



ZERO POLLUTION ACTION PLAN CONSULTATION

Surfrider Foundation Europe's answers to the citizen consultation

February 2021

The European Commission has launched a citizen consultation in the framework of its action plan "*Towards Zero Pollution Ambition for air, water and soils*". Surfrider Foundation Europe (Surfrider Europe) invites every European citizen to take part in the consultation in order to make the voice of the Ocean heard.

To guide you in the process, Surfrider Europe shares with you its answers to the consultation. This document aims at informing you on our positions, but the consultation remains yours to answer. Surfrider Europe trusts each of you and your love for the Ocean to defend it in your own way before the Commission.

The consultation is divided in two parts: a general section and an expert section. Surfrider Europe, as an environmental NGO, has answered both, but invites you to **answer the general section only**.

PART 1: GENERAL SECTION

1. GENERAL AWARENESS OF POLLUTION AND RELATED POLICIES

This section of the questionnaire seeks to gather information on the general level of knowledge of EU environmental pollution and related policies in Europe, and their evolution over time. It seeks to gather information about knowledge of the effects of pollution on people and the environment, and about knowledge of related EU policy in broad terms.

1.1 To what extent do you agree with the following statements about the impact of pollution through air, water and soil?

- Current levels of pollution have a negative impact on my health or the health of those immediately around me - *completely agree*

- Pollution has negative impacts on the wellbeing of the population in specific locations in the EU - ***completely agree***
- Current levels of pollution have negative impacts on the health of the overall population in the EU - ***somewhat agree***
- Currently, pollution has negative impacts on the environment and particularly biodiversity in my immediate surroundings - ***completely agree***
- Currently, pollution has general negative impacts on the environment and particularly biodiversity - ***completely agree***
- Current levels of pollution have general negative impacts on the economy - ***completely agree***

1.2 To what extent do you agree or disagree with the following statements?

- Pollution is an issue of concern worldwide - ***completely agree***
- Pollution is an issue of concern in the EU - ***completely agree***
- Pollution is an issue of concern primarily outside of the EU - ***neither agree nor disagree***
- Pollution is an issue of concern in my country - ***completely agree***
- Pollution is an issue of concern in my municipality - ***completely agree***
- I feel sufficiently informed about pollution where I live - ***somewhat agree***
- I feel sufficiently informed about health consequences of pollution where I live - ***somewhat agree***
- Pollution has been reduced in the last decade where I live - ***somewhat agree***

To what extent do you agree with the following statements about the impact of pollution on different population groups?

- People living in cities are more exposed to pollution than in rural areas - ***neither agree nor disagree***
- People living in rural areas are the most exposed to pollution than in urban areas - ***neither agree nor disagree***
- People living in poverty/at risk of poverty are the more exposed to pollution than others - ***neither agree nor disagree***
- Everyone in our society is equally exposed to pollution - ***somewhat agree***
- Children and the elderly suffer more from pollution than others - ***completely agree***
- Other : ***People living by the sea and water bodies are seeing pollution increasingly impacting these natural areas***

1.4 Have you heard about the following EU initiatives addressing pollution? If so, how much do you know about them?

- EU Clean Air policies such as the Ambient Air Quality Directives and the National Emission reduction Commitments (NEC) Directive - ***Not well informed***
- EU Water policies such as the Water Framework Directive, the Marine Strategy Framework Directive, the Urban Wastewater Treatment Directive, the Drinking Water Directive and the Bathing Water Directive, the Nitrates Directive - ***Very well informed***
- EU Soil policies such as the Soil Thematic Strategy or the Sewage Sludge Directive - ***Moderately informed***
- EU Noise policies such as the Environmental Noise Directive - ***Moderately informed***
- EU policies on industrial emissions, notably the Industrial Emissions Directive - ***Moderately informed***

- EU policies on chemicals, such as the REACH Regulation and regulation on pesticides - ***Moderately informed***
- EU policies on medicines (also known as medicinal products), such as directives or regulations, and the 2019 EU Strategic Approach to Pharmaceuticals in the Environment - ***Moderately informed***
- Farm to Fork Strategy - ***Moderately informed***
- Biodiversity Strategy - ***Moderately informed***
- EU policies limiting air pollution at source, such as Euro standards for cars, buses and trucks, or eco-design rules for heating appliances - ***Not at all informed***
- EU policies addressing pollution from waste, such as from persistent organic pollutants (POPs) - ***Moderately informed***
- Other EU policies on pollution - ***Moderately informed***

2. VIEWS ON THE STATE OF POLLUTION AND RELATED POLICIES

This section of the questionnaire seeks to gather views about the state of pollution and the importance of pollution in the wider context of environment policy.

2.1 How important is it to address the following pathways (the way pollution moves from its source once it has been released into the environment) and depositories (the eventual recipients of pollution, where it then accumulates) of pollution at the EU level?

- Ambient air pollution - ***Very important***
- Indoor air pollution - ***Very important***
- Pollution of rivers, lakes and ground water - ***Very important***
- Marine pollution - ***Very important***
- Soil and sediment pollution - ***Very important***
- Noise pollution - ***Very important***
- Other types of pollution - ***Very important***

If “other” please specify - ***Underwater noise pollution as a result of shipping activities or oil and gas exploration, has devastating consequences on mammals (e.g. hearing loss, beach strandings) but also fish and crustacean, as there is evidence of catch rates being reduced by 40-80% near the sites where seismic testing was conducted¹.***

2.2. How do you evaluate the impact of the following activities on pollution?

- Agriculture: animal farming - ***Highly polluting***
- Agriculture: crop production - ***Highly polluting***
- Fisheries - ***Highly polluting***
- Aquaculture - ***Highly polluting***
- Mining and extraction of raw materials - ***Highly polluting***
- Industrial production - ***Highly polluting***
- Road transport - ***Highly polluting***
- Rail transport - ***I don't know***

¹ A. Gillespie, “The Impacts of Seismic Exploration and International Law”, January 2011. URL : https://oceancares.org/wp-content/uploads/2016/07/Paper_L%C3%A4rm_Gillespie_The-impacts-of-seismic-exploration_EN_2011.pdf

- Shipping - *Highly polluting*
- Air transport - *Highly polluting*
- Waste landfilling - *Highly polluting*
- Waste incineration - *Highly polluting*
- Waste recycling - *Highly polluting*
- Energy production from fossil fuels - *Highly polluting*
- Energy production from biomass - *Highly polluting*
- Wind and solar energy production - *Somewhat polluting*
- Accidental release of hazardous substances - *Highly polluting*
- Littering - *Highly polluting*
- Heating and cooling buildings - *Highly polluting*
- Other - *Highly polluting*

If “other” please specify - *Plastic production (more than littering): from production (extraction, use of fossil fuels, petrochemical installations, pellet spills) to their (mostly single-) use and end of life (marine litter); water treatment: spills of filter media used in wastewater treatment processes; coastal urbanization linked to tourism causing soil waterproofing.*

2.3. To what extent do you agree or disagree with the following statements?

- My consumption habits contribute to environmental pollution in my immediate surroundings - *Completely agree*
- My consumption habits contribute to environmental pollution in my country - *Completely agree*
- My consumption habits contribute to environmental pollution in the EU - *Completely agree*
- My consumption habits contribute to environmental pollution globally - *Completely agree*

2.4. Which level of government is the most appropriate to address pollution in the EU Member States?

- Overall, the most appropriate level of government to address pollution is... *EU level authorities*
- The most appropriate level of government to address ambient air pollution is... *EU level authorities*
- The most appropriate level of government to address pollution of rivers, lakes and ground water is... *EU level authorities*
- The most appropriate level of government to address marine pollution is... *EU level authorities*
- The most appropriate level of government to address soil and sediment pollution is... *EU level authorities*
- The most appropriate level of government to address noise pollution is... *EU level authorities*

2.5. In your opinion, is each of the following currently doing too much, enough, or not enough about pollution?

- Product manufacturers - *Not doing enough*
- Services providers - *Not doing enough*
- Food producers (farmers, aquaculture producers, fisheries) - *Not doing enough*
- Energy producers - *Not doing enough*

- Banks and investors - ***Not doing enough***
- Consumers - ***Not doing enough***
- Your local or regional government - ***Not doing enough***
- Your national government - ***Not doing enough***
- The European Union - ***Not doing enough***
- International organisations - ***Not doing enough***
- Social partners - ***Not doing enough***

3. WAYS FORWARD TO ADDRESS POLLUTION

This section of the questionnaire seeks to gather views on how pollution should be addressed in the future.

3.1. In your opinion, how effective would the following ways of tackling pollution be?

- Greater powers to national authorities to sanction breaches to EU legislation on pollution - ***Very effective***
- Easier access to justice and other tools for civil society organizations to act against breaches to EU legislation on pollution - ***Very effective***
- Introducing heavier fines for breaches of pollution-related legislation - ***Very effective***
- Securing an overall better implementation of pollution-related legislation - ***Very effective***
- Modernizing existing EU law on pollution - ***Very effective***
- Additional EU law on pollution, e.g. on soil pollution - ***Very effective***
- Financial incentives to address pollution (e.g. taxes and subsidies favoring less-polluting activities by industry and consumers) - ***Very effective***
- Ensuring a more positive impact of the banking and insurance systems on pollution - ***Very effective***
- More research on pollution (e.g. to better understand sources and impacts of pollution, prevent and remediate it) - ***Very effective***
- Better monitoring of pollution levels - ***Very effective***
- Better anticipating how pollution may develop in the future (e.g. using modelling) - ***Very effective***
- Stepping up international action on pollution - ***Very effective***
- Enhancing cooperation between stakeholders - ***Very effective***
- Increasing awareness on pollution, e.g. funding for clean-up/remediation activities with citizen involvement - ***Very effective***
- Formal education: Integrating pollution-related issues more into education curricula, e.g. training activities on the interplay between pollution, climate change, and public health, on sustainable consumption of products and energy, on sustainable mobility - ***Very effective***
- Influencing behavioral change (e.g. through social media, culture, sports,...) to shift to a 'zero pollution mentality', by informing citizens more, e.g. on the interplay between pollution, climate change and public health, on sustainable consumption of products and energy, on sustainable mobility - ***Very effective***
- Social innovation (e.g. shifting from physical to digital solutions, changes in work organization) - ***Very effective***
- Other

If "other", please specify - ***All are very effective if implemented all together. Individually, options such as awareness raising don't deliver. Adopting and enforcing the right***

legislation cutting pollution at source bring bigger impacts. Decoupling the use of seas from pollution, harmonising legislation and applying the polluter pays principle is also v. effective.

If applicable, please specify in which area you would like to see new EU legislation on pollution -

On microplastics, sunscreens, containers 'lost' at sea and underwater noise. On the latter two, the commission should not wait for the discussions at the international level (IMO) to legislate on this issue. Prohibiting most polluting activities (drilling at sea) should also be a priority.

3.2. In your view, how much should the following groups contribute (financially and by actions) to reducing pollution, compared to the current situation?

- Product manufacturers - *Much more*
- Service providers - *Much more*
- Food producers (farmers, aquaculture producers, fisheries) - *Much more*
- Energy producers - *Much more*
- Consumers - *Somewhat more*
- Taxpayers via public funding - *Somewhat less*
- Others

3.3. In your view, which lessons could be learned for zero pollution policies from recent developments, such as changes observed during Covid-19 related measures (e.g. changes related to less commuting and traffic)?

- More can and should be done to reduce ambient air pollution in cities - *Completely agree*
 - More can and should be done to reduce noise pollution in cities - *Completely agree*
 - More can and should be done to reduce pollution from food (from farmer to consumer) - *Completely agree*
 - More can and should be done to reduce pollution from waste (from production to recycling/disposal) - *Completely agree*
 - More can and should be done to reduce pollution in our seas - *Completely agree*
 - More can and should be done to reduce the need for passenger and goods transport (e.g. adapting work organisation, more teleworking) - *Completely agree*
 - More can and should be done to incentivise active and clean mobility (e.g. walking and cycling) - *Completely agree*
 - More can and should be done to incentivise other alternatives to private car ownership, such as shared mobility solutions and public transport - *Completely agree*
 - Others: *More can and should be done to live better in harmony with nature including blue spaces.*
- More can and should be done to protect vulnerable and highly valuable habitats and ecosystems from pollution.*

3.4. In your view, what impacts should be the most decisive for implementation of pollution related policies?

- Human and animal health impacts - *Completely agree*
- Environmental impacts - *Completely agree*
- Economic impacts - *Somewhat agree*

- Social impacts - *Somewhat agree*
- Other : *Mental health given the many benefits of water : well-being, therapeutical & societal in terms of education, lifelong learning, active citizenship, anti-social behaviour reduction & physical activity. Watersports allow people to reconnect to and immerse in nature. A preserved environment brings the greatest benefits for human beings.*

PART 2: EXPERT SECTION

This part is dedicated to experts and specialized public. It includes two thematic sections which are cross-cutting in nature, namely the monitoring and digitalisation. Other thematic consultations have already taken place or are planned in the context of specific impact assessment or evaluation work (see introductory section). These dedicated consultations will also be considered in the zero pollution work. However, the focus here is on cross-cutting themes.

4. TOWARDS AN INTEGRATED ZERO POLLUTION MONITORING AND OUTLOOK FRAMEWORK

This section of the questionnaire seeks to gather views of experts on the development of a more integrated and holistic zero pollution monitoring and outlook framework. Monitoring can describe the levels and impacts of pollution now and in the past, including the analysis of trends. An outlook can identify potential changes and (new) developments in the future either in a quantitative manner (e.g. through modelling and scenarios) or in a qualitative manner (through foresight and horizon scanning).

This section is particularly suited for respondents who do have an in-depth knowledge of monitoring and assessing pollution in a policy context.

4.1. What is your opinion about the following statements?

- Existing pollution monitoring frameworks at EU and national level are sufficient - ***Completely disagree***
- Integrating (zero) pollution monitoring frameworks, such as on different pollutants or under different laws at EU level is an important initiative for the EU action plan - ***Completely agree***
- Developing an overarching 'Zero Pollution' monitoring framework at EU level is relevant for your own work - ***Completely agree***
- Communicating on health impacts from pollution at EU level needs to be improved - ***Completely agree***
- Communicating on environmental impacts from pollution at EU level needs to be improved - ***Completely agree***
- Communicating on socio-economic impacts related to pollution at EU level needs to be improved - ***Completely agree***
- Linkages of health data with pollution data need to be improved - ***Completely agree***
- Linkages of socio- economic data with pollution data need to be improved - ***Completely agree***

4.2. In your opinion, what should be the main purpose for a zero-pollution monitoring and outlook at EU level?

- Providing a guidance ('compass') for the Zero Pollution ambition towards 2050 for the purpose of policy making and communication - ***Somewhat agree***
- Being 'a driver for change' through better communication with and engagement of citizens - ***Somewhat agree***

- Showing implementation progress ('what is the distance to target?') and effectiveness ('have the past measures worked?') of existing EU policies and legislation - ***Completely agree***
- Monitoring progress towards benchmarks related to human health and well-being (e.g. on air or water pollution) and to planetary boundaries (e.g. on pollution from excess nutrients) - ***Completely agree***
- Assessing the total pollution load (exposure) as well as the main impacts of pollution on humans and on ecosystems - ***Completely agree***

4.3. In your opinion, which pollutants should be addressed as a priority at EU level and therefore included in the monitoring framework?

- Particulate matter in ambient air (PM10, PM2.5) - ***Completely agree***
- Other air pollutants (e.g. nitrogen dioxide, ozone, sulphur dioxide) - ***Completely agree***
- Excess nutrients (nitrogen and phosphorus) in air, water and soil - ***Completely agree***
- Heavy metals in air, water and soil - ***Completely agree***
- Pesticides / biocides - ***Completely agree***
- Pharmaceuticals and especially pharmaceutical substances representing a risk with respect to the development of antimicrobial resistances - ***Completely agree***
- Hydrocarbons including oil spills - ***Completely agree***
- Other industrial chemicals - ***Completely agree***
- Marine litter, including plastics - ***Completely agree***
- Microbiological and viral pollution - ***Completely agree***
- Noise - ***Completely agree***
- Other physical pollution not listed above :
- Other pollutants not listed above :

If "other physical pollution", please specify : ***Microplastics and Underwater noise pollution - Completely agree***

If "other pollutants", please specify : ***Harmful algal bloom and aquatic invasive species***

5. DIGITAL SOLUTIONS FOR ZERO POLLUTION

This section of the questionnaire seeks to gather views of experts on the digital tools and services (such as the use of artificial intelligence or blockchain) and how they can be used for achieving the zero-pollution ambition.

This section is particularly suited for respondents who do have an in-depth knowledge of digitization ideally applied in the context of pollution prevention, reduction and remediation.

5.1. What is your opinion about the following statements?

- Digital solutions offer a significant potential for reducing pollution - ***Somewhat agree***
- Digital solutions are already widely applied by businesses for reducing pollution - ***Somewhat agree***
- Administrations (in my country) are using digital tools to trace pollution and inform the public - ***Somewhat agree***

- Administrations (in my country) are using digital tools to implement EU pollution legislation and enforce rules on the ground - *I don't know*
- Significant investment is needed in innovation and digitalisation to help achieve the 'zero pollution ambition' - *Somewhat agree*
- Excessive data collection and storage risks contributing to pollution more than it reduces pollution - *Somewhat agree*

5.2. In your opinion, what are the areas of digital application with the biggest potential for pollution prevention, reduction and remediation?

- Data generation and monitoring of pollution (e.g. through remote sensing) - *Completely agree*
- Data transmission and management - *Somewhat agree*
- Data analytics and artificial intelligence - *Completely agree*
- Blockchain and distributed ledger technology - *Somewhat agree*
- Internet of things (IoT) - *Completely agree*
- Information about pollution for consumers and businesses (e.g. pollutants present in products through product passports) - *Completely agree*
- 3D printing or additive manufacturing - *Somewhat agree*
- Online platforms and cloud systems - *Somewhat agree*
- Digital twins and models - *Somewhat agree*
- Changing work organisation, shifting from physical to digital solutions (e.g. teleworking) - *Somewhat agree*

Can you give examples for digital solutions to reduce pollution in your area of work?

Surfrider Europe has developed several digital solutions to help reduce pollution, among them [Plastic Origins](#), a digital application to track plastic pollution across rivers. It is based on citizen sciences: anyone walking or practicing nautical activity along a river can use the app to report litter. The purpose is to quantify and identify plastic pollution in order to develop knowledge; the [Ocean's Zero](#) app, to help citizens reduce their impacts on the ocean in their daily life; the [Surfrider Ocean Campus](#) - an online educational platform with courses, quizzes and free educational kits to raise awareness and inform about ocean pollution issues and many other digital educational tools. Digital solutions would be welcomed to help us track containers content and losses, the transit of plastic pellets, detect overflows in waste treatment installations, inform users about the water quality of their bathing and recreational sites, inform the public about the impacts of the products they buy on the ocean, including those of their transportation over the world in container ships. Surfrider Europe also uses and promotes the use of mobile apps - namely the [Marine Litter Watch app](#) and the [Marine Debris app](#) - to report back and collect data on litter found during our [Ocean Initiatives](#) operations. Finally, Surfrider Europe was one of the partners of the [Life Lema Project](#) and contributed to the development of techniques and technologies to predict, detect, analyse and collect floating marine litter.

FURTHER COMMENTS

Do you have any other comments or any other issues that should be addressed in the context of the Zero Pollution Action Plan? Why?

Surfrider Europe has attached its position paper on the Commission's action plan to this question. It details its views on the consultation and the action plan, and develops its demands in each of its areas of expertise. You can find it on our website <https://surfrider.eu/en/>.

In this question, Surfrider Europe invites you to leave of your own comment to express yourself. Please feel free to raise any idea or local issue you feel would be of interest in the framework of the consultation and/or the action plan.

ABOUT SURFRIDER FOUNDATION EUROPE

SURFRIDER FOUNDATION EUROPE is a non-profit organisation whose purpose is to protect and showcase the importance of lakes, rivers, the ocean, waves, and coastlines. It currently has over 15,000 members and is active across 12 European countries through its volunteer-run branches. For 30 years, Surfrider Foundation Europe has been taking action in three areas of expertise: marine litter, water quality and public health, coastal management and climate change. For more information: surfrider.eu