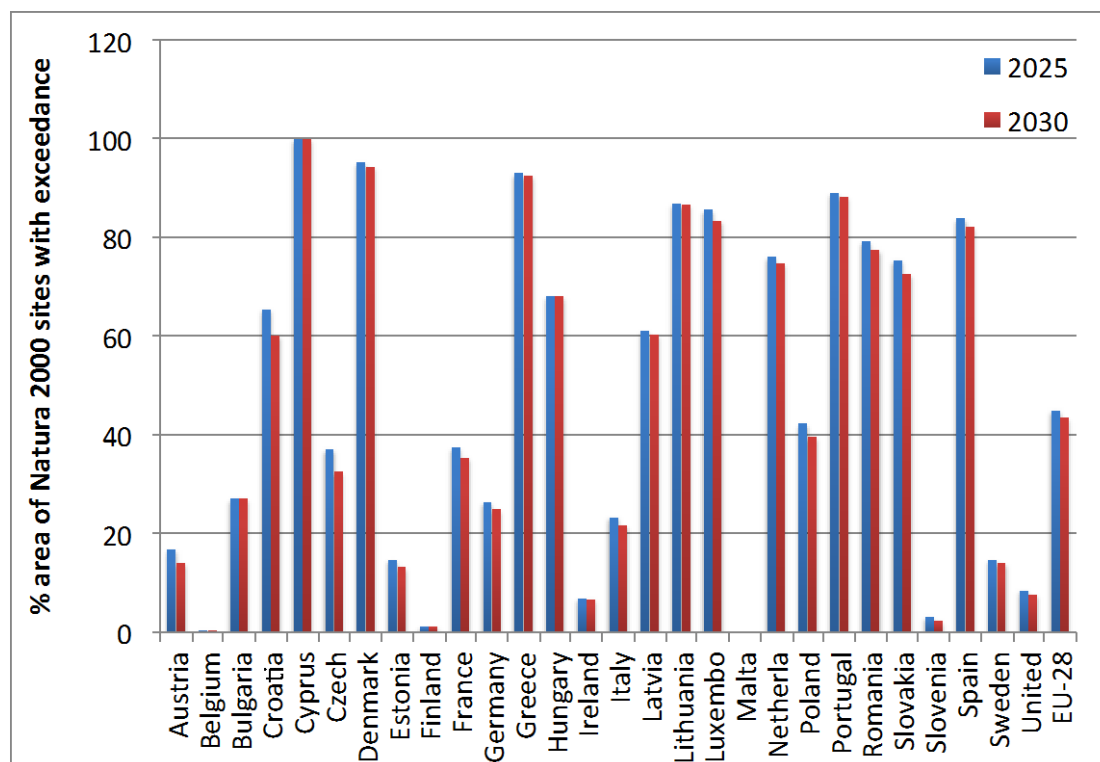
### 6.2 Results

Data on the geographic extent of the exceedance of the critical load for eutrophication in Natura 2000 areas is presented in Figure 10. This shows some exceedance in all countries except Malta, for which no data were provided. The IIASA data provided no information for 5 of the countries for which figures are presented: Austria, Belgium, Bulgaria, Poland and the UK. However, whilst no information was available for these countries with respect to the Natura 2000

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<sup>12</sup> [http://ec.europa.eu/environment/nature/natura2000/barometer/index\\_en.htm](http://ec.europa.eu/environment/nature/natura2000/barometer/index_en.htm)

sites, it was available for exceedance across all terrestrial ecosystems. For the purposes of the figure it is assumed that for the countries omitted by IIASA there are proportionally similar levels of exceedance in Natura 2000 sites and all ecosystems. This assumption is largely ratified by inspection of data for countries for which both sets of results were available.



**Figure 10. % area of terrestrial Natura 2000 sites with exceedance of the critical load for eutrophication in 2025 and 2030 under the MTR scenario.**

There are some possible discrepancies in the results shown in Figure 10, with large differences in levels of exceedance between neighbouring countries. For example, in Belgium there is almost no exceedance, whilst in the Netherlands there is exceedance across more than 70% of the Natura 2000 area. This has further consequences, discussed at the end of this section.

Data on costs of moving from current legislation are shown in Table 19 and Table 20. The much higher costs under CLE for NO<sub>x</sub> compared to NH<sub>3</sub> are a function of higher levels of existing controls. The costs of moving from CLE to MTR for ammonia are nearly identical for both years, around €4 billion/year. However, the costs of moving to MTR for NO<sub>x</sub> are higher for 2030 than 2025 (€6.6 billion against €5.2 billion/year). Total costs for the two pollutants for this shift are in the region of €10 billion for each year.

**Table 19. Costs of moving from the Current Legislation scenario to the Maximum Technically Feasible Reduction (MTFR) scenario in 2025. Data source: IIASA, units €million/year.**

	CLE	MTFR	CLE	MTFR	Change	Change	Total cost
	NO <sub>x</sub> , 2025	NO <sub>x</sub> , 2025	NH <sub>3</sub> , 2025	NH <sub>3</sub> , 2025	NO <sub>x</sub> 2025	NH <sub>3</sub> 2025	NO <sub>x</sub> + NH <sub>3</sub>
Austria	1,272	1,415	15	111	143	96	239
Belgium	1,292	1,454	79	204	162	125	287
Bulgaria	731	804	8	43	73	35	108
Croatia	223	304	-	45	81	45	126
Cyprus	99	110	5	15	11	10	21
Czech Rep.	988	1,130	28	62	142	34	176
Denmark	570	635	178	248	65	71	136
Estonia	120	140	3	19	20	16	36
Finland	727	844	16	64	117	49	166
France	6,262	7,042	98	737	780	639	1,419
Germany	7,716	8,232	158	1,158	516	1,000	1,515
Greece	1,558	1,699	5	34	142	28	170
Hungary	679	782	21	75	102	53	156
Ireland	689	745	30	75	56	45	100
Italy	6,726	7,189	131	419	463	287	750
Latvia	259	286	3	17	27	14	41
Lithuania	274	312	7	100	37	93	130
Luxembourg	107	113	-	4	6	4	10
Malta	93	96	-	2	2	2	4
Netherlands	2,136	2,325	398	411	190	12	202
Poland	6,244	6,784	90	506	540	416	956
Portugal	986	1,081	13	86	96	73	168
Romania	1,303	1,483	24	132	180	108	288
Slovakia	528	596	6	30	68	24	92
Slovenia	273	293	5	16	20	11	30
Spain	4,995	5,507	306	828	511	522	1,033
Sweden	836	890	14	65	54	50	104
UK	5,358	5,990	67	201	632	135	767
<b>EU-28</b>	<b>53,046</b>	<b>58,282</b>	<b>1,708</b>	<b>5,703</b>	<b>5,236</b>	<b>3,995</b>	<b>9,231</b>

**Table 20. Costs of moving from the Current Legislation scenario to the Maximum Technically Feasible Reduction (MTFR) scenario in 2030. Data source: IIASA, units €million/year.**

	CLE	MTFR	CLE	MTFR	Change	Change	Total cost
	NO <sub>x</sub> , 2025	NO <sub>x</sub> , 2025	NH <sub>3</sub> , 2025	NH <sub>3</sub> , 2025	NO <sub>x</sub> 2025	NH <sub>3</sub> 2025	NO <sub>x</sub> + NH <sub>3</sub>
Austria	1,383	1,575	15	111	192	96	288
Belgium	1,428	1,592	77	199	164	122	286
Bulgaria	743	835	8	44	91	35	127
Croatia	239	322	-	46	82	46	128
Cyprus	114	126	5	16	12	10	23
Czech Rep.	1,086	1,239	28	62	153	33	187
Denmark	615	702	177	247	87	70	157
Estonia	131	151	3	20	20	17	37
Finland	781	910	16	64	129	49	177
France	6,843	7,688	99	739	845	641	1,485
Germany	7,747	8,276	158	1,150	528	992	1,520
Greece	1,672	1,890	5	34	217	29	246
Hungary	754	861	22	75	108	54	161
Ireland	852	922	31	76	70	45	114
Italy	7,326	7,872	132	423	546	290	836
Latvia	291	328	3	18	37	15	51
Lithuania	310	353	7	100	43	93	136
Luxembourg	114	120	-	4	6	4	11
Malta	99	101	-	2	2	2	4
Netherlands	5,330	6,037	388	401	707	12	719
Poland	6,662	7,391	95	520	729	426	1,155
Portugal	1,114	1,220	14	88	106	75	180
Romania	1,436	1,635	24	131	199	107	306
Slovakia	595	665	6	30	70	25	94
Slovenia	295	321	5	16	25	11	36
Spain	5,844	6,465	311	837	621	526	1,146
Sweden	870	946	15	65	75	51	126
UK	5,597	6,335	67	203	738	136	875
<b>EU-28</b>	<b>60,275</b>	<b>66,877</b>	<b>1,710</b>	<b>5,720</b>	<b>6,602</b>	<b>4,010</b>	<b>10,612</b>



Figure 11 investigates the relationship between costs and the area subject to exceedance in each country. There is clearly some correlation between the two: big countries will tend to have larger areas of Natura 2000 sites and more polluting activity. However, there are several factors that weaken the relationship, for example relating to variation in the criteria for declaration of Natura 2000 sites at the national level, variability in ecosystems and their sensitivity to nitrogen and levels of economic activity per unit land area.

Considering the results of Figure 11, it is concluded that a relationship is present, but not very strong. An alternative approach is to allocate out the total EU cost of moving from CLE to MTFR according to the area of exceedance of Natura 2000 sites in each country under CLE. This approach is applied in Table 21 and Table 22. The consistency for each country between the results shown in these tables, and the results shown in Table 19 and Table 20 is considered in Figure 12. Results are very inconsistent, though this is not surprising given the presence of a significant number of countries with limited extent of exceedance of the critical load for eutrophication but abatement opportunity.

Next, it is necessary to consider whether adoption of the MTFR would be required for both pollutants. Emissions of NH<sub>3</sub> will in general be deposited closer to source than emissions of NO<sub>x</sub>, and hence action to protect Natura 2000 sites might focus on NH<sub>3</sub>. If that is the case, the NO<sub>x</sub> costs could be ignored, but more action on NH<sub>3</sub> would be needed. At a hypothetical extreme, one might consider closing down livestock production. The following calculations for the Netherlands give an indication of magnitudes:

- Value added of livestock farming = 40% of value added of agricultural sector
- Share of agricultural sector in total GDP in the Netherlands = 1.6%
- Total GDP in the Netherlands = €600bn
- Cost of closing livestock units in the Netherlands = €3.8bn

The Netherlands provides an extreme example, given the very extensive exceedance of the critical load for eutrophication in the country. However, this simple calculation suggests that, if widespread closure of livestock facilities were to be applied, costs would be very high for countries with significant levels of exceedance.

It is worth noting that, if a shift to the MTFR scenario were agreed in the interests of protecting ecosystems, the implied valuation of ecosystems would be between a factor 4 and 10 higher than the valuation implicitly accepted for health in the development of the Clean Air Policy Package.

There are several ways in which this analysis could be refined:

- Assess only for NH<sub>3</sub> if it is particularly dominant in generating critical loads exceedance.
- Include MTFR options only in countries where it is needed to meet critical loads, depending on transboundary considerations.

- Factor in uncertainty in critical load definition to exclude measures with excessive costs.
- Estimation of livestock reduction necessary after the above are taken into account.

Further consideration will be given to these potential refinements once response to the initial results has been addressed.

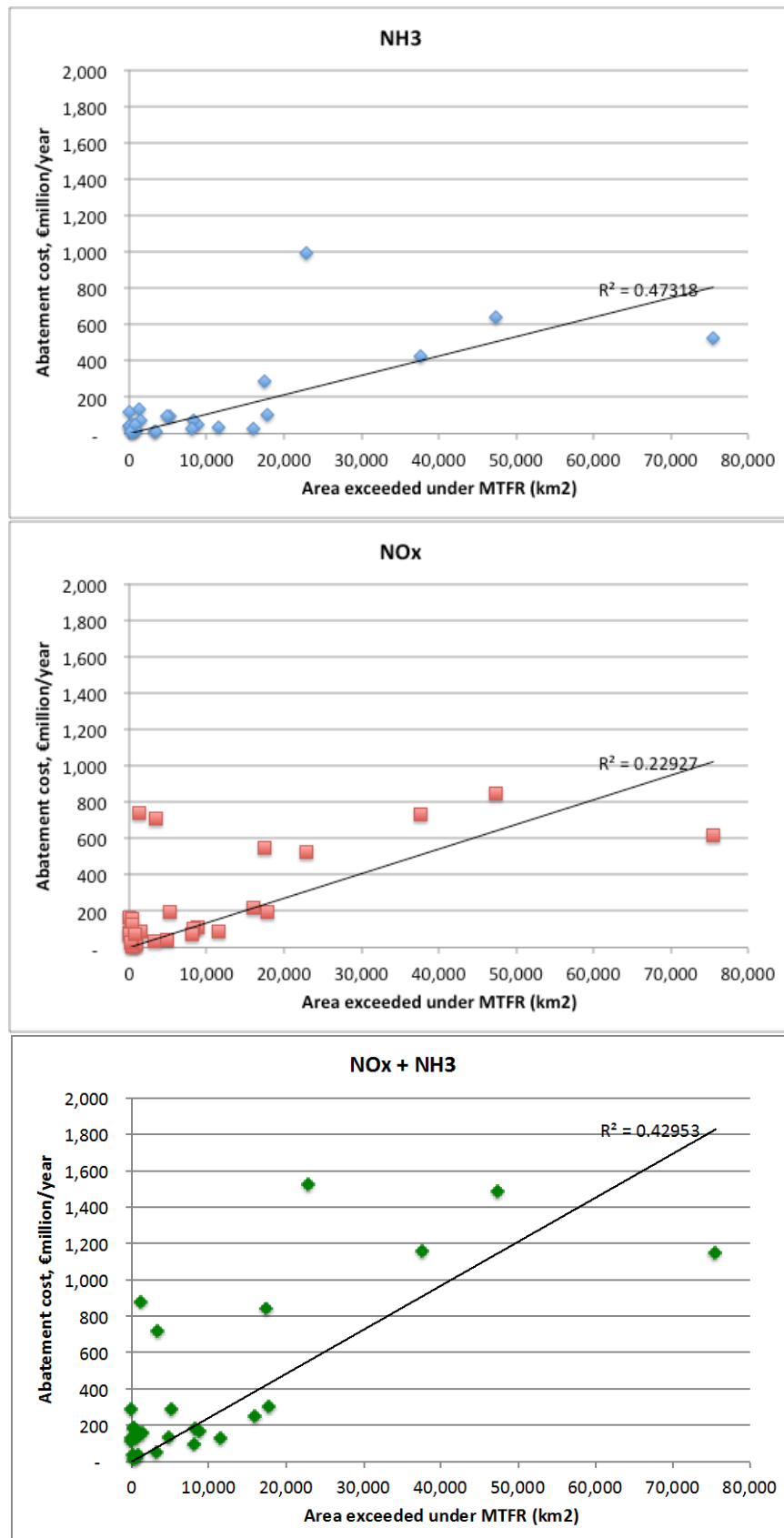


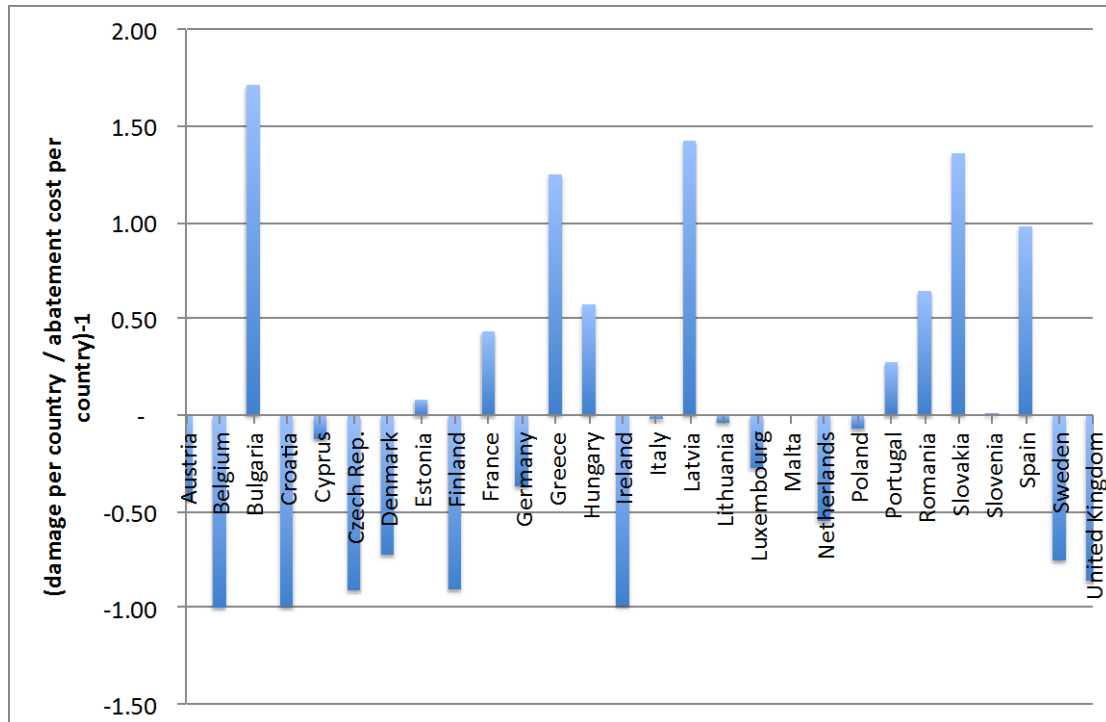
Figure 11. Relationship between MTRF abatement cost and Natura 2000 area exceeded in each country. Log scale on y-axis.

**Table 21. Benefit (million/year) to each country of reducing emissions from the CLE scenario in 2025. Shading highlights countries for which data on exceedance of critical loads in Natura 2000 sites was not provided by IIASA.**

2025	NOx	NH3	Nox+NH3
<i>Cost, € per km2</i>	<i>13193</i>	<i>10066</i>	<i>23259</i>
Austria	76	58	134
Belgium	0	0	0
Bulgaria	166	127	292
Croatia	0	0	1
Cyprus	10	8	18
Czech Rep.	9	7	16
Denmark	21	16	37
Estonia	22	17	39
Finland	9	7	16
France	1155	881	2036
Germany	543	414	957
Greece	217	166	383
Hungary	139	106	245
Ireland	1	0	1
Italy	416	317	733
Latvia	57	43	100
Lithuania	71	54	125
Luxembourg	4	3	7
Malta			
Netherlands	51	39	91
Poland	504	384	888
Portugal	122	93	215
Romania	268	205	473
Slovakia	123	94	217
Slovenia	17	13	31
Spain	1160	885	2045
Sweden	14	11	26
United Kingdom	60	46	106
EU-28	5236	3995	9231

**Table 22. Benefit (million/year) to each country of reducing emissions from the CLE scenario in 2030. Shading highlights countries for which data on exceedance of critical loads in Natura 2000 sites was not provided by IIASA.**

2030	NOx	NH3	Nox+NH3
<i>Cost, € per km2</i>	16953	10297	27249
Austria	91	55	147
Belgium	0	0	0
Bulgaria	213	129	343
Croatia	0	0	1
Cyprus	13	8	21
Czech Rep.	11	7	18
Denmark	27	16	44
Estonia	28	17	46
Finland	11	6	17
France	1438	873	2311
Germany	679	413	1092
Greece	278	169	447
Hungary	173	105	278
Ireland	1	0	1
Italy	514	312	826
Latvia	72	44	115
Lithuania	91	55	146
Luxembourg	5	3	9
Malta	0	0	0
Netherlands	66	40	106
Poland	638	387	1025
Portugal	156	95	251
Romania	343	208	551
Slovakia	156	95	251
Slovenia	20	12	32
Spain	1485	902	2387
Sweden	18	11	29
United Kingdom	75	45	120
EU-28	6602	4010	10612



**Figure 12. Test of consistency for abatement cost per country and damage cost per country based on overall EU28 abatement cost using data for 2025**

## 7 Crop and forest damage

### 7.1 General approach for crop impact assessment

In recent years, experts in assessment of crop damage have developed a strong preference for quantification using a measure of dose (referred to as  $POD_y$ , the phytotoxic ozone dose in excess of some threshold  $y$ ) rather than a measure of concentration (generally expressed as 'AOT40', the accumulated exposure to ozone in excess of 40 ppb over the growing season). The dose metric is preferred as high-ozone conditions with high temperatures may lead to low ozone uptake given limited water availability. Unfortunately, POD relationships are available for very few crops – wheat, tomato and potato at the present time. In order to gain an understanding of the overall effect on crop production it is therefore necessary to make some judgement of the relative sensitivity of a large number of crops compared to those for which POD data are available. This is explored below.

Climate change will cause farmers to switch to different crops that can withstand altered conditions with respect to rainfall, temperature, etc. This is not taken into account below but is being considered by the University of Aarhus.

Analysis is not presented for forest damage, though the methods used are the same, basing production data on FAO statistics and using dose based response functions.

### 7.2 Methods for crop impact assessment

Analysis proceeds through the following steps:

Step 1: Obtain crop production data as economic value of production

Step 2: Convert production data from international \$ to euro

Step 3: Define response functions

Step 4: Define geographic resolution

Step 5: Obtain ozone data

Step 6: Apply response functions and calculate impacts

Each step is described below.

#### **Step 1: Obtain crop production data**

European crop production data for 2010 was extracted from the UN Food and Agriculture Organization (FAO) as gross production, 000 \$int<sup>13</sup>. The response functions indicate a linear relationship between the selected metric of ozone exposure and yield. Assuming that the value of yield loss over the range of possible changes in ozone exposure is also linear, it is possible to use the change in economic production directly. If it is assumed that the value of crops does not vary in a linear fashion with yield over

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<sup>13</sup> <http://faostat3.fao.org/download/Q/QV/E>.

the range of interest it may be necessary to go first through a calculation of the change in yield and then to valuation, but this would be a simple addition to the analysis.

### Step 2: Convert production data to euro

Int\$ 2004-6 are converted to 2005 € using a conversion factor of 0.8912. Note: all cost data in the GAINS and ALPHA-Riskpoll Cost-Benefit Assessment models are expressed in price year 2005.

### Step 3: Define response functions

Response functions identified for each crop type:

For wheat, relative yield =  $1 - \text{POD3IAM} * 0.0064$  (ICP M&M, 2014)

POD relationships are also available for tomato and potato, but only against the POD6 metric, which differs to POD3IAM with respect to both threshold and the period over which ozone data are assessed (55 days vs 90 days). We take the following functions expressed against POD6 and then pro-rate against the what POD3IAM function:

For wheat, relative yield =  $1 - \text{POD6} * 0.038$  (ICP M&M, 2014)

For potato, relative yield =  $1 - \text{POD6} * 0.013$  (ICP M&M, 2014)  
 $= 1 - \text{POD3IAM} * (0.0064 * 0.013/0.038)$   
 $= 1 - \text{POD3IAM} * 0.0022$

For tomato, relative yield =  $1 - \text{POD6} * 0.0266$  (Gonzalez-Fernandez et al)  
 $= 1 - \text{POD3IAM} * (0.0064 * 0.0266/0.038)$   
 $= 1 - \text{POD3IAM} * 0.0045$

For a number of other crops information on sensitivity is taken from table 1 (their numbering) of ICP Vegetation (2011):

**Table 1** Grouping of crops by sensitivity of yield to ozone. Values in brackets represent the percentage decrease in yield at a 7h mean ozone concentration of 60 ppb compared to that at 30 ppb.

Sensitive	Moderately sensitive	Tolerant
Peas and beans (including peanut) (30)	Alfalfa (14)	Strawberry (1)
Sweet potato (28)	Water melon (14)	Oat (-3)
Orange (27)	Tomato (13)	Broccoli (-5)
Onion (23)	Olive (13)	
Turnip (22)	Field mustard (12)	
Plum (22)	Sugar beet (11)	
Lettuce (19)	Oilseed rape (11)	
Wheat (18)	Maize (10)	
Soybean (18)	Rice (9)	
	Potato (9)	
	Barley (6)	
	Grape (5)	

For these crops (excluding wheat, potato and tomato, as POD3IAM functions are derived as above), functions are derived relative to POD3IAM by scaling against wheat yield loss. Hence peas and beans are taken to be 30/18 times as sensitive as wheat, and grape 5/18 times as sensitive. It is considered unlikely that ozone is beneficial to oat or broccoli, so for these crops the response function is set to zero.



For other crops some extrapolation is applied where possible. So, for example, simple cereals such as rye are regarded like oat as being tolerant, and legumes generally are regarded like peas and beans as being highly sensitive.

Other crops not covered by the functions derived so far are taken to have similar sensitivity to grape, the least sensitive of the crops in the 'moderately sensitive' class of the table above. The logic for adopting the function for the least sensitive of the 'moderately sensitive' crops is that experimentation tends to focus on species and cultivars for which a significant response has been observed at some time. A lack of data for a crop might therefore suggest that it is unlikely to be highly sensitive, and hence that it is either tolerant or moderately sensitive. The sensitivity of grape is thus taken as indicative of the break point between the two sensitivity classes.

For sensitivity analysis a low variant has been adopted. Wheat, tomato and potato functions are as above. Crops identified as 'sensitive' are given the same sensitivity as wheat, the least sensitive of the 'sensitive' species in Table 1. Tolerant crops are given a DRF of 0. All other crops are given the same sensitivity as grape, the least sensitive of the 'moderately sensitive' crops in the above table.

#### **Step 4: Define geographic resolution**

The ozone data provided for scenario analysis in policy development for the European Commission are provided at national level only, though represent a receptor-weighted average for each country. The geographic resolution adopted here is thus the national scale.

#### **Step 5: Obtain ozone exposure data.**

The following data (see table 2 on next page) were taken from earlier GAINS model runs, carried out in the context of the Clean Air Policy Package issued by the European Commission in December 2013.

Key to the table:

TSAP = Thematic Strategy on Air Pollution

CLE = Current legislation

CLE-OPT = cost optimised version of future CLE scenarios

MTFR = Maximum Technically Feasible Reduction (based on measures included in the GAINS database).

For the purpose of illustration here, the data for 2010 are used to quantify yield under zero ozone (given that the FAO production statistics are also for 2010), and data for 2020 are adopted for analysis as results can be compared directly with those presented for the same year in the 2011 ICP Vegetation report. This is done below. Further analysis assesses the 2030 MTFR (Maximum Technically Feasible Reduction scenario) as an indication of the likely extent of future change in POD3IAM ozone exposure. For the purposes of ECLAIRE we will need to consider scenarios going further into the future, to 2050, but 2030 MTFR provides a useful indication of likely changes.

**Table 23. Phytotoxic ozone dose (mmol/m<sup>2</sup>) above a threshold of 3 nmol/m<sup>2</sup>/s - generic crop. Source: GAINS (POD3IAM)**

Country	TSAP-2013 CLE	TSAP-2013 CLE	TSAP-2013 CLE	TSAP-2013 CLE_OPT	TSAP-2013 CLE_OPT	TSAP-2013 MTFR	TSAP-2013 MTFR
	2010	2015	2020	2025	2030	2025	2030
Albania	12.43	11.78	11.09	10.77	10.67	10.31	10.22
Austria	18.32	16.94	15.47	14.65	14.26	13.6	13.21
Belarus	17.16	16.42	15.74	15.37	15.26	14.91	14.81
Belgium	17.93	17.15	16.32	15.81	15.6	14.89	14.68
Bosnia and Herzegovina	13.65	12.74	11.56	11.16	10.99	10.45	10.28
Bulgaria	17.87	16.4	15.39	14.93	14.61	14.07	13.77
Croatia	18.97	17.64	16.13	15.43	15.11	14.33	14
Cyprus	13.41	13.07	12.62	12.49	12.63	12.16	12.3
Czech Republic	18.36	17.07	15.78	15.05	14.68	14	13.64
Denmark	16.19	15.55	14.62	14.16	13.93	13.54	13.33
Estonia	15.98	15.27	14.52	14.12	13.91	13.6	13.42
Finland	12.36	11.74	11.12	10.79	10.63	10.41	10.26
France	17.42	16.41	15.23	14.59	14.29	13.8	13.52
TFYR Macedonia	12.65	11.79	10.83	10.42	10.22	9.98	9.78
Germany	18.02	16.96	15.8	15.13	14.83	14.24	13.95
Greece	16.36	15.44	14.58	14.07	13.85	13.43	13.24
Hungary	19.9	18.51	17.1	16.42	16.09	15.32	14.99
Ireland	7.93	7.75	7.37	7.09	6.92	6.77	6.59
Italy	20.7	19.24	17.84	17.04	16.69	15.88	15.53
Latvia	16.41	15.67	14.9	14.46	14.27	13.94	13.75
Lithuania	17.26	16.39	15.55	15.08	14.87	14.48	14.28
Luxembourg	17.55	16.53	15.39	14.75	14.46	13.9	13.61
Malta	21.4	20.42	19.41	18.84	18.6	17.9	17.68
Montenegro	15.65	14.6	13.4	12.96	12.74	12.29	12.08
Netherlands	17.54	16.88	16.13	15.67	15.47	14.8	14.62
Norway	8.31	7.99	7.53	7.28	7.16	7.05	6.94
Poland	18.54	17.41	16.28	15.68	15.39	14.79	14.5
Portugal	14.58	14.14	13.57	13.26	13.09	12.69	12.51
Republic of Moldova	16.61	15.88	15.14	14.84	14.8	14.34	14.3
Romania	17.47	16.4	15.42	14.94	14.73	14.05	13.84
Russian Federation	13.05	12.55	12.15	11.9	11.87	11.73	11.71
Serbia	15.65	14.6	13.4	12.96	12.74	12.29	12.08
Slovakia	18.54	17.26	15.95	15.29	14.97	14.19	13.86
Slovenia	18.73	17.31	15.68	14.83	14.42	13.7	13.29
Spain	11.83	11.5	10.89	10.56	10.39	10.05	9.87
Sweden	13.41	12.82	12.04	11.66	11.49	11.22	11.05
Switzerland	11.58	10.75	9.68	9.09	8.81	8.57	8.3
Ukraine	16.2	15.55	14.9	14.63	14.62	14.25	14.25
United Kingdom	12.62	12.2	11.52	11.16	10.98	10.55	10.39

**Step 6: Application of the response functions.**

Existing production data are of course depressed as a result of exposure to current levels of ozone. A first stage is therefore to quantify a counter-factual level of production, assuming that ozone levels (here, as  $POD3IAM$ ) = 0. This is calculated for each country using the following expression, where DRF = dose response function:

$$Yield\ at\ zero\ ozone = \frac{2010\ yield}{1 - [POD3IAM \times DRF]}$$

Hence if ambient ozone in 2010 reduced yield of a crop by 20% (the product of  $POD3IAM$  and DRF), the yield at zero ozone would have been 25% higher than reported production.

Assuming that crop production patterns remain unchanged, the impacts of ozone in future years can then be calculated as follows:

$$Impact_y = 2010\_production * POD3IAM_y * DRF$$

Where the subscript  $y$  refers to the target year for quantification.

**7.3 Results for crops**

Results are shown in Table 24 for each of the crops considered, and Table 25 disaggregated to country. Two of the above series of scenarios are considered, describing impacts in 2010 and forecast effects in 2030 under the Maximum Technically Feasible Reduction Scenario (MTFR), these providing the extremes of the scenarios for which data were available. Overall, the reduction in ozone levels over this period leads to a reduction in annual damage of €1.98 billion.

Results for the EU27 (EU excluding Cyprus) with Norway and Switzerland are shown in Table 26<sup>14</sup>. These results account for 79% of the total for the longer list of European countries. The crop for which the largest damage is estimated is wheat, at over 30% of the total: no other crop provides more than 10% of the total damage. This dominance of wheat is to be expected given that wheat is widely grown and sensitive. The total damage from crops for which POD functions are available (wheat, potato and tomato) is 40%.

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<sup>14</sup> This grouping of countries was selected for comparison against results from ICP Vegetation (2011).

**Table 24. Crop loss by crop in 2010 and 2030 under the MTR scenario.**

All countries	2010 total production at ambient ozone	2010 total production at zero ozone	Best estimate 2010 crop loss	Best estimate 2030 MTR crop loss
Wheat	28,344	31,594	3,250	2,635
Potatoes	16,198	16,784	586	487
Grapes	13,643	14,064	421	330
Maize	10,721	11,424	702	555
Olives	9,119	9,793	674	539
Barley	7,787	8,056	268	218
Tomatoes	7,151	7,659	508	409
Rapeseed	5,776	6,187	411	325
Sugar beet	5,766	6,163	397	320
Apples	5,329	5,497	169	133
Sunflower seed	4,901	5,042	141	119
Mushrooms and truffles	2,774	2,774	-	-
Peaches and nectarines	2,063	2,126	63	50
Vegetables, fresh, other	1,859	1,915	56	45
Strawberries	1,761	1,771	10	8
Carrots and turnips	1,746	1,995	249	204
Onions, dry	1,623	1,863	240	198
Triticale	1,522	1,571	49	39
Plums and sloes	1,456	1,672	215	171
Cabbages and other brassicas	1,426	1,468	41	34
Lettuce and chicory	1,290	1,451	161	127
Oats	1,213	1,213	-	-
Chillies and peppers, green	1,205	1,239	34	27
Soybeans	1,171	1,306	135	112
Oranges	1,141	1,347	206	163
Rice, paddy	1,072	1,130	58	47
Pears	1,050	1,082	33	26
Rye	1,028	1,028	-	-
Almonds, with shell	983	1,010	27	21
Cucumbers and gherkins	938	964	26	22
Cherries	852	878	26	21
Leeks, other alliaceous vegetables	719	742	22	18
Tangerines, mandarins, clementines, satsumas	714	733	19	15
Raspberries	685	704	19	16
Peas, dry	656	785	129	106
Watermelons	517	560	43	35
Currants	512	527	14	12
Cauliflowers and broccoli	499	499	-	-
Grain, mixed	495	495	-	-
Kiwi fruit	475	492	17	13
Peas, green	474	572	98	78
Other crops	10,125	10,798	673	536
<b>Total</b>	<b>158,780</b>	<b>168,972</b>	<b>10,192</b>	<b>8,214</b>

**Table 25. Crop loss by country in 2010 and 2030 under the MTR scenario.**

All crops	2010 total production at ambient ozone	2010 total production at zero ozone	Best estimate 2010 crop loss	Low estimate 2030 crop loss
Albania	598	625	27	22
Austria	1,615	1,723	107	78
Belarus	3,222	3,405	183	158
Belgium	2,324	2,464	140	115
Bosnia and Herzegovina	567	597	30	22
Bulgaria	2,114	2,262	148	114
Croatia	845	909	64	47
Czech Republic	1,581	1,719	138	102
Denmark	1,682	1,810	128	105
Estonia	162	173	11	9
Faroe Islands	0	0	-	-
Finland	582	605	23	19
France	19,220	20,715	1,495	1,160
Germany	11,762	12,657	895	693
Greece	4,930	5,242	312	252
Hungary	2,963	3,198	235	177
Iceland	4	4	-	-
Ireland	463	474	11	9
Italy	18,757	20,127	1,370	1,028
Latvia	361	388	27	23
Liechtenstein	0	0	-	-
Lithuania	663	716	54	44
Luxembourg	37	40	3	2
Malta	31	33	2	2
Montenegro	96	101	5	4
Netherlands	3,391	3,588	197	164
Norway	248	254	6	5
Poland	8,845	9,391	546	427
Portugal	2,115	2,225	110	94
Republic of Moldova	1,027	1,086	60	52
Romania	5,401	5,788	387	307
Russian Federation	18,374	19,403	1,030	924
Serbia	2,894	3,085	191	147
Slovakia	633	686	53	39
Slovenia	243	257	14	10
Spain	19,319	20,186	867	724
Sweden	923	977	53	44
Switzerland	559	582	23	16
The former Yugoslav Republic of Macedonia	602	626	24	18
Ukraine	13,843	14,696	853	750
United Kingdom	5,786	6,157	371	306
<b>Total</b>	<b>158,780</b>	<b>168,972</b>	<b>10,192</b>	<b>8,214</b>

**Table 26. Crop loss by crop in 2010 and 2030 under the MTR scenario in the EU27 (excluding Cyprus) + Norway and Switzerland.**

EU27 (not Cyprus) + NO + CH	Best estimate 2010 crop loss	% of total for 2010	Best estimate 2030 MTR crop loss	% of total for 2030 MTR
Wheat	2,367	30.4%	1,853	30.3%
Potatoes	333	4.3%	264	4.3%
Grapes	392	5.0%	306	5.0%
Maize	513	6.6%	396	6.5%
Olives	670	8.6%	536	8.8%
Barley	201	2.6%	158	2.6%
Tomatoes	407	5.2%	321	5.2%
Rapeseed	369	4.7%	289	4.7%
Sugar beet	295	3.8%	230	3.8%
Apples	136	1.7%	105	1.7%
Sunflower seed	55	0.7%	43	0.7%
Mushrooms and truffles	-	0.0%	-	0.0%
Peaches and nectarines	61	0.8%	48	0.8%
Vegetables, fresh, other	40	0.5%	32	0.5%
Strawberries	8	0.1%	6	0.1%
Carrots and turnips	176	2.3%	140	2.3%
Onions, dry	165	2.1%	132	2.2%
Triticale	43	0.6%	34	0.6%
Plums and sloes	140	1.8%	109	1.8%
Cabbages and other brassicas	22	0.3%	17	0.3%
Lettuce and chicory	160	2.1%	125	2.0%
Oats	-	0.0%	-	0.0%
Chillies and peppers, green	27	0.3%	22	0.4%
Soybeans	42	0.5%	32	0.5%
Oranges	206	2.6%	162	2.7%
Rice, paddy	45	0.6%	35	0.6%
Pears	29	0.4%	23	0.4%
Rye	-	0.0%	-	0.0%
Almonds, with shell	27	0.3%	21	0.3%
Cucumbers and gherkins	14	0.2%	11	0.2%
Cherries	20	0.3%	15	0.3%
Leeks, other alliaceous vegetables	22	0.3%	17	0.3%
Tangerines, mandarins, clementines, satsumas	19	0.2%	15	0.2%
Raspberries	8	0.1%	7	0.1%
Peas, dry	75	1.0%	59	1.0%
Watermelons	24	0.3%	19	0.3%
Currants	8	0.1%	6	0.1%
Cauliflowers and broccoli	-	0.0%	-	0.0%
Grain, mixed	-	0.0%	-	0.0%
Kiwi fruit	17	0.2%	13	0.2%
Peas, green	90	1.2%	71	1.2%
Other crops	565	7.3%	444	7.3%
<b>Total</b>	<b>7,790</b>		<b>6,116</b>	

## 7.4 Forest damage

As noted above, the methods for assessment of forest damage are essentially the same as those for agricultural production, starting from the use of monetised data on production from FAO.

A complication for the analysis concerns the variety of products reported by FAO that are linked to forest production, from sawn timber to pulp to charcoal and firewood, and to papers of various types. We have no basis for assessing how a change in forest productivity will differentially affect the different types of forest product. The assumption will therefore be made that all products are affected equally. Sensitivity to this assumption will be tested.

## 7.5 Discussion

The results above can be compared against results from table 2 of ICP Vegetation (2011) for wheat and tomato (other crops were not included in the ICP assessment, as it was restricted to those for which POD functions were available):

**Table 2** Predicted impacts of ozone pollution on wheat and tomato yield and economic value, together with critical level exceedance in EU27+Switzerland+Norway in 2000 and 2020 under the current legislation scenario (NAT scenario). Analysis was conducted on a 50 x 50 km EMEP grid square using crop values in 2000 and an ozone stomatal flux-based risk assessment.

	Wheat		Tomato	
	2000	2020	2000	2020
Total production, million t	133.53		17.68	
Total economic value of wheat in 2000, billion Euro	15.87		6.85	
Mean % yield loss per grid square	13.7 <sup>1</sup>	9.07 <sup>1</sup>	9.4 <sup>2</sup>	5.7 <sup>2</sup>
Total production loss, million t	26.89	16.45	2.64	1.62
Total economic value loss, billion Euro	3.20	1.96	1.02	0.63
Percentage of EMEP grid squares exceeding critical level	84.8 <sup>1</sup>	82.2 <sup>1</sup>	77.8 <sup>2</sup>	51.3 <sup>2</sup>

<sup>1</sup>based on all grid squares with wheat production, <sup>2</sup> based on grid squares with > 1 tonne of production

Despite the inconsistency in the years of assessment, it is clear that results for wheat are in good disagreement (economic loss of €1.96 billion for 2020 according to ICP Vegetation, vs €2.4 to €1.85 billion estimated here for 2030 MTRF and 2010). The ICP Vegetation results for tomato are significantly higher, however, a loss of €630 million from ICP Vegetation compared to a range of €300 to 400 million estimated here. It is thought likely that this difference is a function of different assumptions on irrigation between the different POD estimates used. Ongoing discussions with CEH are investigating whether a correction can be introduced to the analysis.

Sensitivity to different assumptions on crop response was tested, for those crops for which POD functions were unavailable, and estimates were based on extrapolation. Sensitivity was small, in large part due to the dominance of the crops for which POD functions were available (together accounting for 40% of damage).

No account is taken of some interactions here. The interaction with climate through variation in crop distributions is being investigated with the University of Aarhus. No attempt will be made to account for interactions with insect pests, given the lack of recent literature in this field, though it is noted as a potentially significant omission.

The approach developed for forests is similar, based on use of POD functions and linked to FAO production data. It has not been tested here as it needs to be performed in conjunction with analysis of carbon sequestration, methods for which are still in development at the time of writing. Valuation of carbon sequestration is, however, straightforward, drawing on a uniform estimate of damage per tonne carbon sequestered, which will be based on the estimates adopted by EEA (2014).



## 8 Discussion

The methods defined here will be applied using data from the agreed ECLAIRE scenarios for the final report on this work package. As noted above, results will be provided for the key ecosystem services relating to appreciation of biodiversity, crop production, forest production and carbon sequestration.

The analysis of biodiversity impacts presented here provides some advance over previous work (which is retained, through the 'restoration cost' approach and the 'regulatory revealed preference' approach, though neither is considered as theoretically robust as the estimates based on willingness to pay. The main problem with the WTP estimates is that they are based on a very limited literature. An important feature of the selected literature is that the WTP estimates are directly concerned with realistic levels of improvement, linked to the biodiversity action planning process. We acknowledge a broader literature on the valuation of these ecosystem services, but the outputs of that work are not directly applicable to estimated changes in the pollution burden.

A limitation of the approach taken here for biodiversity is that it is annualised, an approach that works well for traded commodities such as crops, or for goods, like human health where the time between exposure and impact is limited. This is, however, less the case for impacts on biodiversity, where change may take many years to occur, and then take decades or centuries to pass, if it ever does. An accumulated estimate of damage over time may provide a different stimulus for action than an annual estimate.

A further issue for biodiversity concerns the transparency of outputs relative to the ecological changes that are occurring. Mapping exceedance, or providing an anthropocentric estimate of economic damage is useful, but does not communicate the types of change that are occurring. This is not a problem if change is well understood by those making the policy. However, this will not include all relevant decision makers, for example those outside government environment departments in finance ministries, for example.

The fact that the estimates of damage provided here are small relative to results for human health impacts does not mean that these results can simply be ignored. Damage is in the order of many billions of euro annually, and potential improvements of several billion euro annually are possible. A focus only on health provides a bias against maximising the benefits that can be accrued from more broadly targeted policies. Recognising damage more broadly should also widen the appeal of progressive air pollution policies, for example to those working in agriculture, who may presently regard air pollution policy as more threat than opportunity.

Further refinement of methods will be reported in the final report on this work package, for example in relation to impacts of climate change on crop production and how it interacts with ozone damage.

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