

MAKING THE EU FIT FOR THE FUTURE:

What the German environmental associations want from the European Green Deal



POLLUTION

ZERO-POLLUTION AMBITION FOR A TOXIC-FREE ENVIRONMENT

The European Commission sees the European Green Deal (EGD), presented in December 2019, as a new growth strategy to help achieve the transition to a resource-efficient, competitive and sustainable economy. In the current Corona crisis, in addition to the already noticeable impacts of the combined climate and biodiversity crisis, the vulnerability of our economic, health and social model is becoming clearer than ever before. The political response must be to make our economic system more resilient. The pathway out of the combined health and economic crisis must remain within the planetary boundaries and must be guided by European and international solidarity. Although the EGD does not yet go far enough in many areas, it offers promising opportunities to help the European economy get back on its feet after the pandemic and at the same time to make the EU more resilient and sustainable.



ZERO-POLLUTION AMBITION FOR A TOXIC-FREE ENVIRONMENT



Synthetic pollutants represent a large and growing risk for humans and the environment. They accumulate in the air, water and soil, destroy ecosystems and have a lasting negative impact on our health. In recent years, studies and assessments of individual substance groups and risks have already clearly shown where action is urgently needed. Now is the time to act accordingly and to drastically reduce the pollution caused by such substances.

In the Green Deal, the EU Commission announced a **Zero Pollution Action Plan** as well as a **Chemicals Strategy for Sustainability** and a **review of EU measures to combat pollution from large industrial installations**. The signatory organisations call on the EU to present these strategies as soon as possible, to make them apply to all sectors, and to base them on prevention and sustainability. The Green Deal has the potential to put the well-being of people and our environment at the heart of EU policy. In particular, the protection of most vulnerable groups must be a top priority. The EU needs a systemic and future-proof chemicals policy in order to protect people and habitats effectively and to drastically reduce the pollution from harmful substances. Pollution of our air, water and soil from harmful substances is acute, and we cannot afford to put off measures to reduce this pollution any longer.

CHEMICALS STRATEGY FOR SUSTAINABILITY (AUTUMN 2020)

The signatory organisations call for the inclusion of the following items in the Strategy:

- ▶ The strategy must fill gaps in the legislation governing the use of chemicals and establish an overarching framework for dealing with hazardous substances.
- ▶ The European Commission must consistently apply the precautionary, sustainability and polluter-pays principles and ensure transparent decision-making processes.
- ▶ Individual substance assessments are to be replaced by group assessments to increase efficiency and to ensure that substances of concern are replaced by safe alternatives and not by substitutes from the same substance group.
- ▶ Substance risk assessments must be carried out by independent testing laboratories, paid for from a fund which is provided by industry and managed by an independent EU agency.
- ▶ The substitution of hazardous chemicals must be made mandatory as soon as alternatives are available. The development of alternatives to substances of concern must be encouraged by providing financial incentives and by integrating the principles of “green chemistry”.
- ▶ In order to support the goal of a clean circular economy and the proper disposal of toxic substances, full disclosure of the chemical composition of consumer goods should be made obligatory.
- ▶ The development of the European Chemicals Agency’s SCIP database on substances of concern in products should be supported and linked to other databases such as the AskREACH database.
- ▶ An action plan for the protection of vulnerable groups must be drawn up to reduce the risks to these groups from exposure.
- ▶ Groups of chemicals of concern must be restricted and substituted. These include PFAS, mercury, bisphenols and phthalates and other harmful chemicals used in consumer products such as toys, cosmetics, food contact materials, textiles, hygiene products, construction products and products used in childcare.
- ▶ The EU chemicals regulation REACH and other legislation on chemicals must be fully implemented. This means, among other things: efficient and comprehensive compliance checks on REACH registration dossiers,

stricter obligations on the correct use and updating of the dossiers, a clear application of the „no data, no market“ principle, and better implementation of REACH Art. 33 (reliable information for consumers).

- ▶ The Strategy must take into account the increased risk posed by mixtures of substances.
- ▶ The criteria for substances of very high concern (SVHC) should be extended to include persistent, mobile and toxic (PMT) and very persistent and very mobile (vPvM) substances. Endocrine disruptors should be included in the category of substances of very high concern (SVHC).
- ▶ The implementation of animal-free testing procedures must be stepped up.
- ▶ The EU must become a responsible global actor that neither exports nor imports chemicals or products whose use is banned in the EU. Within the framework of the international chemicals management process (SAICM Beyond 2020), the EU must work towards the conclusion of an ambitious agreement on the sustainable management of chemicals and waste worldwide.
- ▶ Exemptions from the EU POPs Regulation which allow the continued use of banned hazardous substances should be withdrawn.

ZERO POLLUTION ACTION PLAN FOR AIR, WATER AND SOIL (2021)

The organisations call for the following measures:

- ▶ The European Commission must present as soon as possible an action plan establishing clean air, water and soil as a cross-cutting objective for all sectors where pollution arises (such as transport [including shipping], industry and agriculture). Consistency with the objectives of climate and biodiversity protection must also be ensured.
- ▶ Under this action plan, the European Commission must press for an ambitious Gothenburg Protocol (UNECE Air Convention) that also covers methane, soot and mercury emissions. The resulting commitments must be implemented by means of established, available and cost-effective measures
- ▶ The proposed updating of EU air quality standards to reflect the latest WHO air quality guidelines, once these are published in 2021, must be implemented in any event, whether or not the action plan is adopted yet.
- ▶ In order to consistently follow the precautionary principle in the protection of surface and ground water, and thus of drinking water, the increasing input of trifluoroacetic acid (TFA), inter alia via refrigerants, must be taken into account through improved monitoring and the avoidance of precursor substances.

REVIEW OF EU MEASURES TO COMBAT POLLUTION FROM LARGE INDUSTRIAL INSTALLATIONS (2021)

The undersigned organisations call for the following measures:

- ▶ The EU Directive on industrial emissions should be revised to make it more ambitious. This includes extending its scope to include greenhouse gas emissions.
- ▶ Best available techniques (BAT) standards should be redefined and strengthened in order to minimise the negative environmental impact of the industrial activity in question. Priority should be given to energy production, water treatment and supply, resource management and the substitution of hazardous chemicals.

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This paper is one of a series of position papers on selected key aspects of the Green Deal. For papers on other topics, please see our homepage www.dnr.de.

