



HEAL
HEALTH AND
ENVIRONMENT
ALLIANCE



CHEMTrust
Protecting humans and wildlife
from harmful chemicals



ClientEarth



EEB
European
Environmental
Bureau



chemsec
INTERNATIONAL CHEMICAL SECRETARIAT

Jean-Claude Juncker, President of the European Commission

Frans Timmermans, European Commission First Vice-President

Better Regulation and Interinstitutional Affairs

Jyrki Katainen,
Vice-President for Jobs, Growth, Investment and Competitiveness

Karmenu Vella,
Commissioner for environment, maritime affairs and fisheries

17th June 2019

Object: Delayed publication of the non-REACH REFIT outcome and High-Level Conference on the future of European chemicals policy

Dear Jean-Claude Juncker,
Dear Frans Timmermans,
Dear Karmuna Vella,
Dear Jyrki Katainen,

In the context of the upcoming European Commission High-Level Conference “EU chemicals policy 2030: building on the past, moving to the future” (27-28 June, Brussels), **we are writing to you to express our concerns and ask for clarification about the delayed publication of the outcome report of the Fitness check on chemicals legislation (excluding REACH) as part of the REFIT programme.**

As civil society organisations, we welcome the European Commission’s willingness to reflect on the achievements of current European policies that regulate chemicals and to engage stakeholders on a debate about what kind of policies and institutional structures will be needed to address the challenges of protecting Europeans and our environment from the harmful effects of chemicals in the future. This discussion should send a strong signal about the need to prioritise chemicals in the upcoming institutional reshuffle, including the delivery of the overdue non-toxic environment strategy.

However, less than two weeks before the conference, **we are extremely concerned that the outcome of the evaluation of all the chemicals policies except REACH (non-REACH REFIT) has not yet been published.** In our view, the publication of this evaluation report – which is already long overdue – is absolutely essential.

In fact, we previously understood that the purpose of the conference was precisely to use this document – together with the REACH review outcome, the assessment of the interface between chemical, product and -waste legislation as well as the study on a non-toxic environment – to have an informed discussion on the future of chemicals policies, including how to make progress on the non-toxic environment strategy. The objectives of the conference are described as follows: a *“High-level conference where the Commission would provide the outcomes of its recent evaluations and initiatives in the EU chemicals policies and all the relevant stakeholders could discuss opportunities and potential developments for the EU chemicals policy”*¹.

This is **adding to concerns that our respective organisations have already expressed on numerous occasions about the European Commission’s missed deadline to deliver a non-toxic environment strategy**, as per the commitments made by the EU through the seventh Environment Action Programme (7th EAP). The European Commission has indicated that the outcome of the REACH review, the assessment of the interface between chemicals product and waste legislation², and the non-REACH REFIT should feed into the development of such a strategy³, which further highlights why the publication of the non-REACH REFIT outcome should happen as soon as possible.

In this context, we are asking you to **urgently release the outcome of the non-REACH REFIT ahead of the High-Level conference and clarify that its conclusions will be used in a fully transparent way as a basis for the discussions to take place on 27-28 June. We also urge you to clarify by then the proposed timeline for the development of the non-toxic environment strategy, the promised overhaul of the strategy on endocrine disruptors and the assessment of the interface between chemicals, product and waste legislation.**

We thank you for considering our concerns and look forward to discussing them with you ahead of the conference.

Yours sincerely,

Genon K. Jensen
Executive Director
Health and Environment Alliance (HEAL)

CC: Martin Selmayr, Secretary-General of the European Commission

¹ High-Level Conference website, concept note, <https://euchemicalspolicy2030.teamwork.fr/docs/concept-note-high-level%20conference-on-chemicals-upd-6-may.pdf> (last consulted 7th June 2019)

² http://ec.europa.eu/smart-regulation/roadmaps/docs/plan_2016_116_cpw_en.pdf

³ http://ec.europa.eu/environment/chemicals/non-toxic/index_en.htm

On behalf of:

European organisations:

- Health and Environment Alliance (HEAL)
- CHEM Trust
- ClientEarth
- The European Environmental Bureau (EEB)
- International Chemical Secretariat (ChemSec)
- Center for International Environmental Law (CIEL)
- Health Care Without Harm (HCWH) Europe
- Women Engage for a Common Future – WECF
- European Academy for Environmental Medicine e.V. (Europaem)

Armenia:

- Armenian Women for Health and Healthy Environment (AWHHE)

Austria:

- GLOBAL 2000 Austria

Belgium:

- Kom op tegen Kanker (Flemish Cancer League)

Denmark:

- The Danish Ecological Council

France:

- Générations Futures
- Réseau Environnement Santé (RES France)

Germany:

- BUND – Friends of the Earth Germany
- Health and Environment Justice Support (HEJSupport)
- Pesticide Action Network Germany (PAN Germany)

Greece:

- ECOCITY

Italy:

- International Society of Doctors for Environment Italy (ISDE Italy)

Malta:

- Action for Breast Cancer Foundation

Portugal:

- ZERO - Association for the Sustainability of the Earth System

Spain:

- Ecologistas en Acción
- Fundación Alborada
- Hogar sin Tóxicos / Fundación Vivo Sano

United Kingdom

- Breast Cancer UK
- Community Hygiene Concern

