



European Economic
and Social Committee

OPINION

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Zero Pollution Action Plan for air, water and soil

Communication from the Commission to the European Parliament, the Council,
the European Economic and Social Committee and the Committee of the Regions –
Pathway to a Healthy Planet for All

EU Action Plan: "Towards Zero Pollution for Air, Water and Soil"
[COM(2021) 400 final]

NAT/830

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Outcome of vote (for/against/abstentions)	105/0/1

1. Conclusions and recommendations

- 1.1 The EESC supports the Commission's plan to address the various types of pollution in a holistic way and to comply with the commitments of the Paris Agreement and the Sustainable Development Goals (SDGs). For it to be a truly ambitious plan, the targets must be fully in line with the recommendations of the World Health Organisation (WHO) and made more ambitious from the outset, that is to say now.
- 1.2 The EESC urges the Commission to start collecting data so that it can make legislative proposals soon in areas where they are lacking, such as light and vibration pollution.
- 1.3 It therefore welcomes the establishment of the Zero Pollution Stakeholder Platform to speed up decontamination and would like to collaborate through the European Circular Economy Stakeholder Platform and other means.
- 1.4 The EESC regrets that, in the zero pollution hierarchy, remedying and offsetting pollution-related damage is given less consideration. Measures need to be defined for when polluters cannot be identified or cannot offset the damage.
- 1.5 The EESC suggests that when assessing sources of particulate material (PM), their oxidative potential and ultrafine particles should be included in legislation and PM pollution monitoring.
- 1.6 To fight marine pollution, all ports should possess an advanced system for the collection and management of waste. In addition, the EU should continuously encourage measures for removing litter from the sea, both to boost decontamination and to secure a secondary fishing activity.
- 1.7 Part of plastic pollution in the sea comes from internal waters. Cleaning up our European rivers requires coordination between the countries concerned.
- 1.8 The EESC believes that waste management should be harmonised and that waste should be managed and reused where it is produced or where there are appropriate recycling facilities, in order to avoid it adversely affecting third countries.
- 1.9 Although targets are set at EU level, the EESC recommends setting minimum thresholds for each country, in order to ensure that all Member States make sufficient progress despite going at different rates.
- 1.10 The EESC urges the Member States and the Commission to speed up the process of transitioning to renewable energy sources, which are so important if companies are to succeed in decarbonising production.
- 1.11 The EESC congratulates the Commission on the citizen science strategy for involving and engaging people, raising awareness of pollution, health and wellbeing issues.

2. Commission proposal

- 2.1 The EU Action Plan on Zero Pollution for Air, Water and Soil is one of the final cornerstones of the Green Deal. It makes reducing pollution to levels which are not harmful to human health or the environment a key target for 2050. The Commission will integrate and tie together all ongoing actions on numerous pollution objectives at the same time.
- 2.2 Under EU law and Green Deal ambitions and in synergy with other initiatives, by 2030 the EU should reduce:
 - by more than 55% the health impacts (premature deaths) of air pollution;
 - by 30% the share of people chronically disturbed by transport noise;
 - by 25% the EU ecosystems where air pollution threatens biodiversity;
 - by 50% nutrient losses, the use and risk of chemical pesticides, the use of the more hazardous ones, and the sale of antimicrobials for farmed animals and in aquaculture;
 - by 50% plastic litter at sea and by 30% microplastics released into the environment;
 - significantly total waste generation and by 50% residual municipal waste.
- 2.3 The Zero Pollution Monitoring and Outlook Reports planned for 2022 and 2024 will aim to assess progress towards meeting the 2030 targets and will be the benchmark for deciding which measures need to be implemented or strengthened to ensure that these targets are met successfully. At that point, the next steps for achieving zero pollution by 2050 will be outlined.
- 2.4 The European Commission, together with the European Committee of the Regions, will launch the Zero Pollution Stakeholder Platform.
- 2.5 The Marine Strategy Framework Directive will be reviewed by 2023 with the aim of reducing plastic and other litter, underwater noise and contaminants.
- 2.6 The review of the Urban Waste Water Treatment Directive and the Sewage Sludge Directive will raise the level of the ambition to remove nutrients from wastewater and make treated water and sludge ready for reuse.

The Waste Shipment Regulation will be reviewed to better monitor waste exports, ensure their sustainable treatment and restrict exports that have harmful environmental and health impacts in third countries.

3. General comments

- 3.1 As stated in the Action Plan, the fight against pollution is also a fight for fairness, as the most harmful impacts on health are borne by the most vulnerable groups. These include children, older people or people with medical conditions, people with disabilities and those living in

poorer socio-economic conditions¹. Worldwide, low- and middle-income countries bear the brunt of pollution-related illnesses, with nearly 92% of pollution-related deaths².

- 3.2 The EESC supports the Commission's plan and its flagship initiatives to address the various types of pollution in a holistic way and to comply with the commitments of the Paris Agreement and the SDGs. For it to be a truly ambitious plan, the targets must be fully in line with the recommendations of the WHO.
- 3.3 The EESC endorses the approach of strengthening existing legislation in different areas and adjusting it where it has not been successfully implemented, for example with regard to water and air quality. We reiterate that EU environmental policy reveals that poor, fragmented and uneven implementation of the EU environmental legislation is a serious problem in many EU Member States³. Moreover, there is no lack of knowledge about what needs to be done. What is lacking is the implementation of well-known measures, often decided upon long ago, as well as political will⁴.
- 3.4 The EESC urges the Commission to start collecting data so that it can make legislative proposals soon in areas where they are lacking, such as light and vibration pollution.
- 3.5 The extent to which the targets have been met will be assessed on the basis of the monitoring and outlook findings for 2024. This will open the debate evaluating the level of ambition and, if necessary, revising objectives and legislation more thoroughly. The EESC fears that this process will be too long given the short amount of time left to achieve the 2030 targets, and believes that they should be made more ambitious from the outset, that is to say now.
- 3.6 The air pollution targets set for 2030 are based on reference years from too long ago. The reference years are different for the different targets because they are based on different data and legislation. While long periods of cumulative data clearly make it easier to make projections, the EESC believes that the start of the time period used to assess progress towards targets should be aligned for all the targets in order to obtain a realistic picture of the degree of compliance.
- 3.7 The right enabling framework must help businesses and SMEs to implement pollution control legislation while keeping administrative burdens to a minimum. There is also a need for a harmonised international regulatory framework, as EU pollution does not stop at borders.
- 3.8 The EESC believes that cooperation between sectors is essential to bring about the transition. It therefore welcomes the establishment of the Zero Pollution Stakeholder Platform and would like to collaborate through the European Circular Economy Stakeholder Platform⁵ and other

¹ EEA Report No 22/2018: *Unequal exposure and unequal impacts*.

² UNEP/EA.4/3 (2018): Implementation plan "Towards a Pollution-Free Planet".

³ [OJ C 110, 22.3.2019, p. 33](#).

⁴ [OJ C 123, 9.4.2021, p. 76](#).

⁵ [European Circular Economy Stakeholder Platform](#).

means. It also recommends establishing close cooperation with third countries and spaces for cooperation between civil society in the different regions, as pollution has no borders.

4. Specific comments

- 4.1 EU support for innovation, investment and research on new equipment and technologies is important for all businesses and to create new quality jobs. However, investment is needed in nature and biodiversity (ecosystem restoration and regenerative agriculture); prosperity (sustainable infrastructure and renewable/energy transitions, buildings and green/public mobility); and people (education and bridging the digital divide/R&D, tax reforms to create fairer and more equitable opportunities in education, health and the environment).
- 4.2 The EESC regrets that, in the zero pollution hierarchy, remedying and offsetting pollution-related damage is given less consideration. The polluter pays principle has not proved to be very effective, as shown by the high number of contaminated sites that still exist in the EU. Measures need to be defined for when polluters cannot be identified or cannot offset the damage.
- 4.3 With regard to air pollution, the EESC draws the Commission's attention to particulate matter (PM), which is linked to millions of premature deaths worldwide. A standardised metric for assessing the toxicological effects of PM on human health should be established based not just on mass concentration but on size and chemical composition as well. When assessing sources of PM, their oxidative potential and ultrafine particles are important, as how dangerous they are depends on that, and they should be included in legislation and PM pollution monitoring.
- 4.4 Water legislation will be adapted to reduce chemical pollutants and microplastics (MPLs). Plastic waste is deeply worrying as it is difficult to eliminate and acts as a magnet adsorbing other pollutants, and the high chemical and toxicological impact of its additives and of the products of its fragmentation – nanoplastics (NPLs) – is not considered⁶. OECD countries contribute greatly to plastic litter produced in other countries, so solutions to cross-border pollution need to be found and a new specific global limit for plastic litter should be established. Prevention is also essential: ecodesign production must be encouraged with incentives. Industry and environmental science must work together to search for viable solutions.
- 4.5 It is important, particularly in the agriculture sector, to invest in innovation in technologies and operating models that facilitate water reuse and improve water quality, and to implement solutions to reduce the environmental footprint (e.g. in the area of fertilisation, use of pesticides and nitrate emissions). Operator capacity-building and training in new technologies and digital solutions will facilitate their implementation and compliance with water regulations.
- 4.6 Waste from fishing activities, in particular fishing nets, must be scrupulously managed. Since plastic waste in the sea moves in random patterns, international rules must be enforced, or at least broken down according to plastic production and consumption in each country, so that those who pollute the most have to pay more. NGOs and some countries have demonstrated that

⁶ See Sendra *et al.*, 2020.

there are tools and people with the ability to remove marine litter and the necessary port structures can be created to store and recycle it⁷. However, the measure is not applied because fishers do not derive any economic benefit from collecting and sorting waste and small ports are not yet prepared for this activity. All ports, including smaller ones, should possess an advanced system for the collection and transparent management of waste⁸. The EU should continuously encourage these measures, both to boost decontamination and to secure a secondary fishing activity⁹.

- 4.7 Eighty percent of waste in the oceans passes through inland waters (lakes and rivers)¹⁰. Managing and monitoring the issue at source is more effective. Cleaning up our European rivers requires coordination between countries. However, the countries concerned have very different legal systems and different levels of government requirements with respect to river basin management.
- 4.8 The EESC considers that addressing chemical mixtures is a relevant step forward in the risk assessment of chemicals. Research and development are crucial for progressing in terms of knowledge, assessment and management of mixtures¹¹.
- 4.9 Steering the EU towards zero pollution also requires incentives to facilitate change, training in new technologies and digital solutions, technical assistance, social education and the harmonisation and implementation of production and consumption good practice guides. Sufficient renewable energy at affordable prices and zero- or low-carbon gaseous fuels need to be available to businesses for them to be able to decarbonise their manufacturing processes. The EESC urges the Member States and the Commission to speed up the process of transitioning to renewable energy sources.
- 4.10 The review of the Industrial Emissions Directive (IED) provides a high level of protection for the environment as a whole. Implementing Best Available Techniques Not Entailing Excessive Costs would be a more appropriate approach for SMEs. The implementation of the Industrial Emissions Directive should cover the whole value chain, including the sourcing of raw materials outside the EU. Compliance levels should be legally binding for industrial emissions, and standardised, reliable monitoring methodology is needed for comparison of accurate data and harmonised assessment ensuring a level playing field across EU industry.
- 4.11 The EESC considers the Skills Agenda to be a key element for the development of the labour market, guiding training of professionals to make them climate-, environment- and health-conscious. It also welcomes the training of health and social workers which will improve their capacity to cope with environmental risks. This is a strategy that will make it easier for

7 [Directive \(EU\) 2019/883](#).

8 [OJ C 62, 15.2.2019, p. 207](#).

9 [Can fishers help cleaning the sea from plastic waste?](#), ETF.

10 United Nations Environment Programme, Marine plastic debris and microplastics, 2016.

11 [OJ C 286, 16.7.2021, p. 181](#).

entrepreneurs, businesses, SMEs, the self-employed and all workers to adapt, minimising job losses.

- 4.12 Cities and regions are at the forefront of implementing anti-pollution programmes. The efforts of local and regional authorities are key to delivering on the agenda. It is crucial to harmonise requirements and measures in all regions and to ensure that they are implemented and the targets finally achieved in a way that is constant over time, regardless of political change. Although targets are set at EU level, the EESC recommends setting minimum thresholds for each country, in order to ensure that all Member States make sufficient progress despite going at different rates.
- 4.13 It is important to harmonise waste management, as separation and treatment do not work in the same way across all EU regions or locally in each country, reducing the effectiveness of pollution prevention and management. The export of any waste that does not comply with EU standards should be prohibited, regardless of the regulatory measures of the country to which it is intended to be exported. In addition, EU waste should be managed and reused where it is produced or where there are appropriate recycling facilities, in order to avoid it affecting third countries, unless the waste is used as a raw material in environmentally friendly sustainable production.
- 4.14 The Commission is going to develop an integrated Zero Pollution Monitoring and Outlook Framework to assess the health, environmental, economic and social impacts of pollution. Monitoring river status should also be included. The data should be collected using standardised methods and should be transparent, reliable, traceable and available to all. The database should integrate the sources from the main institutions associated with the Commission and also from any recognised institution wishing to help monitor pollution and its impact.
- 4.15 The EESC congratulates the Commission on the citizen science strategy for involving and engaging people, raising awareness of pollution, health and wellbeing issues. This will enable people to monitor pollution and integrate data collected for decision-making. If it is to succeed, coordination must be ensured between authorities, NGOs, communities and science.

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