

Swift, coherent and more ambitious action by EU Member States needed to address the climate, environment challenges for better health for all

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According to the World Health Organisation (WHO), the environment is a major determinant of health, estimated to account for almost 20% of all deaths in the WHO European Region. The 8th EU Environment Action Programme (8 EAP) that entered into force in May 2022 sets the framework for EU environmental policy until 2030. It is a key policy instrument to protect health and prevent disease from climate and environmental threats.

In particular, the 8 EAP sets a number of priority objectives, targets and indicators until 2030 in areas that are of high relevance for health, such as climate change mitigation and adaptation, as well as zero pollution (including on air pollution) and a toxic-free environment. Among so called “enabling conditions”, the 8 EAP commits to reduce environmental inequalities.

The Health and Environment Alliance (HEAL), an alliance of over 80 member organisations, has been engaged¹ in the policy development and implementation of the 8 EAP, and previous EAPs. We welcome the opportunity to respond to this consultation.

HEAL considers that overall, since 2022, Member States have been too slow and unambitious in the implementation of the 8 EAP commitments, which results in health impacts and cost occurring which are preventable.

According to the EEA’s recent first monitoring report², the EU is not on track to meet the majority of the 8 EAP targets by 2030. The EEA highlights the urgent need “for stronger implementation by the Member States of existing laws, additional measures, and mainstreaming climate and environment in other policy domains are needed for faster progress”.

For the remaining five years of the 8 EAP, HEAL urges Member States to significantly increase delivering on the 8 EAP objectives, especially when it comes to adopting measures which recognize the urgency to act, ending fossil fuel subsidies, and swifter action on zero pollution for a non-toxic environment (air and chemicals pollution):

¹ See the 2020 HEAL comments on the draft 8EAP decision <https://www.env-health.org/heal-feedback-on-new-8th-environment-action-programme/>

² <https://www.eea.europa.eu/en/newsroom/news/meeting-eu-environment-policy-targets-by-2030-will-be-challenging>

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1. Ending fossil fuel subsidies: EU's credibility as a global leader at stake

Reducing environmentally harmful subsidies, in particular public financing for fossil fuels (coal, oil and gas) with a view to phasing them out without delay is a key enabling condition foreseen by the 8 EAP, given that these subsidies are hampering and slowing down the climate transformation, and the move away from pollution which harms people's health.

Yet according to the EEA³, "phasing out fossil fuel subsidies without delay seems unlikely as most EU Member States still lack concrete plans to do so". The EEA data is highly worrisome, given that fossil fuel subsidies increased in 2022 and more than 60% of all fossil fuel subsidies granted in that year were spent in three EU founding Member States (Germany, Italy and France).

This continued subsidizing of fossil fuels risks the EU's credibility as a global leader in tackling climate change and achieving the 2050 climate neutrality goal.

2. Tackling health harm from air pollution inequalities

Air pollution is the top environmental risk factor for health in the EU, but action at the Member state level for clean air has been slow and unambitious, leading to significant health impacts and cost which are largely preventable.

While the EEA's assessment highlights that the EU is on track to reaching the 2030 zero pollution objective of reducing premature death from particulate matter by 55%, HEAL considers this goal to be unambitious as it would leave a too high health burden.

In addition, we are highly concerned by the EU Member states approach for delays and weakening the revised EU's Ambient Air Quality Directive (EU), which is currently in trilogue state⁴. Given the urgency to act, HEAL considers it necessary that a swift date for the full alignment of clean air standards with WHO recommendations is set, as well as an ambitious, health protective framework adopted.

However, Member states are seeking years long delays for keeping to new standards, which would reinforce inequalities in exposure to air pollution within and between Member States. Such an approach further threatens achieving the 8 EAP goal of reducing air pollution exposure disparities. The EEA considers that "lack of progress in reducing air pollution exposure disparities [...] indicates that so far there has been no progress with reducing environmental inequalities in the EU, at least when it comes to air pollution."

³ <https://www.eea.europa.eu/publications/european-union-8th-environment-action-programme/indicators/19-fossil-fuel-subsidies-indicator/view>

⁴ <https://www.env-health.org/health-groupsto-letter-health-groups-coalition-calls-on-eu-environment-ministers-to-accelerate-action-for-clean-air-for-health/>

3. Swifter action on reducing health harm from hazardous chemicals

Pursuing zero pollution, including in relation to harmful chemicals, is one of the 8 EAP priority objectives, with the sound management of chemicals at international level, as well as swiftly substituting substances of concern, EDCs and others, included in the 8 EAP enabling conditions.

However, progress on chemicals management is not monitored as part of the 8 EAP indicators and the 2023 EEA report. This is extremely concerning given the increasing number of planetary boundaries being crossed⁵, including the planetary boundary on novel entities encompassing the introduction and accumulation of all novel chemical compounds created by humans, such as microplastics, pesticides and nuclear waste.

HEAL considers it paramount that chemicals management and reducing the health harm from chemicals continues to be a priority of action for the EU and Member states.

HEAL calls in particular on EU institutions and EU Member states to renew their commitments for the full implementation of the Chemicals Strategy for Sustainability and catch up on the delays to upgrade EU chemicals regulatory framework. The landmark EU chemicals law REACH is in dire need of reform, as the pace of restricting and phasing out chemicals has been woefully slow.

It is urgent for the EU to:

- Put forward and adapt a health-protective update of the EU chemicals law REACH, truly implementing the ‘no data, no market’ principle, allowing for swifter restrictions of (groups of) substances, and accounting for our real-life exposure to chemicals mixtures in risk management.
- Swiftly restrict harmful substances such as endocrine disruptors and PFAS, which are widely used in polluting materials such as plastics, in pesticides and in many everyday products. Safer alternatives are available.

The health burden from hazardous chemicals is unacceptably high and keeps growing. Preventing the fast-rising rate of non-communicable diseases, such as breast cancer and prostate cancer, obesity and diabetes as well as infertility and learning disorders, requires urgent improvements in EU laws.

⁵ <https://www.stockholmresilience.org/research/research-news/2023-09-13-all-planetary-boundaries-mapped-out-for-the-first-time-six-of-nine-crossed.html>

The way forward on 8 EAP implementation for better health

Given the growing body of evidence and data on how the environment impacts health in the European Union, HEAL considers it key that for the remaining time of the 8 EAP, Member states step up in taking measures to implement the 8 EAP objectives, recognizing the urgency to act on the multiple crises including from global heating, environmental pollution and biodiversity loss.

This would also be in line with and help to implement the EU Member States commitments in the Declaration of the Seventh Ministerial Conference on Environment and Health in Budapest in 2023⁶.

In addition, HEAL calls on the European Commission and Member States to recognize the interlinkages between the social and the environmental determinants of health, and take measures to address social inequalities and health for a Just Transition, not only in the 8 EAP implementation period, but also in the development and implementation of a 9th EU Environment Action Programme.

⁶ <https://www.who.int/europe/publications/i/item/EURO-Budapest2023-6>

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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.



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