



**Report of the Brussels  
Organization for Human  
Rights and Development on  
the consultations provided  
to the European Union**



## Proposal for a Council Recommendation on education for environmental sustainability

- Each year more than 6 million people die from air pollution.
- Around 150,000 people die every year due to extreme weather conditions.
- About 7 million hectares of forests are cut down due to deforestation.
- About 3 billion people rely on dirty fuels such as: animal waste and charcoal.
- Each year 8 million tonnes of plastic get dumped into the oceans.

### Problems this initiative aims to tackle:

- Lack of knowledge and understanding when it comes to education on environmental sustainability.
- Citizens are usually concerned for the environment but when it comes to taking action they tend to pay no attention to it.
- Difficulties in integrating environmental sustainability into mainstream activities in educational institutions.

### Solutions:

- BHRD encourages all efforts towards ending environmental issues and adopting better ways to ensure environmental sustainability.
- BHRD supports and endorses this initiative for enhancing the environment.
- BHRD recommends that civil society organizations get more opportunities in equipping schools and educational institutions with the right tools to increase environmental sustainability, such as lectures and seminars.
- BHRD suggests that all educational institutions integrate knowledge on environmental sustainability and include them in the curriculum.
- Allow more hands-on activities regarding environmental sustainability such as: school trips, projects and community work.
- Recognize all the disastrous things that happened and are still happening till now to the environment such as: deforestation, pollution, plastic getting dumped into the oceans and global warming.
- Encourage young learners to come up with new creative ideas and solutions towards environmental sustainability.
- Encourage students to move from awareness of the environmental issues to an understanding of these issues and helping to overcome them through the previously stated points.



## Biodiversity Protection: Nature Restoration Goals under EU Biodiversity Strategy.

- The organization supports the objectives of restoring nature under the Biodiversity Strategy, and we also support the existence of a legislation defined by the European Union regarding that matter.
- Biodiversity is the foundation that supports all forms of life on earth and underwater, affects every aspect of human health, provides fresh air and water, and without it, life on Earth will not be possible.
- BHRD recommends that civil society organizations should be allowed and more open to active participation in these goals, and that should be emphasized in the legislation.
  - Loss of biodiversity:

The loss of biodiversity causes the unsustainability of Earth's safety, so we must reimagine our relationship with nature and put nature at the heart of the policy-making process.

- Biodiversity and the Corona pandemic "Covid-19":

The emergence of Covid-19 emphasizes the necessity and importance of preserving biodiversity, in order not to destroy the system that supports human life.

- Non-loss of biodiversity helps to ensure that diseases do not spread or dominate quickly as was the status of Covid-19
- The loss of biodiversity provides opportunities for pathogens to move between animals and humans.
- Human actions, such as deforestation, wildlife encroachment, agriculture and the acceleration of climate change, have disrupted the delicate balance of nature.
- We must not change the natural order -- which would protect us naturally, and not create conditions that allow the spread of pathogens -- including viruses.
- The legislation and laws necessary to achieve these objectives alone are not enough, and therefore must be accompanied by a community awareness campaign that helps to achieve strategies and make them a reality.



## Evaluation of the Victims' Rights Directive.

- The Victim's Rights Directive was created to support victims of crime of all EU Member States. Also, the Directive states a set of rights for victims of crimes.
- In Europe, 75 million people become victims of a serious crime every year. One out of three women report being sexually or physically abused. Two million children get trafficked every year.
- BHRD supports and endorses this initiative on evaluating The Victim's Rights Directive.

### Problems of this initiative:

- Such horrendous crimes can have a deep emotional and physical impact on crime victims that not only does it affect their happiness, but also their economic state.
- While several precautions are done to stop crime from happening in the first place, not much is done to minimize the harmful effects of the crime after it's done and in many cases it could be worse by the way our society and authorities handle the situation afterwards.
- More often than not, victims do not receive appropriate information, support and protection.
- Usually victims have to tell their traumatizing story to many people: police officers, prosecutors and the judge.

### Solutions:

- BHRD suggests the EU allows more opportunities for civil society organizations.
- Victims have to be talked to in a respectful manner, and their concerns should be taken seriously.
- Crime victims should be treated fairly with no discrimination (nationality, religion, race, age, gender, etc).
- Crime victims should be protected from further harm by the perpetrator and psychological harm from legal procedures.
- BHRD strongly believes that all victims of crime should receive medical and psychological help to help them recover and cope better.
- BHRD believes that all victims should have the opportunity to be heard regardless of their language.
- Crime victims should be provided with all the help they need (shelter, support, etc).



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## Protecting the environment in the EU's seas and oceans (review of the Marine Strategy Framework Directive)

- One might think if I do not live next to the ocean then it does not affect me. Well it does, almost three-quarters of the planet are made up of oceans. The phytoplanktons that live on the surface of the water are responsible for half of the oxygen in the atmosphere.
- Unfortunately, human activities have a negative impact on the oceans, affecting marine life, ecosystems and habitat.

### Problems this initiative aims to tackle:

- Both financial and human resources devoted for the directive do not seem to be enough to fulfill the needs required.
- While several efforts have been made to protect the marine environment, the level of protection varies from one protected area to the other and is not sufficient.
- The MSFD could use more data gathering and analysis. Marine protection could also use more digital tools.
- Member States are generally late in reporting problems, which in turn prevents the Commission from providing accurate timely analysis and suggestions.
- Member States programmes are not always focused on tackling the issues at-hand.
- According to the directive, Member States were supposed to reach Good Environmental Status (GES) by 2020. However, it is extremely hard to verify whether this point is reached because many Member States' definition of GES is not specific enough to be measurable and not regionally coherent.
- Biodiversity loss, pollution, fisheries, seabed damage, introduced species, ocean warming and ocean acidification; are all examples of impacts responsible for the decline in the marine environment.
- Coastal economies mainly rely on fishing and tourism. If workers think they can not do their work then there is a big chance they will not assist in saving the marine environment.

### Solutions:

- BHRD supports and endorses this initiative in protecting the marine environment and the review of the Marine Strategy Framework Directive.



- BHRD suggests allowing civil society organizations to lend a helping hand to both the European Commission and European countries, so that they both work hand-in-hand to enhance the marine environment.
- It is important to realize that everything is interconnected, it is absolutely vital that marine protection plans account for the fact that one area affects the other.
- Governments need to implement stricter regulations regarding the marine environment with serious punishments if those regulations get disregarded.
- Conservation requires a lot of money, so it is important to provide marine environment organizations with enough money to work efficiently. Which can be done by a fundraiser.
- BHRD strongly suggests increasing awareness concerning the marine environment which can in turn provide more human resources devoted to the cause. This means it will also provide job opportunities.
- BHRD recommends that the EU creates a regulation that states clearly what is the Good Environmental Status (GES) that we hope to achieve.



## Integrated water management – revised lists of surface and groundwater pollutants.

- The purpose of this initiative is to achieve The Zero Pollution Ambition. There is nothing in life that does not require water so it is absolutely vital that the water we use and drink be sanitary and dirt-free.

The United Nations estimated that around 10% of the world's population do not have access to clean water. 14 billion pounds of plastics are dumped into the oceans each year. Human activity adds 1.2 trillion gallons of untreated wastewater

- into the water supply each year. 80% of wastewater contaminates groundwater after treatment.

### Problems this initiative aims to tackle:

- Lack of updated knowledge concerning new pollutants.
- Marine life is strongly affected by pollutants found on water surfaces; death of aquatic life will cause disruption in food chains.
- Large number of cases of soil and water contamination.
- Pesticides and nitrates are a serious threat to groundwater.
- Fertilizers can sometimes cause a thick layer of algae to grow on the surface which blocks sunlight from the vegetation in the deeper parts of the ocean and lakes.
- Many diseases can spread through water contamination.
- The Water FC concluded that, in relation to chemical pollution, the legislation focuses on some less relevant older pollutants while not sufficiently addressing a number of pollutants of emerging concern, such as pharmaceuticals, plastics and Perfluoroalkyl chemicals (PFAS).

### Solutions:

- BHRD supports and endorses this initiative to revise the Water Framework Directive.
- BHRD suggests allowing civil society organizations to lend a helping hand to both the European Commission and European countries, so that they both work hand-in-hand to minimize water pollution in groundwaters and surfaces.





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- BHRD strongly suggests that we increase awareness regarding water pollution and how deeply it affects anything and everything related to life.
- BHRD suggests that governments need to implement more strict regulations regarding preventing water pollution with serious consequences if these regulations get overlooked.
- These lists of pollutants should be reviewed thoroughly and regularly (consider new discoveries and developments in science research).
- Pharmaceuticals are also one of the main factors contributing to water pollution whether they get dumped or leaked from factories.
- New information on some of the substances has come to light since the last reviews of the lists, prompting consideration of those substances and/or their standards or designation as hazardous, and that information must also be acted upon to ensure that the lists are up to date.
- Do not dump waste into oceans and rivers.



## Online and distance learning in primary and secondary education.

### Problem the initiative aims to tackle :

During the Covid 19 pandemic all schools and educational institutions were forced into adopting online learning. While many schools proved their capacity in dealing with such a sudden change several problems arose, such as :

- Teachers and schools were unequipped with proper digital tools.
- Lack of guidance from the proper authorities.
- Data protection (information and exams leaking).
- Loss of teacher-student relationship.
- Internet connection was weak due to overload.
- Children rely on their parents first-hand when faced with a problem.
- Loss of extra-curricular activities.
- Loss of social benefits of being part of a school community.

### Solutions :

- BHRD suggests allowing more opportunities for Civil Society Organizations to enhance and consult educational institutions into bettering their environment.
- BHRD suggests that each school/educational institution seeks a good data protection company to ensure no pirating or plagiarism.
- The EU should create a platform where all educators can communicate together about the problems that they face day-to-day and how to overcome them.
- While the classroom offers an opportunity for role-playing with immediate face-to-face feedback, online learning offers personalized, self-paced learning with components that lend themselves to interactive media such as skill-building, games, videos, tutorials, quizzes and social media components. That is why BHRD recommends that all schools adopt blended learning.

### Why blended learning?

Blended learning combines both online learning and face-to-face learning. It engages different types of learners, those who prefer independent computer based learning and those who prefer a structured environment with a face-to-face instructor.

The success of blended learning is due to 5 main reasons:



- Accounts for everyone: Blended learning takes into account all types of learners whether they prefer face-to-face learning or online learning or maybe even both. It also utilizes a variety of methodologies so the content can be customized to the learner.
- Lower in cost: In-class learning may seem cheaper than online learning, it is really not. Based on a study made in 2015 whether blended learning is cheaper or not it proved that it costs 24% less to educate a student via the blended learning approach.
- Fun and engaging: Students reinforce what they learned through a variety of interactive media. An added benefit is that it updates the teachers on the student's progress and their weak points that need working on.
- Learning trends and updates: Blended learning uses online and offline technologies allowing instructors to be up-to-date on teaching techniques and trends.
- Reach and personalization: Global organizations face the problem of making learning universal. Language interpretation and travelling are two concerns that could be addressed with blended learning.
- If all learners have different levels of understanding and expertise then why force them into the same training program. Bear in mind that blended learning also offers a great opportunity for anyone who wants to learn, not just students, adults too. Blended learning creates a buffet-style approach allowing learners to choose when and how they interact with the subject.

Blended learning models:

- Rotation: Allows learners to rotate from one activity to the other on a fixed schedule where at least one activity is online and may sometimes be carried out in a lab. There are several forms of rotation like individual rotation which relies on each individual student's schedule.
- Enriched virtual: It is an alternative to full-time online school that allows students to complete a majority of their coursework at home.
- A la carte: It enables students to take an online course in addition to other face-to-face courses. A la carte is often found in secondary education when schools can not provide Advanced courses or elective courses.



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- Gamification: Uses motivation as game play. By using points learners feel a sense of competition and in turn are more motivated to explore the subject on their own.
  - Flex: In other terms personalized learning. Students control what they learn according to their needs and wants. The instructor is usually present as a mentor to answer questions.
  - Flipped classroom: Students learn at home via online coursework and lectures whereas class time is used for teacher guided coursework and projects.
- When you are teaching a diverse group it is very hard to adopt one learning style or one certain technique that will suit everyone. But with blended learning it allows each person to personalize their subject matter for time consideration, personal preferences and learning techniques.



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Solutions:

- BHRD supports and endorses this initiative in protecting the marine environment and the review of the Marine Strategy Framework Directive.
- BHRD suggests allowing civil society organizations to lend a helping hand to both the European Commission and European countries, so that they both work hand-in-hand to enhance the marine environment.
- It is important to realize that everything is interconnected, it is absolutely vital that marine protection plans account for the fact that one area affects the other.
- Governments need to implement more strict regulations regarding the marine environment with serious punishments if those regulations get disregarded.
- Conservation requires a lot of money, so it is important to provide marine environment organizations with enough money to work efficiently, which can be done by a fundraiser.
- BHRD strongly suggests increasing awareness concerning the marine environment which can in turn provide more human resources devoted to the cause. This means it will also provide more job opportunities.
- BHRD recommends that the EU creates a regulation that states clearly what is the Good Environmental Status (GES) that we hope to achieve.





## Revision of EU legislation on hazard classification, labelling and packaging of chemicals

- Every year, almost 5% of workers that deal with chemicals on a regular basis suffer from chemical exposure that could result in a serious injury or in some cases death.

### Problems the initiative aims to tackle:

- The CLP Regulation (classification, labelling and packaging of chemicals) is unclear about the identification and classification of certain chemicals.
- Lack of public awareness on hazardous chemicals.
- Insufficient public resources.
- The legal impossibility for companies to use multilingual fold-out labels (multi-page booklet labels).

### Solutions:

- BHRD suggests allowing more opportunities for Civil Society Organizations to consult chemical companies into improving their services.
- BHRD endorses and supports this initiative and the revision of the EU legislation on hazard classification, labelling and packaging of chemicals.
- BHRD suggests that each chemical company stays updated on the legislations done by the EU and/or governmental legislations.
- The CLP Regulation should be revised for errors as soon as possible.
- BHRD recommends to update the Regulation whenever there is a change in the classification of a chemical and/or mixture which could result in a more severe hazard.
- Allow companies to use multilingual fold-out paper labels.
- Recognize that endocrine-disrupting chemicals (EDCs) are a new hazard classification.
- Recognize that minimum exposure to a certain chemical may not harm the human body but if exposed to such chemical occasionally it could cause further damage.

Revision of the Ambient Air Quality Directives.



- According to the World Health Organization, 9 out of 10 people breathe in polluted air.
- Air pollution is also responsible for one third of deaths from stroke, lung cancer and heart disease.
- Particulate matter contributed to more than 400,000 premature deaths in Europe.

Problems this initiative aims to tackle:

- Current EU standards are less ambitious than scientific advice.
- Not all reported data is equally useful.
- EU air quality standards allow higher air pollutant concentrations than is scientifically advisable.
- The Ambient Air Quality Directive states standards for 13 different air pollutants; for several pollutants these standards are not recommended by the World Health Organization (WHO).
- There is scope for further improvements to the legislative framework, regarding penalties and public information.
- There are substantial delays in taking appropriate and effective measures to meet all EU air quality standards throughout Member States.
- The criteria on monitoring could be further clarified to reduce ambiguity and increase the comparability of air quality data.
- Air quality models have improved but they are not yet used to their full potential due to the lack of common modelling standards.
- Air quality plans have not always lived up to the requirement to ensure compliance with the EU air quality standards.
- Several activities such as agriculture, industry and transportation release air pollutants harmful to both the environment and human health.
- Exposure to air pollution can damage the respiratory system and lead to premature death especially in European cities where the exposure is the highest.

Solutions:

- BHRD endorses this initiative to revise the Ambient Air Quality Directive and supports all efforts towards this cause.
- BHRD suggests allowing more opportunities for Civil Society Organizations to aid the EU in minimizing the amount of pollution.
- Governments need to implement more strict regulations regarding air pollution with serious penalties if those regulations are overlooked.



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- It is absolutely vital to increase education and awareness regarding air pollution.
- BHRD suggests encouraging the youth to come up with creative ideas to end all pollution.
- E-reporting allows more efficiency and reduces most errors when it comes to monitoring.
- Consider adopting modern pristine solutions to end air pollution. In Italy there are smog-eating buildings that absorb smog from the air and turn chemicals such as nitrous oxide to harmless salts that eventually get washed up with rainfall.



## Updating Judicial Cooperation Between EU Countries - the use of digital technology.

- BHRD supports the initiative to update the judicial cooperation between EU countries - the use of digital technology.
- The Corona pandemic is a threat that must be transformed into an opportunity for development and modernization in all areas, including the field of justice and fundamental rights.
- It will make it necessary for the participating authorities in each country to use digital technology, rather than paper, to communicate, although it is a development and modernization imposed by reality, but the difficulties and challenges facing these systems must be avoided, especially as this development threatens piracy that may lead to the loss or withholding of information.
- Information must be protected and we have to make sure that its transmission and exchange are safe.
- We emphasize that we encourage modernization and development but in the same time taking into account not completely dispensing with the paper system.



## "Education and Training"

- We value and support the roadmap of Upskilling Pathways for Adults, particularly adults with low-level of skills, knowledge and competences.
- Adult education requires a continuous effort in order to allow them to acquire knowledge and skills as well as work on talent development, including targeting literacy and engaging in activities of interest to certain groups.
- We emphasize that Europe has achieved tangible high success in caring for and educating adults, improving their skills and raising efficiency.
- The education and upskilling of adults is an urgent need in order to contribute to create and sustain development, and to achieve the contribution of individuals and groups to economic and social growth.
- In order to achieve greater and greater success in that framework, a real and clear desire among adults to learn and take advantage of the opportunities available must be created, and the appropriate method must be chosen for them to receive different sciences and skills, which will be new to them.

Adults have some features and advantages, so we must pay attention to these features when developing programmes and legislation to improve their skills and education, because adult education is different from that of children in many respects:

1. Adults are self-reliant in education and do not need to rely on others as young learners.
2. Adults have a certain amount of life experience, as some of them may have received a little education that would give them the ability to absorb quickly and easily learn.
3. Adults often need to learn and improve skills to help them develop their own lives.

- We encourage adults who have drop out school or university to complete their education.

, returning to educational institutes in order to improve their careers,

but without leaving their jobs and devote themselves to education again.

- BHRD recommends that civil society organizations should be allowed more space to participate effectively in achieving these goals, and to be supported in upskilling, particularly literacy for adults.
- The Global Corona Pandemic "Coved 19" imposes different situation and circumstances on the world, that should be estimated when developing a road map or introducing legislation for the future.



- Having to take precautionary measures, by closing schools and institutes and disrupting jobs, in order to protect people against "Coved 19", calls for a sophisticated policy when thinking about improving adult skills.
- A flexible legislative framework that facilitates the implementation of procedures to keep up with emergencies, is also needed.
- There is a need to protect education funding and avoid the adverse effects of adult education.
- The need to build an adult education system that is adaptable and responsive to challenges.
- The need to avoid adverse economic impacts as a result of crises and epidemics, and their impact on upskilling for adults.





## "Education and Training"

- We endorse and support the roadmap of Upskilling Pathways for Adults, particularly adults especially those with low levels of skills, knowledge and competencies and helping adults to acquire minimum literacy, numeracy, digital skills and/or a wider range of skills.
- The education and upskilling of adults is an urgent need in order to contribute to create and sustain development, and to achieve the contribution of individuals and groups to economic and social growth.
- BHRD believes that adult education requires a continuous effort in order to allow them to acquire knowledge and skills as well as work on talent development, including targeting literacy and engaging in activities of interest to certain groups. In addition to teaching various skills according to technological and digital information progress.
- BHRD emphasize that the European Union, with its members, has achieved tangible high success in caring for and educating adults, improving their skills and raising efficiency. However, efforts must continue to reach a higher level of achievement in this matter.
- What's required to achieve more and more:
  - In order to achieve greater success in that framework;
  - A real and clear desire among adults to learn and take advantage of the opportunities available must be created,
  - The appropriate method must be chosen for them to receive different sciences and skills, which will be new to them.
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but without leaving their jobs and devote themselves to education again.

### Civil society organizations:

- Civil society has a crucial and effective role in achieving the Sustainable Development Goals in general, particularly in the development and improvement of skills and the development of vocational education and training.
- BHRD recommends that civil society organizations should be allowed more space to participate effectively in achieving these goals, and to be supported in upskilling, particularly literacy for adults.

### Covid-19 and improving teaching skills:

- The Global Corona Pandemic "Coved-19" imposes different situation and circumstances on the world, that should be estimated when developing a road map or introducing legislation for the future.
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