

Public consultation on the EU Action Plan “Towards a Zero Pollution Ambition for air, water and soil”

Fields marked with * are mandatory.

Introduction

The European Green Deal announced that to protect Europe’s citizens and ecosystems, the EU needs to move towards a zero pollution ambition, and better prevent and remedy pollution from air, water, soil, and consumer products. To address these interlinked challenges, in 2021 the Commission will adopt a Zero Pollution Action Plan.

Pollution causes multiple physical and mental diseases. In the EU, despite important improvements over the last decades, every year over 400 000 premature deaths (including from cancers) are attributed to ambient air pollution, and 48 000 cases of ischaemic heart disease as well as 6.5 million cases of chronic sleep disturbance to noise, next to other diseases attributable to both. Pollution’s most harmful health impacts are typically born by vulnerable citizens, notably children, people with certain medical conditions, the elderly and people living in socio-economic deprivation.

Pollution of air, water and soil is also one of the five main drivers of biodiversity loss and contributes largely to the current 6th species extinction. It comes at a high price for society and ecosystems, including health-related costs (healthcare, lost workdays, lost productivity), reduced yields (e.g. in agriculture, fisheries and tourism), remediation costs (e.g. water treatment, soil decontamination, marine depollution) and loss of ecosystem services (e.g. pollination). Pollution is also strongly interrelated with other environmental, social and economic risks for businesses and citizens.

The purpose of this open public consultation (OPC) is to gather the perception and views of Europeans on a range of issues that the Action Plan may address, including:

- How pollution affects citizens and the environment
- How well current policies address pollution
- What actions should be taken on pollution in the future
- How to monitor pollution in the future
- What potential there is for digital solutions to address pollution

The consultation is divided into three parts:

- Part I: The first part asks for some information about you (such as which country you come from).

- Part II: The second part is directed towards the general public. You do not need any specialist knowledge to reply to this.
- Part III: The third part (Expert section) is mainly directed towards specialists and interested experts and includes a set of questions on specific issues

Finally, there is an opportunity to share documents and provide complementary information, such as position papers, more detailed reports or studies on the issues mentioned, as well as examples, practical cases, etc

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Maria

* Surname

Karagiannidou-Rosiek

* Organisation name

255 character(s) maximum

IOGP

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

3954187491-70

* Email (this won't be published)

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon

- Canada
- Cape Verde
- Cayman Islands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland

- Grenada
- Guadeloupe

- Guam

- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Guyana

- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong

- Hungary

- Iceland

- India
- Indonesia
- Iran
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru

- Nepal

- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- Niger

- Nigeria
- Niue

- Norfolk Island
- Northern Mariana Islands
- North Korea

- North Macedonia
- Norway
- Oman
- Pakistan
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Syria

- Taiwan
- Tajikistan
- Tanzania
- Thailand

- The Gambia

- Timor-Leste
- Togo

- Tokelau
- Tonga

- Trinidad and Tobago
- Tunisia

- Turkey
- Turkmenistan
-

- ◉ Central African Republic
- ◉ Chad
- ◉ Chile
- ◉ China
- ◉ Christmas Island
- ◉ Clipperton
- ◉ Cocos (Keeling) Islands
- ◉ Colombia
- ◉ Comoros
- ◉ Congo
- ◉ Cook Islands
- ◉ Costa Rica
- ◉ Côte d'Ivoire
- ◉ Croatia
- ◉ Cuba
- ◉ Curaçao
- ◉ Cyprus
- ◉ Czechia
- ◉ Democratic Republic of the Congo
- ◉ Denmark
- ◉ Iraq
- ◉ Ireland
- ◉ Isle of Man
- ◉ Israel
- ◉ Italy
- ◉ Jamaica
- ◉ Japan
- ◉ Jersey
- ◉ Jordan
- ◉ Kazakhstan
- ◉ Kenya
- ◉ Kiribati
- ◉ Kosovo
- ◉ Kuwait
- ◉ Kyrgyzstan
- ◉ Laos
- ◉ Latvia
- ◉ Lebanon
- ◉ Lesotho
- ◉ Liberia
- ◉ Palau
- ◉ Palestine
- ◉ Panama
- ◉ Papua New Guinea
- ◉ Paraguay
- ◉ Peru
- ◉ Philippines
- ◉ Pitcairn Islands
- ◉ Poland
- ◉ Portugal
- ◉ Puerto Rico
- ◉ Qatar
- ◉ Réunion
- ◉ Romania
- ◉ Russia
- ◉ Rwanda
- ◉ Saint Barthélemy
- ◉ Saint Helena Ascension and Tristan da Cunha
- ◉ Saint Kitts and Nevis
- ◉ Saint Lucia
- Turks and Caicos Islands
- ◉ Tuvalu
- ◉ Uganda
- ◉ Ukraine
- ◉ United Arab Emirates
- ◉ United Kingdom
- ◉ United States
- ◉ United States Minor Outlying Islands
- ◉ Uruguay
- ◉ US Virgin Islands
- ◉ Uzbekistan
- ◉ Vanuatu
- ◉ Vatican City
- ◉ Venezuela
- ◉ Vietnam
- ◉ Wallis and Futuna
- ◉ Western Sahara
- ◉ Yemen
- ◉ Zambia
- ◉ Zimbabwe

* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your contribution, country of origin and the respondent type profile that you selected will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

Part II

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?

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
* Current levels of pollution have a negative impact on my health or the health of those immediately around me	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Pollution has negative impacts on the wellbeing of the population in specific locations in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Current levels of pollution have negative impacts on the health of the overall population in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Currently, pollution has negative impacts on the environment and particularly biodiversity in my immediate surroundings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Currently, pollution has general negative impacts on the environment and particularly biodiversity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Current levels of pollution have general negative impacts on the economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
* Pollution is an issue of concern worldwide	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Pollution is an issue of concern in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Pollution is an issue of concern primarily outside of the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Pollution is an issue of concern in my country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Pollution is an issue of concern in my municipality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* I feel sufficiently informed about pollution where I live	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* I feel sufficiently informed about health consequences of pollution where I live	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Pollution has been reduced in the last decade where I live	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
* People living in cities are more exposed to pollution than in rural areas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* People living in rural areas are the most exposed to pollution than in urban areas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* People living in poverty/at risk of poverty are the more exposed to pollution than others	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Everyone in our society is equally exposed to pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Children and the elderly suffer more from pollution than others	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other please specify

300 character(s) maximum

The impact of pollution on different population groups is pollutant specific and site specific.

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

	Very well informed	Moderately informed	Not well informed	Not at all informed	No opinion
* EU Clean Air policies such as the Ambient Air Quality Directives and the National Emission reduction Commitments (NEC) Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU Soil policies such as the Soil Thematic Strategy or the Sewage Sludge Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU Noise policies such as the Environmental Noise Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU policies on industrial emissions, notably the Industrial Emissions Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU policies on chemicals, such as the REACH Regulation and regulation on pesticides	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Farm to Fork Strategy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Biodiversity Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU policies limiting air pollution at source, such as Euro standards for cars, buses and trucks, or eco-design rules for heating appliances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* EU policies addressing pollution from waste, such as from persistent organic pollutants (POPs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Other EU policies on pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other please specify

300 character(s) maximum

IOGP is following all key legislation relevant for the oil and gas industry.

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?

	Very important	Important	Neither important nor unimportant	Not a priority	Irrelevant	I don't know
* Ambient air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Indoor air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Pollution of rivers, lakes and ground water	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Marine pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Soil and sediment pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Noise pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other types of pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	Highly polluting	Somewhat polluting	No significant impact	Somewhat helps reducing pollution	Very much helps reducing pollution	I don't know
* Agriculture: animal farming	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Agriculture: crop production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Fisheries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Mining and extraction of raw materials	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Industrial production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Road transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Rail transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Shipping	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Air transport	<input type="radio"/>	<input checked="" type="radio"/>				
Waste landfilling	<input type="radio"/>	<input checked="" type="radio"/>				
* Waste incineration	<input type="radio"/>	<input checked="" type="radio"/>				
* Waste recycling	<input type="radio"/>	<input checked="" type="radio"/>				
* Energy production from fossil fuels	<input type="radio"/>	<input checked="" type="radio"/>				
* Energy production from biomass	<input type="radio"/>	<input checked="" type="radio"/>				
* Wind and solar energy production	<input type="radio"/>	<input checked="" type="radio"/>				
* Accidental release of hazardous substances	<input type="radio"/>	<input checked="" type="radio"/>				
* Littering	<input type="radio"/>	<input checked="" type="radio"/>				
* Heating and cooling buildings	<input type="radio"/>	<input checked="" type="radio"/>				
* Other	<input type="radio"/>	<input checked="" type="radio"/>				

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

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
* My consumption habits contribute to environmental pollution in my immediate surroundings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* My consumption habits contribute to environmental pollution in my country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* My consumption habits contribute to environmental pollution in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* My consumption habits contribute to environmental pollution globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	EU level authorities	National level authorities	Regional level authorities	Local authorities	I don't know
* Overall, the most appropriate level of government to address pollution is...	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* The most appropriate level of government to address ambient air pollution is...	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* The most appropriate level of government to address pollution of rivers, lakes and ground water is...	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* The most appropriate level of government to address marine pollution is...	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* The most appropriate level of government to address soil and sediment pollution is...	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* The most appropriate level of government to address noise pollution is...	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

	Doing too much	Doing enough	Not doing enough	I don't know
* Product manufacturers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Service providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Food producers (farmers, aquaculture producers, fisheries)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Energy producers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Banks and investors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Your local or regional government	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Your national government	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The European Union	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* International organisations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Social partners	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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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?

	Very effective	Somewhat effective	Neither effective nor ineffective	Somewhat ineffective	Completely ineffective	I don't know
* Greater powers to national authorities to sanction breaches to EU legislation on pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Easier access to justice and other tools for civil society organisations to act against breaches to EU legislation on pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Introducing heavier fines for breaches of pollution-related legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Securing an overall better implementation of pollution-related legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Modernising existing EU law on pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Additional EU law on pollution, e.g. on soil pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Financial incentives to address pollution (e.g. taxes and subsidies favouring less-polluting activities by industry and consumers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring a more positive impact of the banking and insurance systems on pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* More research on pollution (e.g. to better understand sources and impacts of pollution, prevent and remediate it)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Better monitoring of pollution levels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Better anticipating how pollution may develop in the future (e.g. using modelling)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Stepping up international action on pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Enhancing cooperation between stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Increasing awareness on pollution, e.g. funding for clean-up/remediation activities with citizen involvement	<input type="radio"/>	<input checked="" type="radio"/>				
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	<input type="radio"/>	<input checked="" type="radio"/>				
* Influencing behavioural 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	<input type="radio"/>	<input checked="" type="radio"/>				
* Social innovation (e.g. shifting from physical to digital solutions, changes in work organisation)	<input type="radio"/>	<input checked="" type="radio"/>				
* Other	<input type="radio"/>	<input checked="" type="radio"/>				

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

	Much more	Somewhat more	Same as currently	Somewhat less	Much less	I don't know
* Product manufacturers	<input type="radio"/>	<input checked="" type="radio"/>				
* Service providers	<input type="radio"/>	<input checked="" type="radio"/>				
* Food producers (farmers, aquaculture producers, fisheries)	<input type="radio"/>	<input checked="" type="radio"/>				
* Energy producers	<input type="radio"/>	<input checked="" type="radio"/>				
* Consumers	<input type="radio"/>	<input checked="" type="radio"/>				
* Taxpayers via public funding	<input type="radio"/>	<input checked="" type="radio"/>				
* Other	<input type="radio"/>	<input checked="" type="radio"/>				

If other please specify

300 character(s) maximum

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)?

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
* More can and should be done to reduce ambient air pollution in cities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More can and should be done to reduce noise pollution in cities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More can and should be done to reduce pollution from food (from farmer to consumer)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More can and should be done to reduce pollution from waste (from production to recycling/disposal)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More can and should be done to reduce pollution in our seas	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* More can and should be done to reduce the need for passenger and goods transport (e.g. adapting work organisation, more teleworking)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More can and should be done to incentivise active and clean mobility (e.g. walking and cycling)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More can and should be done to incentivise other alternatives to private car ownership, such as shared mobility solutions and public transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know
* Human and animal health impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Environmental impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Economic impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Social impacts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Part III: Expert section

This part is dedicated to experts and specialised 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?

	Completely agree	Somewhat agree	Neither disagree nor agree	Somewhat disagree	Completely disagree	I don't know
Existing pollution monitoring frameworks at EU and national level are sufficient.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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 .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing an overarching 'Zero Pollution' monitoring framework at EU level is relevant for your own work .	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communicating on health impacts from pollution at EU level needs to be improved.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communicating on environmental impacts from pollution at EU level needs to be improved.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communicating on socio-economic impacts related to pollution at EU level needs to be improved	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Linkages of health data with pollution data need to be improved	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Linkages of socio-economic data with pollution data need to be improved	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Somewhat agree	Neither disagree nor agree	Somewhat disagree	Completely disagree	I don't know
Providing a guidance ('compass') for the Zero Pollution ambition towards 2050 for the purpose of policy making and communication	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Being 'a driver for change' through better communication with and engagement of citizens	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Showing implementation progress ('what is the distance to target?') and effectiveness ('have the past measures worked?') of existing EU policies and legislation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assessing the total pollution load (exposure) as well as the main impacts of pollution on humans and on ecosystems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Completely agree	Somewhat agree	Neither disagree nor agree	Somewhat disagree	Completely disagree	I don't know
Particulate matter in ambient air (PM10, PM2.5)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other air pollutants (e.g. nitrogen dioxide, ozone, sulphur dioxide)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Excess nutrients (nitrogen and phosphorus) in air, water and soil	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heavy metals in air, water and soil	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pesticides / biocides	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pharmaceuticals and especially pharmaceutical substances representing a risk with respect to the development of antimicrobial resistances	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydrocarbons including oil spills	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other industrial chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine litter, including plastics	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Microbiological and viral pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other physical pollution not listed above	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other pollutants not listed above	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other physical pollution, please specify

100 character(s) maximum

If other pollutants, please specify

100 character(s) maximum

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 digitisation ideally applied in the context of pollution prevention, reduction and remediation.

5.1 What is your opinion about the following statements?

	Completely agree	Somewhat agree	Neither disagree nor agree	Somewhat disagree	Completely disagree	I don't know
Digital solutions offer a significant potential for reducing pollution.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital solutions are already widely applied by businesses for reducing pollution.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrations (in my country) are using digital tools to trace pollution and inform the public.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrations (in my country) are using digital tools to implement EU pollution legislation and enforce rules on the ground.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Significant investment is needed in innovation and digitalisation to help achieve the 'zero pollution ambition'	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Excessive data collection and storage risks contributing to pollution more than it reduces pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

	Completely agree	Somewhat agree	Neither disagree nor agree	Somewhat disagree	Completely disagree	I don't know
Data generation and monitoring of pollution (e.g. through remote sensing)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data transmission and management	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data analytics and artificial intelligence	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Blockchain and distributed ledger technology	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internet of things (IoT)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information about pollution for consumers and businesses (e.g. pollutants present in products through product passports)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3D printing or additive manufacturing	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Online platforms and cloud systems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital twins and models	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changing work organisation, shifting from physical to digital solutions (e.g. teleworking)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

2000 character(s) maximum

We would like to mention few examples from the oil and gas industry:

- Infrared detection for gas leaks
- Leak Detection and Repair (LDAR): fugitive emissions control
- Produced water and discharge models

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?

2000 character(s) maximum

You may upload a document adding additional relevant observations. Please keep the contents short and focused on the subject of the consultation.

Please note that the uploaded document will be published in its entirety.

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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Contact

ENV-ZERO-POLLUTION@ec.europa.eu

IOGP input to the consultation on the EU Action Plan “Towards a Zero Pollution Ambition for air, water and soil”

Introduction

The International Association of Oil & Gas Producers’ (IOGP) member companies account for approximately 90% of the oil and gas produced in Europe. IOGP shares the world’s ambition to reach the Paris Agreement’s goals and supports the EU’s objective of climate neutrality by 2050 upon the implementation of enabling measures.

IOGP supports the overall strategic direction enshrined in the EU Action Plan Towards a Zero Pollution Ambition for air, water and soil to reduce the environmental footprint of our societal activities while caring for European citizen’s well-being and restoring biodiversity.

It is understood that, in the “zero pollution” approach, “pollution” means actual harm to human health or the quality of the environment (e.g. as in Directive 2010/75/EU, Article 3 §2), and conversely “zero pollution” does not equate to an unrealistic “zero emission” objective.

This approach takes into account the societal needs and therefore will generate a high level of acceptance by a wide community of stakeholders.

We would also like to emphasize that Industry should neither be seen nor presented as antagonistic to EU citizen’s wellbeing. Quite the opposite in fact, industry brings essential goods to the EU society. The current COVID crisis – for instance – has illustrated the needs for a strong, efficient EU chemical and pharmaceutical industry.

Better results will only be achieved with a realistic, science and risk-based approach. A solid regulatory framework for industrial activities is already established on the EU level. It is essential for the success of the initiative to get all the stakeholders involved.

To achieve further pollution reduction, we would recommend as general principles to:

- Strengthen the implementation, enforcement, and harmonization among Member States of the existing EU legislation.
- Conduct thorough impact assessments on all the legislative and non-legislative future proposals.
- Ensure stable and predictable regulatory framework that is necessary for long-term investments.

We appreciate the opportunity to respond to the Commission’s consultation on Zero Pollution Ambition. We would like to highlight that we responded to the multiple-choice questionnaire as an association representing the oil and gas (O&G) exploration and production (E&P) sector at the EU level, from now on referred as Oil & Gas industry. This means that questions related to individual, local, regional and national levels were not addressed as well as questions asking for statements on other sectors.

Moreover, we would like to make further clarifications regarding our answers to the questionnaire:

Part II – General awareness of pollution and related policies

Note: As aforementioned, IOGP represents the Oil & Gas industry, and is only in capacity to answer questions relevant for the sector on the EU level, therefore the answers in this section '*I don't know*' should be viewed as '*Not applicable*', which the IOGP cannot address.

1. General awareness of pollution and related policies

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

IOGP position is "Neither agree nor disagree", because impact of pollution depends on the type and amount of specific pollutant, site specification and sensitivity of the receptors and geographical location.

2. Views on the state of pollution and related policies

2.1 How important is it to address the following pathways and depositories of pollution at the EU level?

IOGP: The EU has already established a solid regulatory framework addressing pollution and the evaluation of the IED confirmed its efficiency.

We strongly believe that a full application of the existing set of rules and legislation in all EU member states would guarantee a successful reduction of pollution all over the EU. We would recommend focus on:

- Improved implementation and execution of the EU environmental legislation.
- Harmonization of enforcement of the EU legislation across all EU Member States.
- Qualifications of national and regional authorities, supervisory bodies and independent environmental inspectors.
- Principle of subsidiarity.

For an extension of the European legislative framework to address more aspects of soil and sediment protection, we could only see a very limited value for the society. The majority of EU member states has shown that these topics could be better addressed on a national or regional level, supported by qualified authorities.

Moreover, in light of the current economic and social situation, IOGP would like to insist on the importance for the Commission to conduct a thorough impact assessment on all ZPA initiatives, including the non-legislative ones, in line with the Better Regulation principle.

Marine pollution

IOGP: All EU seas are regulated under the umbrella of Regional Sea Conventions (Oslo Paris Convention-OSPAR, Barcelona Convention, Helsinki Convention-HELCOM, and Bucharest Convention).

All these frameworks include non-EU members as well and have shown for decades (examples: OSPAR, HELCOM) their ability to align all state government views with society needs, environmental aspects and various stakeholder interests in the marine areas.

IOGP believes that addressing the transboundary effects of marine pollution through the RSC has much better effectiveness rather than through EU specific actions. This allows addressing the issues taking into account regional specificities and also address pollution issues from European, but non EU, countries and other surrounding states of regional seas outside of Europe.

Sharing best practices and transfer of knowledge can always be useful among these organizations. The EU can be a key actor and has the potential to take over the leadership to improve coordination of actions as EU has representation at these conventions.

Soil and sediment pollution

IOGP: Soil protection is already addressed in the EU under a number of provisions in EU policy instruments (IED, Biodiversity (Habitats & Birds), Environmental Impact, Forest, Land Use Land Cover). There is no justification for relaunching the discussions on a soil legislation and creating administrative burdens for both industry and the Commission with no additional environmental benefits as and when tackling soil pollution issue is more easily, more effectively and better addressed on national or regional level. Any future initiative to introduce an EU legal framework for soil should be avoided in view of the principle of subsidiarity.

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

Mining and extraction of raw materials

IOGP answer refers to oil and gas exploration and production activities only. We believe that E&P activities have no significant impact in comparison to other sectors and similar operations in other parts of the world¹. A robust regulatory framework, supported by several sector guidelines and regional specific regulations is already established to ensure safe operations, to prevent significant environmental impacts at all phases of operations. Moreover, the industry is continuously aiming to reduce its environmental footprint.

IOGP members commit to adopt and implement the highest operational standards. Whereas IOGP develops international standards and best practice guidelines for the E&P sector. Examples such as below could be viewed on [IOGP website](#):

- Environmental management in the upstream oil and gas industry
- Risk Based Assessment of Offshore Produced Water Discharges
- Key principles for the protection, care and rehabilitation of oiled wildlife
- Application of Remote Sensing Technologies for Environmental Monitoring, Guidelines on Implementing Spill Impact Mitigation Assessment (SIMA)
- Oil spill monitoring and sampling: Good practice guidelines for incident management and emergency response personnel

Accidental release of hazardous substances

IOGP choose not to respond to this question (answer I don't know), as this very much depends on the conditions of the release.

An accidental release of hazardous substances may have a significant impact for the specific site or community, but it highly depends on properties and amount of the released substance(s), its ease to recover, specifics of location, speed and efficacy of response actions, expertise and availability of resources for limitation of impacts. Therefore, depending on the type of accidental release of hazardous substance it could either cause harm to the surrounding environment of the release site or have no significant impact. The EU should consider that in terms of the goal for reduction of pollution these unwanted events have a very limited environmental pollution footprint compared to emissions during regular operations.

We also strongly believe that existing legislation effectively prevents accidental releases of hazardous substances².

There are several legislative driven, mandatory as well as voluntary, company-internal and sector- specific reporting requirements in place for IOGP member companies to prevent against unintentional releases of hazardous substances and to respond, report and monitor the environmental impacts in the rare cases of their occurrence.

In our view existing European regulations process safety are the appropriate tools to control and monitor accidental releases of hazardous substances

¹ Based on data from: IOGP Environmental performance indicators – 2019 data: <https://www.iogp.org/bookstore/product-category/data-series/environmental-performance/>
OSPAR Discharges, Spills and Emissions from Offshore Oil and Gas Installations in 2018: <https://www.ospar.org/documents?v=43785>

² Based on data from: OSPAR Discharges, Spills and Emissions from Offshore Oil and Gas Installations in 2018: <https://www.ospar.org/documents?v=43785>

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

Energy producers

IOGP views 'energy producers' as a very broad category. The Oil & Gas industry in Europe is making a substantial contribution to reduce pollution and promote new technologies and products that decrease the pollution further while enabling the energy transition, such as: LNG and Hydrogen fuel, Carbon Capture and Storage and Utilisation (CCUS), Hydrogen production on large scale and aims to implement energy efficiency measure in Oil & Gas installations. As leading example, IOGP supports the development of standards, guidelines and, where appropriate, cost-effective and efficient regulation addressing methane emissions along the full energy (gas and oil, coal and biogas/biomethane) chain.

In particular, the Oil & Gas industry has been an early mover on methane mitigation. The Oil & Gas sector has been involved in numerous initiatives, as specified on IOGP website:

- the development of the UNEP [Oil & Gas Methane Partnership](#) (OGMP) reporting framework referenced in the Strategy
- several voluntary Leak Detection and Repair (LDAR) programmes
- the Oil & Gas Climate Initiative's [collective target](#)
- the Global Gas Flaring Reduction Partnership "[Zero Routine Flaring by 2030](#)" initiative under the World Bank
- the [Methane Guiding Principles](#) which brings together best practices from the entire value chain and proactively disseminates them through trainings and masterclasses
- [Guidelines for Methane Emissions target setting](#) analyses the state of play on GHG emissions reduction targets making use of a questionnaire circulated among GIE, IOGP and MARCOGAZ's member companies. It gives some insights on the key elements that need to be considered when setting a target, as well as the guidelines to be followed by companies across the value chain, willing to implement emissions reduction targets.
- [Methane Management in the Upstream Oil and Gas Industry: Policy recommendations in the context of the EU Methane Strategy](#)

IOGP has also been an early and full supporter of the new holistic EU Strategy to Reduce Methane Emissions (the "EU Methane Strategy") promoted by the EU Commission and looks forward to contributing to its implementation. We support the development of cost-effective and efficient regulation to address methane emissions across all involved sectors of the economy in the EU and we have been leading and a number of voluntary, large-scale industry initiatives on methane reduction that are delivering measurable results.

3. Ways forward to address pollution

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

IOGP: national or regional authorities already can have the power to sanction.

Easier access to justice and other tools for civil society organisations to act against breaches to EU legislation on pollution

IOGP: Involvement of civil society organisations is already well established and functioning on national level. Civil society organizations already have the power to denounce breaches to legislation on pollution within member states.

Modernising existing EU law on pollution

IOGP: We believe that stable, coherent and predictable regulatory is of paramount if not the most important for any medium and long-term investment.

Frequent changes of rules with limited consideration of long investment cycles in the industry and lack of predictability can only discourage investment and prove counterproductive. Some regulations are still at their implementation phase (i.e. LCP BREF) and no concrete conclusions can be drawn yet on their effectiveness.

We would also recommend an objective, science-based, and target-based legislation, rather than a detailed, prescriptive legislation. That would give the most flexibility to the operators to comply, enable using the latest technologies and therefore be the most efficient.

Better monitoring of pollution levels

IOGP: IOGP and its member companies fully support that decisions and regulations have to be based on robust and transparent data that is grounded in science.

Better monitoring does not necessarily mean more monitoring, with results more widely made available.

Better monitoring is identifying what needs to be monitored, having the competency to treat the data, interpret and act upon it.

For the Oil & Gas industry the term “better monitoring” is not seen as requirement for generation of more data, but to improve the quality of data and their evaluation.

Better anticipating how pollution may develop in the future (e.g. using modelling)

IOGP: Techniques to anticipate how pollution may develop or spread, e.g. modelling, can be used as a tool, but are only complementary and do not replace pollution reduction measures. All models also have limitations that need to be accounted for.

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

IOGP: Please refer to response in question 2.5.

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 pollution in our seas

IOGP: Please refer to response in question 2.1 regarding marine pollution.

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

IOGP: We consider that all these impacts combined are the most decisive for implementation of pollution related policies. Cross-media effect should be avoided.

PART III – Expert section

4. Towards an integrated zero pollution monitoring and outlook framework

IOGP believes that the EU should clearly explain to all stakeholders including citizens and civil society that ‘zero’ pollution cannot and should not mean zero emissions. As noted, the concept of “zero emissions” would imply zero/no industrial activity at all, which is clearly impossible since it could lead to an economic collapse of disastrous proportions at the EU level and a mere transfer of the activities to other regions of the world, which have less stringent regulations. On the other hand, IOGP promotes and contributes enhanced efforts to further reduce emissions, taking into account the need to preserve industrial activity in the continent, but also to create new employment opportunities.

In this sense, the European Oil & Gas industry has already reduced its footprint in a significant way (the industry footprint as such is becoming more and more irrelevant) through investments and technology development. IOGP therefore believes that what needs to be achieved is to focus on the actual impacts of the activities and to target the additional measures to the emissions that have significant detrimental environmental impacts. In this way, our sector will be able to provide a cost-efficient contribution to the EU global climate commitment, ensuring a socially fair and just transition from today up to the 2050 target.

4.1 What is your opinion about the following statements?

Existing pollution monitoring frameworks at EU and national level are sufficient.

We can completely agree that the existing EU legislation is sufficient, but we are not certain to what degree this legislation is effectively implemented and harmonized in all EU Member States.

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.

IOGP: A robust framework already exists that does not need to be integrated but needs to be harmonized and implementation needs to be generalized. Our impression is that lots of efforts has been made over the last decade to avoid duplication, conflicting and misleading regulations.

Communicating on health impacts from pollution at EU level needs to be improved.

IOGP: Communication could be only improved taking into account the level of education and capacity for correct interpretation of the presented data. Moreover, we believe that this is the EU's role to also combat existing misinformation around industrial activities.

Linkages of health data with pollution data need to be improved

IOGP: Linkages can be improved on facts and science-based data on that topic.

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

All the mentioned pollutants are important and should be taken into account. However, majority of them is already covered within existing regulatory frameworks. IOGP would like to emphasize that rational approach should guarantee the most suitable solution, especially when incorporating the risk-based management measures. Moreover, we would like to highlight the importance of benchmarks and geographical location.

5. Digital solutions for zero pollution

We would like to note that digital solutions are only tools to prevent, monitor and detect pollution, however they do not provide a solution to remediate pollution.

In previous years already substantial investments have been made in digital solutions that are now already widely used by majority of large oil and gas companies in their day-to-day operations.

We would also like to highlight that overdependence on digital solutions may also increase risks of cyber threats and data protection. These risks should be appropriately addressed.

However, even though digital solutions represent only tools and not solutions per se, IOGP strongly encourages the development of all innovative solutions aimed at effectively tackling pollution.

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