10 November 2026

To: Members of the European Parliament

Plenary debate: Missing health considerations in European Commission work programme 2027

Dear MEP,

This Wednesday, you will be having an exchange on the European Commission work programme 2027 which was published last week. Its stated aim is to continue to drive Europe's competitiveness with further simplifying legislation, including working towards a Pact against gold-plating with member states when transposing EU legislation.

The Health and Environment Alliance (HEAL) is an alliance of over 70 member organisations working for better health through a healthier environment. We represent health professionals, not-for-profit health insurers, doctors, nurses, cancer and asthma groups, citizens, women's and youth groups, environmental NGOs, scientists, and public health institutes.

Please see here HEAL's letter to Commission President von der Leyen ahead of the 2027 work programme publication, which includes the call to withdraw the Food and Feed Safety Omnibus proposal and to refrain from proposing any further environmental and climate simplification proposals.

HEAL is concerned that the simplification proposals in the area of environment which have been put forward to date ignore the health and economic costs of pollution and will result in a weakening of key protection provisions, especially when it comes to chemicals and pesticides pollution. We consider that for decreasing overall costs and strengthening the EU's resilience in the climate change, biodiversity loss and pollution crisis, the urgent issue at stake for the EU's environmental and climate regulatory framework is not "simplification" but rather better implementation and enforcement, enabled by adequate investment in the next EU budget.

Further deregulating the existing legislative framework will result in additional suffering for people, increased health costs and increased legal uncertainty for all operators. This burden will inevitably fall more heavily on the most vulnerable in society, including children, people living with disease and people experiencing socio-economic health inequalities.

The urgency to phase out fossil fuels

The burning of fossil fuels is at the core of both climate change and air pollution, as it leads to substantial emissions of air pollutants and greenhouse gases. Fossil fuel extraction, production, combustion and use impact health and the environment. In your recent resolution on the 2026 UN Climate Change Conference you called for stronger political commitments to phase out fossil fuels. The work programme 2027 is unfortunately silent on a fossil fuel exit plan. We encourage you to hold the European Commission accountable on their stated intention for the "EU to become stronger and more independent", for which a swift phase out of fossil fuels is essential.

A one-sided focus on business cost, negating the burden of disease

Europeans' health is impacted like never before from climate change, biodiversity loss and pollution, leading to a significant burden of disease. In the case of chemicals pollution, the existing cost assessments are but the tip of the iceberg, with new incoming evidence, e.g. the EU EXPOSOME project.

However, in current simplification debates, there is a one-sided focus on *reducing administrative burden or heavy burden* on businesses, while these health costs are negated.

For example, pesticides pollution is linked to a significant number of diseases - this includes childhood cancers, non-Hodgkin lymphoma, and Parkinson's disease, to name a few. It is estimated that in 2017 alone, the societal costs – including health costs – directly attributable to pesticides pollution were approximately €2.3 billion.

Environmental pollution also plays a leading role in the development and aggravation of heart attacks and strokes, as almost 20% of deaths from cardiovascular disease are due to a polluted environment. Last but not least, the combination of heat and air pollution increases the rate of premature death for patients with cardiovascular and respiratory disease in cities.

These cost considerations need to urgently be recognised in "simplification" considerations for EU policies.

People's health and a clean environment at the center of stronger implementation

An EU Commission 2025 own communication highlights that the lack of implementation and enforcement of EU environmental laws heavily impacts the EU economy, leading to costs of at least €180 billion annually.

Preserving, protecting and improving the quality of the environment as well as protecting human health are enshrined in the EU treaties as objectives of the Union's environmental policy. Preventive action should be taken, environmental impacts should as a priority continue to be rectified at the source, and the polluter should pay.

The European Commission needs to play its unique role as guardian of the treaties in ensuring that EU laws prioritise the public interest, that is the protection of people and planetary health.

HEAL considers that a focus on reducing administrative cost and burden to businesses is a shortsighted and narrow perspective, disregarding the significant costs to people's health (including impacts to vulnerable groups) and the need for strengthened resilience of the natural environment in view of pollution, climate change and biodiversity loss.

We are available for any further information.

Regards,

Anne Stauffer

Deputy Director

Health and Environment Alliance (HEAL)

Annex

People’s health is threatened like never before from climate change, biodiversity loss and pollution. According to the World Health Organization (WHO), this triple crisis is responsible for almost 20% of all deaths in the European region. Everyone’s health in the EU is at risk, but some are more vulnerable than others, including children, pregnant women, the elderly, those already sick or those facing socio- economic health inequalities. 85% of respondents to the 2025 Eurobarometer consider climate change a serious problem for the world, while a growing share of Europeans (38%) report feeling personally exposed to environmental and climate-related risks.

With more than two out of five deaths, cardiovascular diseases are the leading cause of death in the European Union. Pollution plays a leading role in the development and aggravation of heart attacks and strokes, and almost 20% of deaths from cardiovascular disease are due to a polluted environment. More frequent and more severe heatwaves exacerbate the already high burden of disease, from the combination of heat and air pollution.

Europeans are deeply worried about the health impacts of chemicals pollution. An estimated 23,000 sites in Europe are contaminated by PFAS, and 12.5 million Europeans live in communities where drinking water is polluted with these chemicals. A continuously growing body of scientific evidence links PFAS exposure to an increased risk of serious health impacts, including kidney and testicular cancer, liver disease, higher cholesterol levels, cardiovascular complications, decreased immune response, thyroid disease, hormone disruption, decreased fertility, and maternal and neonatal complications.

A 2026 report from the European Commission estimates the total societal costs of PFAS pollution — including health and remediation — at nearly €440 billion by 2050 if no restriction measures are taken.

This figure covers only the health costs related to already-regulated PFAS (PFOA, PFOS, PFHxS and PFNA), meaning the real costs of all PFAS pollution are likely significantly higher. The report also estimates that a full phase-out of PFAS would reduce health costs from approximately €39.5 billion per year in 2024 to around €0.5 billion per year by 2040.