



European Parliament

Committee on the environment, public health and food safety (ENVI committee)

Brussels, 23rd June 2020

Dear Members of the ENVI committee,

I am contacting you on behalf of the [Health and Environment Alliance \(HEAL\)](#) in relation to the [draft motion for a resolution on the European chemicals strategy for sustainability](#). HEAL is the leading not-for-profit organisation addressing how the environment affects human health in the European Union and beyond, uniting over 80 member organisations of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts, who all together represent more than 200 million people.

On Thursday 25th June, you will vote on the proposed amendments and compromise amendments on the resolution on the chemicals strategy for sustainability. Hereby you will find **HEAL's voting advice about the compromise amendments** that have been crafted over the last weeks through negotiations between the different political groups.

HEAL is asking you to support the following compromise amendments:

- **Amendments 1 to 7 included;**
- **Amendments 9 to 30 included;**
- **Amendments 32 to 34 included.**

In HEAL's view, these amendments are illustrative of the European Parliament's commitments and opportunities to contribute to a chemicals strategy that promotes increased health and environment protection and allows the transition towards a safe and circular economy. These compromises are in line with HEAL's five main demands regarding the chemicals strategy for sustainability (full details can be found in the annex at the end of this email):

- 1. State the facts about chemicals and act based on scientific evidence for increased health and environment protection**
- 2. Minimise exposure to harmful chemicals by 2030**
- 3. Allow the transition to a fully non-toxic circular economy by 2030**
- 4. Increase coherence and consistency across chemical regulations and overhaul chemical evaluation**
- 5. Increase transparency**

We believe that these compromise amendments provide a strong impetus towards increased chemical sobriety and support for those industry players who contribute less and safer chemical releases into our environment. **We call on the European Parliament to support them, and demand a chemicals strategy geared up towards disease prevention and closely feeding into Europe's health protection objectives and initiatives, such as the EU Beating Cancer plan.**

Justifications for not supporting the following compromise amendments:

- **Compromise amendment 8:** While HEAL shares the view that animal testing needs to be minimised and more efficiently used for regulatory purposes, we are concerned about the proposed wording of this amendment. At present, animal testing remains a necessity to test for sensitive health endpoints such as endocrine disruption and is therefore a necessity to regulate in a health-protective way. However, reducing animal testing can and should happen through upgrading chemical evaluations (for example by increasing evaluations of groups of chemicals and fully taking into account independent peer-reviewed literature in regulatory discussions) and by using the precautionary principle in case of scientific uncertainties instead of multiplying unnecessary testing. **We regret that these important aspects are missed in compromise amendment 8 and rather support the original wording proposed in paragraph 10 of the draft motion for resolution.**
- **Compromise amendment 31:** HEAL fully supports the call for increased and sustained funding for the European Chemical Agency (ECHA) to perform its work in an ambitious and protective way. In this compromise amendment, we regret the sole flagging of investment of additional ECHA staff dedicated to alternatives to animal testing and the missed opportunity to call for increased funding dedicated to some of the most urgent priority areas in terms of health and environment protection in the agency's work, including increased capacities for checking data compliance, supporting substitution to safe alternatives, or finalising and managing the database on substances of concern in products (SCIP).

On behalf of HEAL and our members, I thank you for prioritising health protection when considering improvements in Europe's chemical regulatory framework.

Yours sincerely,

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Annex – Details on HEAL’s five demands for the EU’s chemicals strategy for sustainability

1. State the facts about chemicals and act based on scientific evidence for increased health and environment protection

- While chemicals are part of our lives and our environment, **two third of the chemicals produced in Europe today are hazardous to health**. In the context of projected [doubling](#) of the volume of chemicals production by 2030, **this calls for shifting towards producing less hazardous chemicals overall and speeding up substitution towards safer and more environment-friendly alternatives**.
- **The global threats to health constituted by chemical pollution, biodiversity loss and climate change are [closely linked](#)** in part due to their common origins in fossil fuels and that tackling the increasing occurrence of non-communicable diseases requires political determination and action to control chemical releases from the source accordingly.
- **According to [Eurobarometer](#)**, two in three citizens are concerned about exposure to hazardous chemicals, less than half of them feels well informed about the potential dangers of chemicals in products, and half of them think that the current level of regulations and standards should be increased.
- In HEAL’s view, **the Covid crisis** is a powerful reveal of the urgency to shift to a more holistic approach to chemical production, management, and use as well as **a unique [opportunity](#) to interrogate the reality of the interactions between our environment and health conditions and overall promote as safe and toxic-free an environment as possible**. Recent [studies](#) have pointed at the **role of chemicals, including endocrine disruptors, on the weakening of the immune system**, adding yet more to the body of evidence about the overall negative burden that our exposure to daily mixtures of chemicals on our health.
- **The costs of inaction are not only a threat to health, but also to the economy**, which Europe cannot afford. By way of example, the health costs of exposure to endocrine disruptors are estimated to be at least [163 billion Euros](#) for endocrine disruptors alone per year in Europe. Human exposure to preventable environmental chemicals estimated to cost [10% of global GDP](#) in health costs. Finally the costs of inaction on the persistent PFAS chemicals are estimated to be between [52 – 84 billion Euros](#) for all EEA countries .

There is therefore overall a strong impetus towards increased chemical sobriety and support for those industry players who contribute less and safer chemical releases into our environment. **We call on the European Parliament to demand a chemicals strategy geared up towards disease prevention and closely feeding into Europe’s health protection objectives and initiatives, such as the EU Beating Cancer plan.**

2. Minimise exposure to harmful chemicals by 2030

- As per [our vision for a non-toxic environment](#), this means **prioritising at major groups of hazardous chemicals for policy action towards exposure minimisation at EU level, including hazardous pesticides, endocrine disrupting chemicals, per- and polyfluorinated compounds (PFAS)**.

- **For endocrine disruptors**, stick to the European Parliament resolution of April 2019 and demand the development of provisions allowing for the identification of endocrine disruptors across regulations and their urgent addressing in food contact materials, cosmetics, toys, water, workers regulations. [In overhauling the current EU framework on endocrine disruptors](#), fully take into account these chemicals' specificities (low dose effects, occurrence of non-monotonic dose responses, effects across generations) and assume that there is no safe threshold for exposure and that exposure minimisation must be the rule rather than the exception.
- **For PFAS**, demand the speedy development of a European action plan to phase out all non-essential uses of these chemicals, as [requested](#) by the Council of Environment Ministers in June 2019.
- **Support the ban of all substances of very high concerns (SVHCs) from consumer products and food as a matter of principle**, with possible derogations when essential uses can be proven.
- Acknowledge that **specific parts of the population are particularly vulnerable** to hazardous chemicals and that regulation must protect them. This is especially the case for:
 - Pregnant women and unborn child, young children, teenagers, the elderly;
 - Workers – especially re: chemical industry or agriculture;
 - People of low socio-economic background because they might not have the information they need to protect themselves or simply the financial means to make those choices;
 - Those already affected by non-communicable diseases such as cancer.
- **Address the reality of people's exposure to mixtures of chemicals**, by demanding the development and use of a [mixture assessment factor](#) in REACH and other legislations.

3. Allow the transition to a fully non-toxic circular economy by 2030

- **Acknowledge the important role of regulation to boost innovation, starting with the full implementation of existing legislation.** A number of [major industrial players](#) have already committed to addressing hazardous substances throughout the supply chain, illustrating that the market is ready to move towards ambitious policies for a non-toxic environment. It is high time to reward industry players that promote the use of safe substances and materials and overall sobriety in product and process design in the context of the circular economy.
- **Incentivise truly safe innovation** through political and economic incentives towards the safe substitution of chemicals of concern (including through non-chemical alternatives) in order to reward health- and environment-friendly industry frontrunners.
- **Demand the Commission to not misuse recycling as an excuse to keep hazardous chemicals in the environment.** A truly circular economy will only work if aim is to have recycling loops free of toxic chemicals. The recent attempt to allow lead in recycled PVC is the perfect example of what should not happen in a functioning and health-protective circular economy and the [Parliament veto](#) was key in standing up for those principles.

- **Protection and innovation can go hand in hand if we are serious about implementing existing laws.** For instance, when it comes to industrial chemicals, REACH is indeed the most far-reaching piece of legislation in the world to date, but it needs to be better implemented to deliver on both aforementioned objectives.

4. Increase coherence and consistency across chemical regulations and overhaul chemical evaluation

- **We welcome the European Commission proposal to increase the efficiency of chemical evaluation and regulations,** including by avoiding to multiply the hazard assessment of the same chemical substance, or by using the identification of a chemical of concern (eg SVHC) as the reference point in order to trigger regulatory management across sectors and ban it as a principle across consumer products. **However the Parliament must stand for the highest protection levels in any agreed simplification exercises. The proposed ‘one substance one assessment’ principle should in no way be used in order to fast-track and circumvent the regulation of hazardous substances or to lower protection levels.**
- **Increased coherence, consistency and overall protection** could also be served by the following principles:
 - **Increasingly assess chemicals by groups** rather than individual substances in order to speed up the duly regulation of chemicals of concern and avoid wasting resources.
 - **Fully take into account independent peer-reviewed scientific evidence in chemicals assessment,** giving it the same weight as internationally validated studies, and always use the latest scientific knowledge. This is particularly critical when it comes to assessing chemicals for properties of concern such as endocrine disruption (for which internationally validated test methods are often not sensitive enough to assess critical endpoints), neurotoxicity or genotoxicity.
 - When it comes to the **objective of minimising animal testing, which all stakeholders support,** it is important to keep in mind the following:
 - Overall, **better use of precaution** in case of scientific uncertainties would be an **efficient way to limiting unnecessary testing while ensuring high levels of protection for human health.**
 - As of today, **non-animal tests are not well developed enough to properly test adverse effects for critical endpoints such as endocrine disruption,** making reliance on animal tests necessary to fully test substances for safety. **That is why the better use of the precautionary principle and of independent scientific literature is so critical to limiting the use of animals.**

5. Increase transparency

- **Increased transparency throughout the supply chain** is essential in the context of the circular economy and increased recycling. **Consumers also have the right to know,**



which substances they are being exposed to through products and food, and their right is currently not being upheld.

- Increased transparency also means better information about emerging scientific evidence on chemicals of concern and their effects on health and the environment. The development of **an early warning system** could allow triggering policy action based on early scientific warnings, also allowing the **development and communication of appropriate advice for citizens, with the possible involvement of health professionals for enhanced prevention.**

About HEAL

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 is independent of any political party or commercial interest. The alliance receives funding from the European Union, governments and private foundations as well as through membership contributions. We do not accept funding from sources with commercial interests.

HEAL's EU Transparency Register Number: 00723343929-96