

Civil Society Vision for a Zero Pollution Future

The European Green Deal's commitment to create a toxic-free environment and achieve Zero Pollution is an essential and long awaited commitment to put people's health and the protection of environment at centre stage of policy making, while giving a clear direction to business as to the common future that we seek.

Zero pollution is already a commitment under EU law and should be based on a broad definition of pollution as set in the Industrial Emission Directive (IED) . All Member States are bound by it, as they are bound by the principles defined in EU Treaties that they all signed up to. Some EU legislation already embraces zero pollution ambition - for example the obligation to phase out priority hazardous substances under the Water Framework Directive or Substances of Very High Concern (SVHC) under REACH Regulation. The Zero Pollution Action Plan needs to build on those approaches and the principles enshrined by EU Law and break the policy silos approach.

In practice, what is needed is for decision-makers across the board to commit to zero harm from pollution to people and planet, zero money for pollution and no delay in action.

The costs of policy inaction or late action are both too high to be acceptable, AND the benefits of action are higher than the cost of action. It is all our interests to **mainstream a commitment to zero pollution in all policy and legislative proposals, as well as in funding.** The European Commission's Green Oath to "do not harm" needs to be systematically applied, and the do no significant harm (DNSH) principle must be considered a key operational tool in addition to proper assessment of environmental impact under EIA and SEA Directives.

Key facts of health and environmental impacts of pollution

Pollution is the leading environmental [cause](#) of disease and premature death. This "[incessant exposure](#)" is linked to a [silent pandemic](#) of disease, according to the UN. Toxic air, water, soils and workplaces is [estimated](#) to kill at least 9 million people a year worldwide. Occupational cancers are the [leading](#) cause of workplace deaths in the EU. Eighty five percent of occupational cancer cases [come](#) from exposure to only ten chemical agents.

Air: Air pollution is the biggest environmental risk to human health, is degrading ecosystems and causing biodiversity loss and has significant human and economic costs. It is responsible for around 400 000 premature deaths per year in the EU. The cost of inaction far exceeds the cost of action: according to Commission estimations, the full implementation of existing EU clean air legislation could lead to net benefits of up to EUR 42 billion a year in 2030, notably from lower mortality and morbidity rates. Poor indoor air quality related to the burning of solid fuels results in nearly 26 000 premature

deaths annually across the EEA-39. There is early evidence to suggest that long term exposure to air pollution may increase susceptibility to COVID-19. Air pollution is also linked to early onset dementia, birth weights, cranial capacity (1).

Noise: Noise is the second most significant environmental risk, with exposure to environmental noise causing 12 000 premature deaths annually and contributing to 48 000 new cases of ischaemic heart disease. It is estimated that 22 million people suffer chronic high annoyance and 6.5 million people suffer chronic high sleep disturbance.

Chemicals: A wide range of chronic diseases is associated with exposure to hazardous chemicals, with the WHO estimating that 2.7 % of global deaths are attributable to chemical exposure. Chemicals which disrupt the hormone system – also known as 'endocrine disrupting chemicals' (EDCs) – may be a contributing factor behind the significant increases in cancers, diabetes and obesity, falling fertility, and an increased number of neurological development problems in both humans and animals.

Water pollution can have an impact on health via contaminated drinking water extracted from groundwater or surface water or contact with contaminated bathing waters, as well as through indirect exposure through the consumption of fish containing bioaccumulative pollutants, such as mercury.

Light: Light pollution [has been found](#) to be a major driver of insect declines, overlooked to date as well as a cause for diseases and health conditions such as sleeping disorders.

In addition: **Resource consumption:** human activities come with negative environmental impacts due to (over)use and consumption of resources and potential land use conflicts. This does not only relate to over-consumption of resources (biogenic origin) but also about critical minerals and water availability.

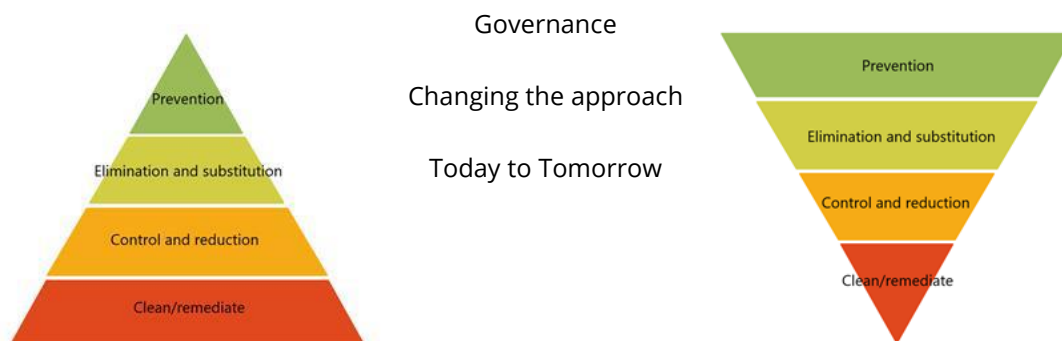
Source: EEA *Healthy environment, healthy lives: how the environment influences health and well-being in Europe*, 2019

(1) Source: EEA Air Quality in Europe – 2020 report; European Parliamentary Research Service European Implementation Assessment 'EU policy on air quality: implementation of selected EU legislation', 2021; Amann, M. et al., Support to the development of the Second Clean Air Outlook – Specific Contract 6 under Framework Contract ENV.C.3/FRA/2017/0012 (Final Report), European Commission.

The Zero-Pollution Action Plan should mean zero-pollution ambition **within the EU AND at a global scale**, therefore considering the impacts of the EU's way of life, its policies and global actions. This is a question of ethics, responsibility, consistency and influence.

Refreshed governance: To advance, we need to move from the current approach reliance on clean up, remediation and control to one prioritising prevention, elimination and substitution (see figure). However, in order to ensure proper implementation, the Zero Pollution Action Plan should contain specific and measurable targets and deadlines

Civil Society Vision for a Zero Pollution Future - draft for discussion



Defining “Zero pollution” and scoping of action

The Industrial Emissions Directive provides a definition of ‘pollution’; Art. 3 (2): *‘pollution’ means the direct or indirect introduction, as a result of human activity, of substances, vibrations, heat or noise into air, water or land which may be harmful to human health or the quality of the environment, result in damage to material property, or impair or interfere with amenities and other legitimate uses of the environment;*

This definition implies that any form of impact from substances, vibrations, heat or noise (be it intentional or unintentional) that may either be harmful to human health or the quality of the environment, even if it is merely “impairing or interfering with amenities” of the environment, is considered as a pollution.

Furthermore, the overall objectives that EU legislation and actions must deliver on are given in the Treaties - TFEU art. 191 (1) says *‘Union policy on the environment shall contribute to pursuit of the following objectives:*

- preserving, protecting and improving the quality of the environment,
- protecting human health,
- prudent and rational utilisation of natural resources,
- *promoting measures at international level to deal with regional or worldwide environmental problems, and in particular combating climate change’.*

The TFEU also defines what are the key principles guiding the EU in its actions towards achieving those objectives; those are:

- **Transparency:** through accessible decision-making processes; publicly available pollution data
- **Precautionary principle:** by anticipating protective actions in case a risk cannot be determined with sufficient certainty, to protect the environment and people’s health
- **Pollution prevention principle:** preventing pollution by acting at source (e.g. establishing legally binding standards for avoiding pollution);
- **Polluter-pays principle:** by keeping polluters accountable

The term ‘pollution’ clearly includes the negative impacts of resource use and associated footprint of any anthropogenic activities.

How the European Green Deal can deliver Zero Pollution

The EU Green Deal identifies the following objectives to be achieved through the ZPAP:

- Creating a **toxic-free environment** through more action to **prevent pollution** from being generated as well as measures to clean and remedy it (**Chemicals Strategy for Sustainability**);
- Protect citizens and the environment better against hazardous chemicals and encourage the development of **safe and sustainable alternatives** (**Chemicals Strategy for Sustainability**);
- Restoring the **natural functions of ecosystems** to be resilient to and help reduce pollution including the EGD commitment to restore "natural functions of ground and surface water (since it is essential to preserve and restore biodiversity in lakes, rivers, wetlands and estuaries" (**EGD Communication**);
- The risk and use of **chemical pesticides is reduced by 50%** and the use of more hazardous pesticides is reduced by 50% (**Biodiversity and 'Farm to Fork Strategies**);
- The losses of **nutrients from fertilisers** are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20% (**Biodiversity and 'Farm to Fork Strategies**);
- Significant progress has been made in the **remediation of contaminated soil** sites (**Biodiversity Strategy**);
- Source measures to address **pollution from urban runoff**, harmful sources of pollution such as micro plastics, chemicals (including pharmaceuticals) and combination effects;
- **Achieve cleaner air**, including the revision of air quality standards to align them more closely with the **WHO recommendations**;
- Strengthening provisions on monitoring, modelling and air quality plans to help local authorities achieve cleaner air and reducing ozone concentrations and emissions through the **Methane Strategy** and the **Renovation Wave**;
- Address **pollution from industrial installations**, working on the scope of industrial production legislation (e.g. **IED / Seveso III**) also to make it fully consistent with climate, energy and circular economy policies and improve prevention of industrial accidents (**Industrial Strategy**);
- **A clean and circular economy** (**Circular Economy Action Plan** and **Chemicals Strategy for Sustainability**).

The ZPAP, and its objectives, are directly connected to the Toxic-Free Environment Goal, as well as the goal to achieve a decarbonised, circular and restorative zero-pollution economy (see also 8th EAP). They are also connected to many key European Green Deal's initiatives as highlighted above, including: The Biodiversity Strategy, the Farm to Fork Strategy, the Chemicals Strategy for Sustainability, the Renovation Wave Strategy, the Methane Strategy, the Industrial Strategy, as well the Smart and Sustainable Mobility Strategy, the Beating Cancer Action Plan and the climate neutrality objective.

The ZPAP should therefore set out and become the guiding framework for zero pollution ambition and set the necessary monitoring, benchmarking and enforcement mechanisms to deliver on the “zero pollution” ambition in the most holistic and coherent way.

What is needed – Operationalising the vision

The ZPAP must provide the tools and framework to achieve the following objectives/targets **by 2030** as well as set specific and measurable targets and deadlines:

Examples of key targets on pollution impacts

- Aim to reduce to **zero premature deaths and diseases due to anthropogenic air pollution; air pollution impact on ecosystems and biodiversity is reduced** to not exceed critical loads and levels;
- **Industrial activities** are carried out in full compatibility with achieving environmental quality standards / *acquis* and the **set ‘zero pollution’ goals**, based on a new benchmarking approach set to lowest ratio of ‘environmental impact of activities versus public good/service provided’;
- **Reduce by 50% the risk, production levels and use of industrial chemicals** as well as the percentage of chemicals with properties hazardous for human health or the environment;
- **Achieve the climate neutrality by 2040 target**, achieving climate action to ensure below 1.5 degrees scenario / and maximum [300] ppm GHG in atmosphere target, unless climate science sets stricter target level;
- **Phase out, at the latest, fossil fuel use by 2040 and the sale of internal combustion engines by 2035.**
- Commit to a **phase out of industrial animal farming**, which causes direct air and water pollution and indirect pollution from intensive feed production and set out a robust action plan for the transition to ‘less and better’ animal farming and meat, dairy and eggs production and consumption.

Examples of key actions on nature

- **Deploy nature-based solutions (NbS)** as a systemic solution to tackle remaining air, water and soil pollution on a large scale – this must include a clear commitment and pathway to transition the EU’s agriculture sector to agroecology in order to phase out the use of synthetic inputs and restore agro-ecosystems;
- **Restore 15% of EU’s land and in sea** focusing on ecosystems important for biodiversity and climate and free flowing rivers through regulation setting legally binding restoration targets;
- Recognise significant negative impact of **light pollution** and develop an EU level action to address it.
- **Achieve good chemical and ecological status** in water bodies by 2027 and revise EU legislation to address pollution by pollutants of emerging concern Achieve **WHO Environmental Noise Guidelines** for the European Region’s standards on traffic, railway, aircraft, wind turbine and

leisure noise; therefore reducing noise related premature deaths, new cases of ischaemic heart disease, the number of people suffering chronic high annoyance and the number of people suffering chronic high sleep disturbance;

- **A 100% remediation target of contaminated sites** and a zero-accidents involving hazardous substances released target;

Examples of governance recommendations

- **Zero tolerance to polluters** and full internalisation of pollution costs in any policy and finance frameworks;
- **Improved benchmarking and compliance promotion** tools so to track efforts made in delivery by all economic actors;
- **Improved transparency** on the pollution life-cycle and **accountability** in decision making processes.

It is key that the EU develops an ambitious overarching action plan which:

- Effectively **prevents**, and for essential activities or uses, **reduces pollution at source**;
- Fully **addresses pollution both from a sectoral and horizontal approach** of all related strategies and policies and focus on “essential services or products” concept which have a wider public benefit;
- Is **coherent** and creates bridges and has **synergies** among all related EU laws and policies (e.g. on chemicals, industry, water, noise, and air, etc.)
- Provides the necessary tools and instruments to continuously improve on the efforts and benchmarking (of all economic actors involved) so to ensure **proper tracking of progress** towards delivery of the set action plan.
- Is bold in which **policy instruments** to take and abandons counterproductive dogmas that limit progress - such as ‘technology neutrality’, ‘fuel choice’, command and control type versus market-based instruments, ‘acceptable risk’ or exposure-based thresholds.

ZPAP is expected to set a potentially transformative agenda, essential for the credibility of the European Green Deal and to deliver a zero pollution future next generations deserve. The systematic integration of the growing scientific evidence on pollution impacts should lead to an accelerated and high ambition agenda. Citizens and the planet deserve nothing less.

Civil society will present specific recommendations in subsequent position papers and looks forward to engaging with decision makers on ZPAP's design and implementation as well as helping mainstream zero pollution ambition across policy, legislation and funding.