

## **HEAL response to the Beating Cancer Plan roadmap**

### ***EU Environmental Policies as a Lever for Cancer Prevention***

The Health and Environment Alliance (HEAL), welcomes the opportunity to comment on the EU Commission's roadmap for the Europe's Beating Cancer Plan, a planned Communication and accompanying Staff Working Document(s) planned for the last quarter of 2020.

### **A toxic-free environment as a long-term cancer preventing environment for the EU and beyond**

Some chemicals in the work and home environment are known to be carcinogenic; others disrupt the human hormone system and are associated with hormonal cancers, such as breast cancer and prostate cancer. EU environmental action and implementation by member states is a major component of primary cancer prevention – it can contribute to reducing the 40% of preventable cancers, and meeting the WHO targets on non-communicable diseases to reduce cancer deaths by 25%.

HEAL welcomes that the European Beat Cancer Plan Roadmap puts a strong emphasis on how many EU environmental policies can help prevent the preventable cancer cases through an ambitious Farm to Fork Policy for affordable, healthy and sustainable food systems as well as the Zero Pollution Strategy to reduce environment chemicals through air, soil and water pollution. It also foresees using legislative measures with targets to reduce exposure to carcinogens.

### **Urgent regulatory action to decrease the presence of substances linked to many types of cancer**

Scientific evidence calling for EU legislative action has been accumulating over the past decades. In 2010 the European Parliament and Council urged “reducing exposure to environment contaminants” as part of the EU Commission's cancer prevention strategy. The time for bold action to reduce exposure is now. For instance, removing glyphosate from the market following its 2015 IARC classification as a probable carcinogen to humans, banning [PFAS](#) for non-essential uses, a forever chemical, as exposure is associated to a number of serious health impacts including kidney and testicular cancer.

### **Green Deal cancer prevention: eliminating sources of cancer causing pollution**

To prevent the preventable means to cut pollution at source. Humans can be exposed to carcinogens through what they eat, drink, breathe and touch: hazard-based legislation is thus the most effective tool to protect the population from exposure to cancer causing substances throughout their lives, including exposure in utero, which can increase risks later in life of serious diseases, including cancer.

HEAL is calling on the European Commission to address the following:

### 1. Fight cancer with the most vulnerable in mind

- **Protect those most vulnerable:** Focus action on the vulnerable groups to ensure protection of the broader population, by applying prevention and precaution where and when vulnerability is being expressed: nobody should be exposed to CMRs at work, in school, in hospitals, in utero.
- **Work place exposure – making occupational cancer data visible:** Ensure that employers comply with the established exposure limit values, recognise occupational carcinogens, and support education of health professionals to collect gender disaggregated data on workplace exposure for existing cancer registries.

### 2. Prevent cancer from farm to fork:

- Ensure the **Farm to Fork Strategy strives to end intake of pesticide residues** linked to cancer. HEAL supports the ECI to save bees and farmers' health which calls for a phase-out synthetic pesticides in EU agriculture by 80% by 2030.
- Revise **outdated EU food contact materials legislation** to ensure carcinogens and EDCs associated with increased cancer risk, and other negative health impacts, are eliminated.

### 3. Prevent cancer through zero-pollution in every part of the environment

- **EDCs:** Close the current endocrine disruptors gap in the sectorial legislation and apply cross-sectorial coherence: EDCs should not be allowed in toys, cosmetics and food contact materials, nor in any other consumer product.
- **Toxic chemicals:** Ensure Europe's Beating Cancer plan is closely linked to a comprehensive EU Chemicals Strategy for Sustainability and other chemical policy frameworks to rationalise and simplify EU's chemicals and pesticides regulations for substances causing cancer; swiftly prepare the non-toxic environment strategy, and act to detoxify the circular economy.
- **Air pollution:** Lower the tolerance to concentration of pollutants in both outdoor and indoor air, as there is no safe level of air pollution. The EU should speed up alignment of EU legal air pollution limits on the WHO guidelines to enter into force by the end of the current mandate.

### 4. Raise people's awareness on carcinogens in daily life's environment

- **Revise the European Code of Cancer** to give citizen's information on ways to limit exposure to environmental carcinogens in their daily life.
- Support member states and civil society in **sharing best practice and actions on addressing environmental factors in national cancer plans**.

For more information on environmental prevention of the disease, please visit HEAL's website: <https://www.env-health.org/>

**The Health and Environment Alliance (HEAL)** is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 80 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

HEAL's EU Transparency Register Number: 00723343929-96