

The Stockholm University Baltic Sea Centre's comments on the European Commission's EU Action Plan "Towards a Zero Pollution Ambition for air, water and soil"

This is an additional reply to the [consultation questionnaire](#): Do you have any other comments or any other issues that should be addressed in the context of the Zero Pollution Action Plan? Why?

- Monitoring should be better designed to enable evaluation of effectiveness of specific measures and temporal trends in emissions of hazardous substances and environmental levels. Currently compiled data under e.g. WFD, MSFD, IED/E-PRTR etc. are not appropriate for this evaluation due to differences in monitoring and reporting approaches between nations and also over time.
- Monitoring should include chemicals of emerging concern and unknown chemicals. This means that monitoring should have a broader scope than single known chemicals, i.e. that captures both known and unknown substances, and their combined effects. For example, non-target/suspect screening and effect-based monitoring methods could be developed for this purpose. Note that the fitness check of water legislation from 2019, and the European Parliament's resolution on the same in 2020, both highlight the need to develop effect-based monitoring of chemical substances. With no obligations to perform mixture risk assessments or to group substances when developing quality standards, there is room for improvement in the WFD, which also was acknowledged in the fitness check.
- Monitoring of chemicals in urban wastewater is lacking. Current legal incentives to obtain this information are weak. With the UWWTD up for likely revision, an important part of the zero pollution action plan would be to investigate the importance of wastewater as a transport pathway for chemicals from the technosphere to the aquatic environment.
- Seas and coastal areas are negatively affected by excess nutrients, resulting in e.g. increased algal blooms, regime shifts and lower fish productivity. It also has negative social and health impacts. Eutrophication is a priority area in marine environmental work but more can be done to mitigate these negative effects. We highlight the importance of minimizing diffuse pollution of nutrients such as nitrogen and phosphorous from all sources and their transport to fresh- and marine waters.

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