



To:
 President-elect Ursula von der Leyen
 Executive Vice-President Frans Timmermans
 Commissioner-elect Virginijus Sinkevičius

European Commission, Rue de la Loi 200, Brussels

8 November 2019

Re: A chemicals strategy as part of the European Green Deal: time to deliver

Dear Ms President-elect von der Leyen, dear Mr Executive Vice-President Timmermans, dear Mr Commissioner-elect Sinkevičius,

We, the undersigned, warmly welcome your [pledge](#), as well as complementary words by Commissioner-elect Sinkevičius during his confirmation hearing, to tackle the grave threat of chemical pollution and protect the European citizens and future generations by addressing hazardous chemicals, pesticides and endocrine disruptors (EDCs) as part of the European Green Deal.

The European Green Deal should promote an ambitious long-term vision for EU chemicals policy under the cross-cutting strategy for zero pollution or as a stand-alone chemicals strategy that integrates the topics from the promised Non-Toxic Environment Strategy – and go beyond these. We wish to ‘offer guidance’ on what we regard as red lines by which the Green Deal should be measured.

Pollution from synthetic chemicals is a major and [growing](#) threat to [people and wildlife](#), perhaps the foremost threat we face for the following reasons. Today, chemical pollution, has already reached the most [remote corners of the globe](#), from the deepest oceans to the highest mountains. Industrial chemicals have also reached our bodies, researchers describe babies born today as “pre-polluted”. As adults, we all harbour some [300](#) synthetic substances our grandparents did not, of which many are proven to be toxic.

This pollution is linked to a rise in severe health and environmental problems throughout Europe that are adding [billions of Euros](#) to public healthcare bills. There is evidence that

chemicals exposure contributes to adverse effects to [health](#) and [environment](#), threatens especially [pregnant](#) women, deforming our [children](#) in the womb and injuring their developing [brain](#), stunts our [intelligence](#), is linked to [fertility](#) impairments, increases incidences of diseases such as [cancer](#) and threatens the collapse of Europe's [ecosystems](#).

Europe has rightly charted a course towards a circular economy, however harmful and even banned chemicals are increasingly [found](#) in consumer products made from recycled content, including toys, frequently because firms do not know the chemicals content of the materials they are handling. Toxic recycling is reducing trust in recycled products and delaying the transition to a circular economy.

The EU strategy to address endocrine disrupting substances (EDCs), is now 20 years old. Yet, the Commissions has largely failed to deliver on the commitment to manage the risks with these chemicals.

REACH was set out to phase out [1,400](#) of the most dangerous substances and to provide a powerful spur for firms to develop less harmful alternatives. A decade later, only [43](#) are subject to authorisation while the almost [blanket](#) authorisations being granted by the EU of continued use of substances of very high concern (SVHC) is disincentivising the use of safer alternatives. Furthermore, some of these SVHCs such as phthalates are currently allowed in food contact materials.

The law usually takes decades to catch up with chemicals that should never have been used, meanwhile people and the environment are unnecessarily exposed.

In the last decade, the EU institutions have gained considerable knowledge, including a range of policy evaluation activities¹. These identify a number of gaps in the EU legislation, which undermine the protection of people, wildlife and ecosystems against harmful chemicals. But these gaps remain largely open without a clear strategy on how to address them. The EU now needs to transform this knowledge base into urgent action.

We wish to echo the European Parliament and Council in calling for a swift revival of the long-overdue non-toxic environment strategy; action on endocrine disrupting chemicals (EDCs) and to detoxify the circular economy.²

Promises of sustainability while business continues as usual is not an option. The EU needs to be more specific on what a strategy is aiming for, and to clarify that this includes moving towards reducing exposure to hazardous chemicals, to phase out and substitute the most problematic ones and support the research and innovation of safer alternatives.

The European Commission now has a golden opportunity to set out a long-term chemicals strategy that prioritises health and environmental protection under the European Green Deal.

We call on the Commission to prioritise **3 zero-chemical pollution goals:**

1- Make the EU the global champion of a non-toxic circular economy and sustainable innovation by:

¹ [Non Toxic Environment study](#), [REACH Review](#), [interface between chemicals, products and waste legislations](#), [Fitness Check of the most relevant EU chemicals legislation \(excluding REACH\)](#)

² [Parliament Resolution of April 2019](#) and [June 2019](#), and October 2019 Council Conclusions on the [8th Environment Action Programme](#) and on the [circular economy](#)

- ✓ Supporting responsible, safe and sustainable innovation and substitution, creating an obligation of full disclosure of chemical composition for consumer products and preventing toxic recycling;
- ✓ Becoming a responsible global actor that neither exports or imports chemicals and products banned for use in the EU;
- ✓ Promoting the restrictions of families of chemicals of concern such as PFAS, mercury, bisphenols, or phthalates as well as harmful chemicals used in consumer products such as toys, cosmetics, food contact materials, textiles, hygienic products, construction products and childcare equipment.

2- Position the EU as protector of vulnerable populations from toxic pollution by:

- ✓ Elaborating an action plan to protect vulnerable populations to prevent risks of exposure;
- ✓ Preventing chemicals with severe and long-term effects from entering our homes and environment. This includes all endocrine disruptors and toxic chemicals that build up in the ecosystems, drinking water and in human bodies, pre-pollute babies before birth, and then after birth through contaminated breast milk should be phased out without delay.

3- Act on early warnings of chemicals pollution and make polluters pay by:

- ✓ Breaking legislative silos to trigger restriction of identified substances of concern across legislations;
- ✓ Creating new systems to detect and act based on early warnings, which should be financed by the companies that market chemicals of concern;
- ✓ Enabling quick reaction to early warnings by giving full application to the precautionary principle.

Please find attached an annex to this letter with further information on our demands. If these are integrated into a chemicals policy strategy then the zero pollution ambition promised in your political guidelines will be a promise kept and will also support the credibility of the European Green Deal as a transformative agenda that also helps set a new social contract for Europe.

We thank you for consideration of this important matter.

Yours sincerely,



Jeremy Wates,

Secretary General of the European Environmental Bureau

On behalf of:

European and international organisations:

CHEM Trust

CIEL - Center for International Environmental Law

ClientEarth

ECOS – European Environmental Citizens Organisation for Standardisation

EEB – The European Environmental Bureau

HEAL – Health and Environment Alliance

HEJSupport International

HCWH Europe – Health Care Without Harm Europe

IPEN

PAN EU, Pesticides Action Network Europe

WECF – Women Engaged for a Common Future

Zero Waste Europe

European National organisations:

Alborada Foundation, Spain

The Alliance for Cancer Prevention, United Kingdom

Arnika - Toxics and Waste Programme, Czech Republic

Avicenn, France

CPES - The Cancer Prevention and Education Society, United Kingdom

ECOCITY, Greece

Eco Council - Danish Ecological Council, Denmark

Ecologistas en acción, Spain

Future in our hands, Norway

GLOBAL 2000, Austria

ZERO – Associação Sistema Terrestre Sustentável, Portugal

CC:

Mr. Daniel Calleja Crespo, Director-General for Environment

Ms Anne Bucher, Director-General for Health and Food Safety (SANTE)

Mr Timo Pesonen, Director-General for Internal Market, Industry, Entrepreneurship and SMEs (GROW)

Ms. Veronica Manfredi, Director - Quality of Life (ENV.C)



Mr. Kestutis Sadauskas, Director - Circular Economy and Green Growth (ENV.B)

Ms. Cristina de Ávila, Head of Unit, sustainable chemicals

Mr. Diederik Samsom, Mr. Timmermans' cabinet

In view of the public interest in this matter, we intend to make this letter publicly available.