



**To:**

**Zakia Khattabi**

Minister for Climate, Environment, Sustainable Development and Green Deal

**Frank Vandenbroucke**

Deputy Prime Minister, Minister for Social Affairs and Public Health

Brussels, 10<sup>th</sup> November 2021

**RE: Belgian federal government involvement regarding the addressing of the PFAS contamination around Antwerp**

Dear Minister Khattabi,  
Dear Minister Vandenbroucke,

**We are writing to you on behalf the Health and Environment Alliance (HEAL) and Grondrecht in order to ask for the involvement of the federal government in addressing the contamination of the area of Antwerp and Zwijndrecht by highly persistent per- and polyfluoroalkyl substances (also referred to as PFAS or “forever chemicals”).**

[The Health and Environment Alliance](#) is the leading European not-for-profit organisation addressing how the natural and built environments affect health in the European Union. Together with our over 90 member organisations around Europe, we work to shape laws and policies that promote planetary and human health, protect those most affected by pollution, and raise awareness on the benefits of environmental action for health. Through our programme on harmful chemicals, we promote large restrictions and substitutions of PFAS across Europe in view of health protection and disease prevention.

[Grondrecht](#) is a collective of concerned citizens that formed in response to the pollution of the sites surrounding the 3M factory in the area of Antwerp and Zwijndrecht in order to demand transparency about the scale of PFAS-contamination in Flanders and its related consequences for the health of the nearby communities and the environment, clean-up of the contaminated sites and the implementation of the polluter-pays principle.

**Background**

As you are aware, the operation of the 3M factory near Antwerp has resulted in the dumping, discharge and emission of harmful PFAS for several years, with PFOS being the most notorious one, all across the surrounding area, including the municipality of Zwijndrecht and city of Antwerp, which together house over half a million people. PFOS-contamination caught public attention after it was

(re)discovered during the excavation work that took place in the context of the Oosterweel infrastructure project. According to recent media reveals, local authorities appear to have been informed about the problem already back in 2017<sup>1</sup>.

PFOS is perhaps one of the most infamous members of the PFAS family. The substance is listed as a Persistent Organic Pollutant (POP) under the Stockholm Convention due to its extreme persistence in the environment, its potential for bioaccumulation (the substance has been found in Arctic animals, far from emission sources) and for long-range transport, as well as toxicity according to animal experimental studies<sup>2</sup>. PFOS is classified as a presumed reproductive toxicant (R1B) and a suspected carcinogen (C2) under the European hazard classification system<sup>3</sup>. Human exposure to the substance has been associated with very severe health outcomes, which include but are not limited to: interferences with the hormonal system, effects on the reproductive system and the development of the unborn child, on the immune system including the response to vaccines, the development of certain cancers (including kidney)<sup>4</sup>. The International Federation of Gynecologists and Obstetricians recently called for an immediate phase-out of all PFAS, including PFOS, stressing the health risks they pose throughout the lifetime, including in vulnerable development windows such as early-life stages in utero, adolescence, or pregnancy<sup>5</sup>.

### **Our requests**

**We welcome the Belgian federal government willingness to contribute to current European regulatory efforts on PFAS, as illustrated by the recent request to address the issue of PFAS as part of the agenda points of the recent council of Environment Ministers (6<sup>th</sup> October 2021)<sup>6</sup>.** The latter rightly acknowledges that *“it seems essential to adopt strong policies as soon as possible to avoid the above environmental damage and adverse health impacts, but also to support Member States in taking protective, remedial and clean-up measures”*.

There is no doubt that coordinated action at EU level is absolutely necessary to prevent future PFAS pollution, minimise exposure to PFAs chemicals as much as possible, remediate pollution, address PFAS-originating waste, and duly monitor impacts for the health of population and the environment. In this regard, the current development of a Europe-wide group restriction of all non-essential uses of PFAS is an important step forward.

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<sup>1</sup> <https://www.brusselstimes.com/news/belgium-all-news/174208/revealed-flemish-government-knew-about-pfos-problem-in-2017/>

<sup>2</sup> Stockholm Convention, SC-4/17, Listing of perfluorooctane sulfonic acid, its salts and perfluorooctane sulfonyl fluoride, available from <http://chm.pops.int/Implementation/IndustrialPOPs/PFOS/Decisions/tabid/5222/Default.aspx> , accessed 7<sup>th</sup> October 2021

<sup>3</sup> ECHA, Substance Infocard, <https://echa.europa.eu/fr/substance-information/-/substanceinfo/100.015.618>

<sup>4</sup> See for instance, HBM4EU, Scoping Document for PFAS, 2019, Section 1.1.2 Hazardous Properties, [https://www.hbm4eu.eu/wp-content/uploads/2019/03/HBM4EU\\_D4.9\\_Scoping\\_Documents\\_HBM4EU\\_priority\\_substances\\_v1.0-PFAS.pdf](https://www.hbm4eu.eu/wp-content/uploads/2019/03/HBM4EU_D4.9_Scoping_Documents_HBM4EU_priority_substances_v1.0-PFAS.pdf); pp. 1-2

<sup>5</sup> FIGO, FIGO calls for removal of PFAS from global use, 25<sup>th</sup> May 2021, <https://www.figo.org/figo-calls-removal-pfas-global-use>

See also joint FIGO-UCSF-HEAL multilingual infographic on the health risks associated with PFAS exposure: <https://www.env-health.org/how-pfas-chemicals-affect-women-pregnancy-and-human-development-health-actors-call-for-urgent-action-to-phase-them-out/>

<sup>6</sup> “The need for a coordinated action against PFAS - Information from the Belgian delegation”, Information note, 24<sup>th</sup> September 2021, <https://data.consilium.europa.eu/doc/document/ST-12150-2021-INIT/en/pdf> , accessed 4<sup>th</sup> October 2021

**We are however concerned that very little is currently being done by national authorities, including Belgian ones, to address existing PFAS pollution cases, which are known to already impact the health of local communities and their environment.**

**In Belgium, PFOS pollution around Antwerp is a reality**, as confirmed by the measurement of PFOS in the soil in 2018. Shockingly, eggs hatched within a 15-kilometer radius of the 3M factory of Antwerp were found to pose health risks by researchers of the University of Antwerp, especially for children (due to higher ingestion relative to their weight)<sup>7</sup>. In the summer 2021, sampling organized by Grondrecht and carried out by researchers of the Free University of Amsterdam found excessively high PFOS concentrations in the blood of local residents, with all samples exceeding the recently updated safety threshold for the sum of PFOA, PFNA, PFHxS and PFOS of the European Food Safety Agency (EFSA)<sup>8</sup>. This alarming situation was again confirmed by the recent publication of the results of the analysis of the Flemish Care and Health Agency (Agentschap Zorg en Gezondheid) at the end of October, which find excessive PFOS levels in the blood of more than half of the 800 citizens tested<sup>9</sup>.

**The situation requests urgent action on three main levels, namely environmental and health monitoring, clean-up of the site, and accountability of the polluting companies towards residents and authorities.** We are aware that a Flemish parliamentary enquiry is currently investigating the chain of responsibilities within the regional government and administration and that an administrative procedure is looking into the conditions, in which the Antwerp factory reported for the waste emitted in relation to its operations.

**However, to date and as far as we are aware, very few measures have been taken to address the pollution itself in order to cater for the known and presumed health risks encountered by the surrounding communities, besides adapted health guidelines for food consumption. Given the level of commitment displayed by the Belgian federal authorities with regards to the challenge of PFAS pollution at the European level, we would like to enquire about measures currently being considered and/or developed to address the real-life consequences of the situation of communities in the area of Antwerp and Zwijndrecht.** Notwithstanding the complex institutional set-up of the Belgian institutions and split of responsibilities between the regional and national levels, we believe that the seriousness of the situation and its potential far-reaching impacts require the involvement of the federal institutions.

**Therefore, with this letter, we would like to ask you what your respective ministries are planning to do in order to:**

- **Respond to and support the local communities' request for transparency and accountability about the pollution and the related health and environmental consequences;**

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<sup>7</sup> Groffen Thimo, Lopez Antia Ana, D' Hollander Wendy, Prinsen Els, Eens Marcel, Bervoets Lieven. Perfluoroalkylated acids in the eggs of great tits near a fluorochemical plant in Flanders, Belgium <https://doi.org/10.1016/J.ENVPOL.2017.05.007>

See also: <https://www.brusselstimes.com/news/belgium-all-news/173456/3m-pollution-pfos-eggs-hatched-within-15-km-of-factory-in-antwerp-pose-health-risks-says-uantwerp/>

<sup>8</sup> Grondrecht, Persbericht bloedonderzoek Zwijndrecht, 4th August 2021,

<https://grondrecht.eu/facts/actueel/persbericht-bloedonderzoek-zwijndrecht/>

<sup>9</sup> Agentschap Zorg en Gezondheid, Bloedonderzoek toont hoge waarden van PFOS bij meer dan de helft van de deelnemers – no-regretmaatregelen worden uitgebreid, 26 October 2021, <https://www.zorg-en-gezondheid.be/bloedonderzoek-toont-hoge-waarden-van-pfos-bij-meer-dan-de-helft-van-de-deelnemers-%E2%80%93-no>

- **Guarantee the precise mapping of the sites requesting cleanup and their effective decontamination, including the site where the Oosterweel-project is currently being developed;**
- **Ensure the due monitoring of the evolution of environmental contamination (through regular measurements in water and soil);**
- **Guarantee that every possible measure is being implemented to ensure that local communities can have access to clean and safe water and food;**
- **Ensure the due monitoring of the health-related risks of long-term exposure to PFOS for surrounding communities (including through regular large-scale human biomonitoring for all nearby residents and health follow up for those most at risk) and workforces of the companies concerned. Currently, the Flemish government does not plan to provide individualized testing for all (e.g. for children, for people who have moved out of the area, for inhabitants of Antwerp) and long-term monitoring of individual health situations. Because of this lack of action, we appeal to the federal government to step in.**
- **Guarantee that the polluter-pays principle is being implemented, namely that the companies responsible for the pollution in the first place are legally and financially kept accountable.**

We look forward to your responses on these important and urgent questions and we would welcome the opportunity to exchange with you in details during a meeting at your earliest convenience.

Yours sincerely,

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

Jonas Vernimmen  
Coordinator  
**GRONDRECHT**

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