# Policy Brief - Recommendations for Increasing the Acceptability of the Implementation of Paris' Low Emission Zone (LEZ)

**Directed to:** the Vice President of the Greater Paris Metropolitan Area for Ecological Transition, Air Quality, and Energy Network Development

Low Emission Zones (LEZ) are effective in reducing air pollution, as shown by multiple impact evaluations. However, in the Métropole du Grand Paris, the policy faces low public support and limited awareness. This policy brief argues that while the LEZ should be maintained, it must be adapted to increase its acceptability. Based on research and case studies, it proposes recommendations to improve communication, reframe the narrative, promote alternatives to car use and redesign financial aids, while involving citizens in shaping the policy.

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# Part 1: Understanding the Low-Emission Zone Framework

LEZs are designed to improve urban air quality by encouraging car fleet renewal and switching to low carbon transportation modes. It has been proven to work in numerous cities, although their implementation is not a one-size-fits-all process. Every city must consider the sources of pollution, their location, congestion levels, affected areas, public health risks, and the vulnerable populations impacted. Taking these specific factors into account is essential for designing a context-sensitive and effective policy. In the case of Paris, the implementation has faced significant challenges, leading to public rejection, several postponements, and putting the policy at risk of being withdrawn.

Nevertheless, implementing a policy to reduce air pollution remains essential in Paris in order to comply with the <u>European Ambient Air Quality Directive</u>, which has been transposed into national law through the <u>Mobility Orientation Act (2019</u>) and the <u>Climate and Resilience Act</u> (2021).

There is a recurring debate around LEZs, with arguments often highlighting the social inequalities they may deepen due to the financial burden placed on low-income households. However, the policy intends to address other types of inequalities, such as health, since in Paris, the poorest residents are three times more likely to die from an episode of pollution than the richest residents, therefore being a means to protect the health of vulnerable populations.

Opposition tends to focus on the social tensions created by the goal of improving air quality and the risk of fostering territorial <u>segregation</u>, while supporters of LEZs emphasize the positive results observed in areas where they have been implemented; noting that nitrogen dioxide (NO<sub>2</sub>) concentrations have been reduced by more than a third (in Lyon and <u>Paris</u>). In fact, impact evaluations of the LEZ show that, between 2017 and 2023, NO<sub>2</sub> emissions from road traffic declined by an estimated 42%, with LEZs contributing approximately 6 percentage points to this reduction. Similarly, PM2.5 emissions from road traffic fell by about 32%, with LEZs accounting for around 3 percentage points of that <u>decrease</u>.

The debate has continued to evolve, leading to a vote in committee at the National Assembly in March 2025 on the abolition of LEZs, as part of a broader bill aimed at simplifying economic <u>regulations</u>. It was based upon the results of the Senate Consultation 2023, which revealed the public resistance to LEZs (out of over 51,000 responses from individuals and businesses, 86% of citizens and 79% of businesses expressed opposition to their <u>implementation</u>).

# Part 2: Justification of the Need for Change

In the Low Emission Zone from 2025, Crit'Air 3 vehicles and above are prohibited from circulating, from 8 am to 8 pm, Monday to Friday. Crit'Air 3 cars are diesel cars manufactured before 2011 and gasoline cars manufactured before 2006. They represent 16% of the Greater Paris Area's car fleet (412,000 vehicles). Their partial removal is expected to reduce road traffic emissions of NO<sub>2</sub> by 14%, which is 4% of total emissions, and PM2.5 by 13%, so that 700,000 inhabitants would no longer be above the 2030 European NO<sub>2</sub> pollution norms.

By constraining car use, the policy raises a lot of public acceptability concerns, as the National Assembly's vote reveals. The main failures seem to be threefold: issues of social justice and access to alternatives, lack of information and a positive narrative, and weak coherence and enforcement.

# Fairness and Alternatives: the ability to change and not to use one's car

Although the Crit'Air 3 vehicle ban applies uniformly across the LEZ, its burden falls disproportionately on low-income households. These households are more likely to own older, high-emission vehicles targeted by the ban, yet they are also the <u>least financially able to replace them</u>. 38% of the poorest households have a vehicle rated Crit'Air 4 or 5, while the average out-of-pocket expenses for households benefiting from the ecological bonus or conversion premium remained over €20,000.

Additionally, there is a clear geographic dimension to the inequality. Most of these households are located in the outer suburbs of Paris, where lower housing costs attract modest-income residents, but where access to efficient public transportation is often limited. As a result, the policy places the greatest strain on those with the fewest alternatives and the least means to adapt. While 16% of the vehicle fleet located within the Paris LEZ is classified as Crit'Air 3, certain peri-urban parisian municipalities, often home to populations more socioeconomically disadvantaged than the national average, concentrate a significantly higher proportion of Crit'Air 3 vehicles. For instance, in Gennevilliers, 28% of the vehicle fleet falls under this category, and in Ivry-sur-Seine, the figure reaches 33%, revealing the unequal impact of this policy across the Grand Paris Metropole. Moreover, commuting between peripheral municipalities—where public transport infrastructure is sparse and fragmented—represents significantly greater constraints and costs.

Furthermore, the gradual implementation of the LEZ has substantial repercussions for professions reliant on vehicle use, including artisans, delivery workers, and mobile service providers. For these workers, switching to public transport is not a viable option, and the required vehicle replacement may impose a heavy financial burden, threatening their livelihoods.

#### **Exemptions and Insufficient Financial Support**

To address unequal capacities to adapt to LEZ mobility restrictions, various support measures were introduced, including exemptions, financial aid, and alternatives to car use. The LEZ applies to light vehicles on weekdays from 8 a.m. to 8 p.m., with up to 24 temporary 24-hour passes allowed per year. Full exemptions apply to certain groups like shift workers, people with reduced mobility, and RSA recipients in training. However, a majority of low-income households do not qualify, prompting the necessity for additional financial support.

National aids include the ecological bonus, retrofit subsidy, zero-interest loan, and clean vehicle microcredit, with amounts based on income, vehicle type, and applicant status. However, two financial aids, the conversion premium and LEZ bonus, ended in December 2024, reducing available support. A social leasing scheme offering long-term electric vehicle rentals to low-income households for approximately €100 per month is set to return in September 2025.

Regionally, Île-de-France offers a <u>retrofit subsidy</u> up to  $\[ \in \]$ 6,000 and, from March 2025, hydrogen vehicle aid of up to  $\[ \in \]$ 30,000 for small firms. Locally, the "<u>Métropole Roule Propre</u>" scheme offers up to  $\[ \in \]$ 6,000 for cleaner vehicles and smaller amounts for two-wheelers and bikes, with eligibility based on income and vehicle cost.

Despite these supports, the financial burden for low-income households remains high, highlighting persistent inequalities in adapting to the LEZ.

# Limited Mobility Alternatives to Cars:

The Grand Paris Métropole's LEZ aims to shift away from private car dependency, crucial for air quality and environmental targets. Key to this is the Grand Paris Express, a major public transport expansion intended to revolutionize suburban connectivity and reduce reliance on personal vehicles. However, its full operational capacity is not expected before 2030, potentially later. This extended timeline creates a significant challenge, as commuters and businesses, facing costly fleet adjustments, will encounter stricter LEZ restrictions without the full benefit of these enhanced alternatives. Currently, substantial travel time disparities persist between private cars and public transport for many peripheral routes, often impacting lower-income suburban populations. These communities, while most affected by LEZ compliance costs, also stand to gain the most from the improved air quality and public health outcomes the LEZ and better transport aim to deliver.

Complementing the Grand Paris Express, intermodal mobility hubs are envisioned to integrate various transport modes, particularly on Paris's outskirts, allowing a switch from private vehicles before entering the LEZ. These hubs could also support businesses with cleaner last-mile logistics. However, existing park-and-ride facilities are often underutilized or oversaturated, questioning the efficacy of resource allocation, and new hubs may not be optimally positioned or designed to serve LEZ boundaries effectively. Effectively planned and integrated hubs are essential to provide viable alternatives and healthier local environments, highlighting the critical need for socio-economic equity in the LEZ policy, potentially informed by further research and mapping of income distribution against pollution and traffic data to avoid disproportionately burdening vulnerable groups.

### A Lack of Coherence Undermining the LEZ's Implementation

Although the LEZ is aimed at addressing health pollution, the Crit'Air ranking it relies on does not take into account the entirety of the emissions coming from the car. This creates situations in which a few older but smaller cars that have a general lower impact on health are lower ranked than newer, heavier SUVs. The reason is the Crit'Air only focuses on the age of the car, considering that the newer they are, the stricter environmental standards they comply with (euro norms). Yet, the euro norms only look at the emissions at the exit of the exhaust pipe, neglecting emissions coming from the brakes and the tires, which represent around 50% of the fine particle emissions of a vehicle. This coherence gap undermines social acceptability. Considering the income repartition of new SUVs and older cars ownership, it feeds the class-based case against the policy, arguing that it is a policy for "wealthy Parisians".

Additionally, the policy is virtually not enforced. Currently, authorities only resort to random police checks, which have a very narrow reach, although camera enforcement could technically be feasible. Indeed, the government, which is competent on this matter, has <u>delayed the tendering</u> to find an operator to deploy automatic camera enforcement. Besides, the implementation of the Crit'Air 3 rule was delayed by 3 years, and the sanctions for Crit'Air 3 were delayed by an extra year as a transition period to grant time to raise awareness about the new rule and increase acceptability. But, in making this explicit in the <u>document advertising</u> the policy, the Métropole almost incentivizes not to comply with or even care about the policy. In the end, there are still Crit'air 4 and 5 cars circulating in the LEZ outside of the authorized hours. Besides, interviews highlighted that municipalities did not advertise the policy and its new step because they were not necessarily in favor; it was simply a Grand Paris policy, which means not within the cities' competence, and they did not want to bear the political cost.

Two main concerns can be highlighted here: it puts a penalty on compliant citizens and does not remove the constraints perceived by citizens and the political cost associated with it, without enjoying the benefits of it, since it's not enforced. Moreover, the multiple delays in the implementation undermined the credibility in the enforcement of the policy, delaying the car fleet renewal from businesses, which tend to be the ones lowering the cost of the second-hand market by purchasing new cars more easily.

# Insufficient Public Understanding and Awareness

Despite the LEZ being a major public health initiative, it has poor visibility and clear public skepticism. Only 53% of residents had heard of the policy in 2021, and over 80% of individuals and professionals consulted in 2023 expressed opposition to its implementation. The situation is worsened by technical confusion, shown by the fact that less than half of residents can correctly identify their vehicle's Crit'Air classification. Moreover, public discourse is currently dominated by opposition voices, such as the group 40 millions d'automobilistes, which has shaped the media and consultation narratives with negative arguments. This perception gap and imbalance in public voice present serious obstacles, as broad support is essential for effective enforcement and long-term sustainability. The lack of clear, accessible communication and limited citizen engagement undermines trust and fuels resistance, particularly among communities most affected by mobility and health limitations.

#### All Rooted in a Lack of Political Will that Creates Inertia

Considering that the LEZ is governed through multiple layers of government competences (EU, national, regional, Métropole, cities), there is a challenge to coordinate the different actors. A critical issue in implementing a non-consensual policy is having a political agent driving the policy through and advancing it despite the opposition. While initially regular meetings with ministries to coordinate and plan deployment which was stopped in 2024. However, since it is a politically sensitive issue, no one wants to carry the burden of the policy. It is more advantageous for everyone to escape their responsibility and blame the policy on another entity. This creates a vicious circle: no one wants to publicize and defend the policy, so no information is provided to citizens, undermining its implementation and effectiveness. In the end, it fosters inertia while not alleviating the stigma of punitive environmentalism.

## What's at Stake: Risks of Discontinuing or Redesigning the LEZ

The LEZ's hypothetical repeal necessitates the exploration of alternative regulatory measures to ensure improved air quality. A primary option includes strengthening the <u>periodic technical vehicle inspections</u> to enforce emission standards robustly throughout the full lifespan, also known as 'controle technique.' A reinforced, updated controle technique would make it a more reliable mechanism to improve air quality. Complementary policies could still include the incentivization of fleet modernization and technological advancements to further mitigate emission levels. However, this type of policy would likely <u>yield slower and less predictable air improvements</u> relative to the more targeted approach of LEZs towards localized pollution reduction in the areas more disproportionately affected. In a time when <u>France is already experiencing budget difficulties</u>, a significant policy change could undermine public and investor confidence in its long-term stability and environmental pursuits. Moreover, the potential reimbursement of <u>€3 billion of European subsidies</u>, initially allocated based on the LEZ's implementation, would pose a strong fiscal challenge to the French government as well.

# Part 3: Recommendations for Policy Revision

#### Recommendation 1. Reframe the Communication and Public Participation Strategies

- 1.1: Rebrand the Narrative Around the LEZ To increase acceptability, the LEZ must be rebranded and re-designed, not as a restrictive measure but as a collective, city-wide effort to improve livability, reduce health inequalities, and reclaim shared urban space. Communications should center around a hopeful, inclusive vision of the city's future—one where everyone benefits from cleaner air and healthier neighborhoods. It must avoid moralizing tones or overly technical language, and use storytelling to highlight tangible gains, such as health. Messages should emphasize additive behaviors and position the LEZ as a catalyst for a desirable, community-driven transformation rather than a top-down imposition.
- 1.2: Engage Citizens Through Participatory Processes in the Redesign of the Policy- Go from an informative level to a public consultation level in which people (a sample) share opinions and ideas, with the real possibility of adjusting decisions according to their feedback. Citizens must be active co-creators of the redesign of LEZ, not passive recipients. Being invited to shape aspects of implementation, from defining the affected zones and schedules to enforcement methods and support measures, builds ownership, empowerment, and boosts compliance, therefore improving the policy's social legitimacy. By embedding the LEZ in a participatory urban strategy, the policy becomes part of a broader democratic project—one where clean air is a shared achievement, not a bureaucratic decree.

## Recommendation 2. Improve the Coherence to Increase the Sense of Fairness

**2.1: Updating CritAir norms**: update the norms so that they **take into account the overall pollution.** This would guarantee that the criteria reflect the level of pollution each vehicle emits. This would not only improve the coherence but also improve the acceptability and sense of fairness for citizens. Although this is a national competence, advocating for such a measure would improve the overall coherence of the policy and undermine some key arguments against it.

**2.2:** Enforcement: implement automated camera control of the cars circulating in the LEZ and stick to the calendar. - They ensure consistent enforcement, avoiding perceptions of arbitrariness or leniency. Sticking to the timeline shows political commitment and allows citizens and businesses to plan and adapt. It also maximizes environmental impact by promoting broad compliance. Without strict and automated enforcement, the LEZ risks being seen as ineffective or symbolic, undermining public support.

## Recommendation 3. Create Viable Car Alternatives for Commuters and Businesses

- **3.1:** Strengthening Existing Alternative and Targeted Support: Prioritizing equitable transitions through targeted support is critical alongside the full realization of the Grand Paris Express; thus, immediate and substantial investment must be channeled into upgrading existing public transport networks, as well as bike infrastructure, that serve these identified priority areas. Finally, to facilitate individual adaptation, personalized support mechanisms, akin to the Brussels 'mobility coach' model, should be introduced. This would involve offering tailored advice to help individuals navigate and adopt the optimal combination of alternative transportation options suited to their specific background, travel needs, and demographic circumstances, potentially including a free trial period for various services to lower barriers to adoption and encourage a sustained shift away from car dependency.
- 3.2: Phase-In LEZ with Business & Infrastructure Adaptation: Directly linking the LEZ's implementation timeline, most notably stricter enforcement, to the demonstrable viability of transportation alternatives. For example, it is worth considering only fully implementing the Crit'Air 3 requirement when Metro line 15 is fully operational, though a variety of different variable combinations can be aligned with the LEZ timeline. Moreover, robust programs must be implemented in a timely manner to facilitate the transition for businesses, especially small and medium-sized enterprises. This includes proactive measures such as establishing accessible urban micro-consolidation centers to streamline last-mile logistics, providing tangible technical support (e.g. training) for businesses to adopt cleaner logistics solutions like cargo bikes or electric vans, and creating effective incentives to encourage off-peak hour deliveries, thereby mitigating both congestion and the economic impact on commercial operations.

# Recommendation 4. Redesign Subsidies to Support Transition

**4. Redesigning financial assistance in a more targeted way** to enable stronger support for the most vulnerable households in changing their vehicle. In addition to economic criteria, subsidies could also be more generous for individuals who do not have viable public transportation alternatives between their home and workplace. From this perspective, the reintroduction of the social leasing scheme in September 2025 should be expanded to reach as many households as possible, with priority given to those living in areas that exceed pollution thresholds and have limited access to public transportation.

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