



### **Input to the Report “Towards a Pollution Free Planet”**

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We commend UNEP for this comprehensive and relevant report. We believe that many relevant issues, environmental, social and economic, managed to be reflected in the report. However, there are some issues that could have gone deeper and others that could have also been highlighted, such as electromagnetic pollution which strangely is never addressed by the UN, Institutions nor governments. We feel the report was relatively timid in naming specific polluting industries and can still go beyond.

We feel the report lacks a deeper analysis of the feminization of pollution, and how it impacts differently on poor and indigenous peoples. For instance, worldwide figures from women's illnesses and death from indoor pollution from burning firewood for cooking, are staggering and deserves to be specifically examined in the report. Perhaps even a box would help readers understand the urgency of the matter.

The report managed to touch upon the different kinds of pollution but gives too much emphasis to air pollution and does not even mention other forms of pollution such as electromagnetic contamination, and surprisingly, despite mentioning pesticides, it does not go further on the different forms of **food pollution** caused by agri-chemicals, hormones, antibiotics, preservatives, plastic packaging, etc. In this respect, the report could have gone into further detail into the gendered impacts (i.e. endocrine disruptors). For instance, increasingly, studies show the harmful effects from glyphosate linked to some types of cancer but the report fails to recognize it. It would seem that this is common knowledge only among certain circles but still to reach the general public (consumer) who ignores what their food has been sprayed with. The report is on point to mention the difficulties with access to information and the challenges to actually have the companies transparently report about this, hence UN Agencies such as UNEP, FAO or WHO should be delving into this issue more and bring to light relevant information; food labeling appears in the report as an important step but it fails to give a more comprehensive explanation of why it is truly fundamental and the necessary steps to make governments (and the general public) realize this is necessary.

- We welcome recognition that low- and middle-income countries bear the brunt of environment-related illnesses, with a disproportionate impact on children. Women in pregnancy and women as care takers of ill and children adds burden. Perhaps an additional box featuring an example would help the reader understand the concept.

- It would seem that some forms of pollution are still 'taboo'. The report should have mentioned health impacts from electromagnetic radiation, as well as from nuclear radiation; given the worrying situation in Fukushima and its impacts on the food chain, among others, it is highly relevant for this report, for UNEA-3 and beyond. There are already studies showing the very terrible impacts on fish stocks from the continued leakage in Fukushima's nuclear reactors, situation that hasn't received a solution which is urgently required. No sense of urgency has been officially recognized except for some alternative media and UNE/UNEA-3 can work on this.

- Issues on genetic pollution are also still timidly addressed. LMOs/GMOs are granted a 'precautionary principle' under the Convention on Biological Diversity (CBD) given that, among others, the long-term effects of GMOs inter-crossing with wild populations are still unknown. Besides, results from a 2012 study by the French University of Caen<sup>1</sup> associated appearing tumors in rats that had been fed with GM maize treated with RoundUp; there is quite some controversy around this paper still today and many still believe that the strong influence of the GM industry managed to discredit the paper. In UNE's report, a single mention to LMOs only in the context of the Cartagena protocol appears throughout the document. More importantly, we are still concerned about last UNEA-2 'women in science award' given to someone with presence in the GMO industry lobby in South Africa and the US. We then call for UNE(P) to have greater transparency in this specific issue. By not mentioning such pressuring issues, some industries could result benefited at the expense of people's health and the environment.

- The link to human and ecosystems health is well explained but it also failed to address pollution and its relation to disabilities.

- Another emerging but highly important issue concerns 'environmental racism,' referred to locating different projects causing significant environmental effects in poor and marginalized neighborhoods, often where minorities live. For example, in the US it is usually hispanic or black neighborhoods where polluting intensive projects are located thus these populations are the bearers of higher rates of asthma countrywide<sup>2</sup>.

- We also caution against the notion of automatically reducing pollution when moving to a 'green' economy using the same logic of the 'brown' economy; some forms of perceived 'clean' or 'green' energy, for example, can have even greater effects in the environment and on people's health. One such, case is wood-based bioenergy classified by some governments and industries as a 'renewable' (thus a clean) form of energy. However, biomass power stations are particularly inefficient and CO2 smokestack emissions tend to be around 50%

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<sup>1</sup> <https://enveurope.springeropen.com/articles/10.1186/s12302-014-0014-5>

<sup>2</sup> <https://www.theguardian.com/us-news/2015/mar/09/fresh-direct-south-bronx-clean-air-environmental-racism>

higher per unit of electricity produced than those from coal burning.<sup>3</sup> Furthermore, emissions from burning facilities have proven to have detrimental health effects in neighboring communities; biomass incinerators require constant fuel inputs and the resulting pollutants cause disease, pain and suffering and increase health care costs. According to figures from the US Environmental Protection Agency, even burning ‘clean’ — i.e. not chemically treated—wood emits 79 different pollutants; some of these are linked to respiratory and heart disease, others to cancer, birth defects and other health problems.<sup>4</sup>

- Despite the report mentioning a need for system transformation, the scope given here does not go beyond ‘business as usual’ and limits ‘transformation’ only to some aspects of production and consumption that do not garner the necessary steps in order to reach ‘a pollution free planet’. In fact, interestingly, throughout the report, pollution is addressed as something that needs to be ‘reduced’. Real transformation would mean a complete shift towards ‘a planet free from all forms of pollution’; it seems that the report is too permissive in maintaining certain forms of pollution and accept that some of them are ‘inevitable’<sup>5</sup>; for instance, the reference to contamination from oil spills<sup>6</sup> seems too lenient despite the fact that the same report also makes it clear that pollution is man-made and that it is our responsibility to address ALL the root causes.

- Despite the important focus made in the report towards consumer awareness/responsibility<sup>7</sup>, the way that natural resources use is addressed doesn’t emphasize enough the fact that it is not only about finding technological fixes to pollution but also the urgent need to reduce consumption of manufactured products, water, energy, etc. In the case of water pollution, is not just about increasing waste water treatment but committing to cleaner practices, saving water, harvesting rainwater (even in urban contexts), and overall, shifting to cleaner products and changing the mindset of our relationship to perceived ‘renewable’<sup>8</sup> resources. At the same time, we believe that sound technologies as well as traditional knowledge could have an important role in achieving greater awareness and cleaner lifestyles.

- We welcome reference to transboundary haze from forest and peat land fires in South-East Asia, and a full sub-section on pollution from deforestation would help the report to provide a more solid basis to governments in this aspect. At the same time, reforestation with native trees to curb pollution in both rural and urban areas, needs to have a more prominent role in the report, as well as real (native) forests protection in legislation as an important way to curb (air) pollution while discouraging industrial monoculture tree plantations.

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<sup>3</sup> <http://massenvironmentalenergy.org/docs/MEEA%20biomass%20briefing%20October%20update.pdf>

<sup>4</sup> Ibid 1.

<sup>5</sup> Some pollutants do not have substitutes or alternatives, and others are too pervasive

<sup>6</sup> Oil spills are responsible for only 12 per cent of the oil in the ocean. However, oil spills can have locally devastating impacts on the environment, and on communities that rely on marine resources for their livelihoods.

<sup>7</sup> from report: Lifestyles are driving this through consumption patterns (food waste, meat consumption, packaged foods), and so do agricultural subsidies which lead to less diversity and more monocultures, reducing consumer and traditional communities’ choices for pursuing healthy food.

<sup>8</sup> The notion of resources being ‘renewable’ assumes that they are infinite and can be used without regard.

- Although we agree that strengthening cooperation and partnerships on knowledge, technology, finance and investments, we caution against excessive attention to public-private partnerships that can make invisible contributions from other actors. Besides, a rights-based approach needs to be put first as there could be a conflict of interest by the same private sector financing their own contributions. We encourage inclusion of other rights-holders and explore their different contributions and provision of adequate support.

- The role of Civil society is not given enough emphasis; the contributions from community-led initiatives in combating pollution were ignored in the report and traditional knowledge is not even referenced. It is important to recognize that local communities and indigenous peoples often have to endure harsher effects from pollution and that their actions against it have been more effective. Communities have cleaned up and restored entire ecosystems. If provided with legal tenure rights and appropriate support, communities have thrived and kept on living in harmony with nature after thousands of years. Many of them still keep the knowledge for less polluting lifestyles and nature-based technologies for tackling ecosystem degradation including from climate change. In this case, there are quite a few examples that portray their contributions and that need to be spelled out; from entire beaches cleaned up, ancestral adaptation techniques, to fully recovered forests; or banning plastic use and encouraging goods made with local materials.

- When talking about pollution it is also necessary to mention population control, sexual health and reproductive rights, and gender equality. In this context, it is necessary to take into account the proceedings of the International Conference on Population and Development (ICPD).<sup>9</sup> The report could greatly benefit by making this important link.

- References to technologies in the report leave out the importance of them being sound and safe. Biotechnology is being used for cleaning oil-contaminated environments using bacteria or fungi for decontamination but side-effects from using different living organisms in certain ecosystems might actually backfire as there are not enough studies that can ensure that proposed technologies are safe. It is very important to keep a precautionary principle when dealing with technologies and not just rely that they will 'save the day' and that we can keep on with the same reckless behavior. Again, there is a contradiction in promoting 'growth' (even if 'green'), intensification, etc. when the report has already cautioned about overconsumption and consumer behavior. For instance, agro-ecology per se can simply not be intensified, and Climate Smart Agriculture is a recipe for disaster given that it also promotes intensification demanding more area for harvesting different crops which also include GMOs.

- Indeed, not enough knowledge is shared about successful and failed policies and solutions adopted by countries to better manage pollution. One such case concerns lessons learned from measures taken to address the ozone layer depletion. A box or Annex on this interesting case would be greatly appreciated.

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<sup>9</sup> <http://www.unfpa.org/icpd>

- Although pollution due to fracking is shallowly mentioned, it needs more argumentation given many government's interest in resorting to this technique. It would be of utmost importance to delve into this issue backed by case studies in different areas.

- In marine and coastal issues, is not just about phasing out plastic but encourage local materials for packaging, like before plastics took over the world! Also, despite mentioning the fishing and shipping industries, and cruise-ships, we feel the report could still go a little further in explaining their impacts, both at shore (i.e. petrol based motor vehicles in beaches and coral reefs) and open ocean (i.e. big fishing boats & cruiseships)

- We agree that the nature of pollution suggests that responses need to go beyond governance, and tackle head-on the choices we make about how we produce and consume. Under the 10YFP-SCP, we caution that there needs to be more stringent conditions on subscribed program companies' production processes.

- Transparency is key to achieve a pollution free planet. Industries should start by recognizing their responsibility in land and soil pollution; governments must ensure appropriate mechanisms to monitor and control their impact on land and soil and its direct/indirect impacts to nearby communities. The report mentions mining in this regard but the livestock sector also needs a complete shift in their practices and include not just antimicrobials but also antibiotics reporting, absent in the report.

- We agree that one of the main problems in dealing with chemicals is the large gap in publically-accessible data on chemical performance and safety and would urge Parties as well as UN Agencies and Institutions to work on this aspect so as to evaluate and determine the chemical's effects on human health and the environment.

- The report barely mentions coal

- More emphasis could be given related to benefits in the implementations of the polluter pays principle.

- Water pollution: Ban practices known to have detrimental impacts on water quality (i.e. fracking, mining)

- No mention of excessive packaging and measures at the policy level to discourage them

- The report has no reference to food waste in the Global North

- We are happy that the report addressed the problems with advertisements that support overconsumption

- It is very valuable to have 'Guidelines for providing product sustainability information' to support companies, governments and organizations to drive transformative change in this area but it needs stronger methods for monitoring/verification.