

From: [REDACTED]@eeb.org>
Sent: mardi 2 juin 2020 12:33
To: [REDACTED] (CAB-KYRIAKIDES)
Cc: [REDACTED] (CAB-KYRIAKIDES); [REDACTED] (ETUC); [REDACTED] (BEUC - BUREAU EUROPÉEN DE L'UNION DES CONSOMMATEURS)
Subject: Request for a virtual meeting – Chemicals Strategy for Sustainability
Attachments: BEUC, EEB, ETUC call for a revitalized EU chemicals policy.pdf
Importance: High

Dear Mr [REDACTED],

On behalf of the European Consumers Organisation (BEUC), the European Environmental Bureau (EEB) and the European Trade Union Confederation (ETUC), I contact you to request a virtual meeting to present our concerns about the impact of toxic chemicals on people's health and the environment and to have an exchange on potential solutions in view of the upcoming Chemicals Strategy for Sustainability announced under the European Green Deal.

We read with interest the recently published [roadmap](#) for the Chemicals Strategy for Sustainability. In view of the current COVID-19 crisis, we strongly agree that protecting both human and planetary health with the use of safe chemicals becomes increasingly important to promote societal resilience from interconnected threats, and to build economies that create wellbeing and improve quality of life.

We firmly believe that Europe can solve the health and environmental problems of chemical exposure in ways that are good for our economy. A revitalized EU chemicals policy is in our view essential in this respect and will also support the credibility of the European Green Deal as a transformative agenda that helps establish a new social contract for Europe.

Attached to this email you will find our joint recommendations for how the Chemicals Strategy should radically scale up and speed up actions to achieve these objectives by setting Europe on the path to a non-toxic economy and a healthy future.

Given the urgency to step up actions in the chemicals area illustrated by the COVID-19 crisis, we hope that you would be available for a virtual exchange on our recommendations, ideally before the end of June, either using Skype, Zoom or any other platform that would be eligible under Commission rules.

Thank you in advance. We look forward to hearing from you.

Kind regards,



on behalf of BEUC, EEB and ETUC



Chemicals & Nanotechnology

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The European Environmental Bureau (EEB) is Europe's largest network of environmental citizens' organisations, standing for environmental justice, sustainable development and participatory democracy.

EC register for interest representatives: Identification number 06798511314-27
International non-profit association - Association internationale sans but lucratif (AISBL)

CIVIL SOCIETY ORGANISATIONS TOGETHER FOR EUROPE:

THE EUROPEAN GREEN DEAL MUST REVITALISE EU CHEMICALS POLICY TO PROTECT EUROPEAN CITIZENS AND ENVIRONMENT

The impact of toxic and persistent chemicals on our health and environment

All sectors of our economy rely on the use of synthetic chemicals. Chemicals can bring benefits to our society, but many also contribute to the rise in severe health problems across the EU and the strain on Europe's ecosystems. Chemicals of concern are ubiquitous in the food we eat, the water we drink, in our homes, at work and in our environment. Every new-born baby is now born 'pre-polluted' with a cocktail of industrial chemicals; toxic and even banned chemicals are frequently present in the products we use every day, while chemical pollutants are detected in the most remote and unexpected parts of the planet, from the deepest oceans to the highest mountains.

The long-term impact of this ubiquitous exposure is not fully understood. Scientists however increasingly link certain synthetic chemicals to a range of neurodevelopmental disorders as well as chronic and severe diseases, such as allergies, diabetes, fertility problems, obesity, and cancer. Chemicals in the working environment are a leading cause of occupational diseases and deaths in the EU. The pervasiveness of chemical pollutants in our environment threaten a wider ecosystem collapse.

Chemical pollution negatively impacts our economy. For example, in the EU, the cost alone of human exposure to endocrine disrupting chemicals – a diverse group of substances which can disrupt the hormonal system – has been estimated at 157 billion Euros per year. The cost of work-related cancers is estimated to be between €270 and €610 billion each year – or between 1.8% and 4.1% of the EU's annual gross domestic product.

The EU must act now to protect its citizens and environment.

EU surveys show that around two-thirds of European citizens are concerned or very concerned about their exposure to chemicals in everyday products. Less than half of respondents (45%) feel well informed about the potential dangers of the chemicals contained in consumer products.

In 2002, the EU committed to the UN goal of sound management of chemicals throughout their lifecycle by 2020. Despite some landmark achievements, notably the 2006 REACH Regulation, progress on achieving this goal has stalled. The 2019 State of the Environment report by the European Environment Agency thus [demonstrates](#) that the outlook for the coming 5-10 years is negative (deteriorating). Last year, the European Commission [concluded](#) that the EU will not achieve the 2020 UN chemicals management goal. As a result, the EU's transition to a circular economy therefore is at risk of creating never-ending toxic material

loops, where hazardous chemicals are given a second lease on life in our products and our homes.

The reasons for this failure are multiple and complex; a primary cause is however the lack of political will and action by decision-makers to further drive forward the development, implementation and enforcement of an ambitious EU chemicals policy to protect health and the environment. Too often, such a policy is wrongly depicted by its opponents as ignoring the economic implications. On the contrary, evidence piles up on the need for an ambitious EU chemicals policy to drive innovation in the direction of safer, sustainable alternatives as the basis for development of a non-toxic economy. This will position the EU ahead of other parts of the world and help to fulfil the promise in the Von der Leyen Political Guidelines to make the EU a world leader in circular economy and clean technologies.

We need an ambitious vision for EU chemicals policy to 2030 and beyond

We can solve the health and environmental problems of chemical exposure in ways that are good for our economy. A decade ago, the European Union led the world in forging strong tools to reduce exposure to chemical pollutants. It's time for the EU to do so again. The European Green Deal presents a unique opportunity for the EU to radically scale up and speed up actions to protect its citizens and ecosystems. EU decision-makers must seize this opportunity to set Europe on the road to a non-toxic and healthy future.

On behalf of Europe's consumers, workers and environment, we therefore insist that the EU must urgently establish an overarching 2030 chemicals strategy with a clear action plan and timelines that:

- **effectively reduces our overall exposure to chemicals of concern.** This will require swift identification of and action against chemicals of concern across all sectors including as a starting point by: phasing out substances of very high concern (SVHC) across all EU chemicals legislations and adopting Binding Occupational Exposure Limit Values (BOELs) for 25 extra priority carcinogens under the Carcinogens and Mutagens Directive (CMD) by 2024; as well as accounting for and regulating low-dose effects and the cumulative impact of chemicals from multiple sources (mixture effects) well before 2030.
- **better protects our vulnerable populations**, such as infants, pregnant women, and people with genetic susceptibilities and compromised immune systems as well as key ecosystems and species. This should be done by 2024 through updating existing laws to better address chemicals of concern (e.g. on cosmetics, food packaging, water), and through new laws, (e.g. on child-care products or textiles). Immediate action is needed with regard to endocrine disruptors: the EU should treat them similarly to carcinogens and ensure that all relevant legislative frameworks are adapted without delay to protect the health of current and future generations.
- **guarantees coherence and integration across different EU policies** (occupational, consumers, health, environment, industry, research, etc.) by for example extending the scope of the Carcinogens and Mutagen Directive to cover substances toxic for reproduction no later than 2024. Implementation and enforcement of the EU chemicals framework must urgently be improved to guarantee that our legislation translates into real protection of health and the environment.

- **stops the current paralysis by analysis and addresses new and (not-any-longer) emerging chemical risks** such as endocrine disruptors or nanomaterials. The EU also needs new regulatory tools based on the precautionary principle to ensure early action on early warnings.
- **ensures full disclosure of chemicals present in products and workplaces, while eliminating chemicals of concern from the circular economy.** By 2030 the EU should establish a harmonised mandatory and public information system on chemicals in products, materials, and waste. Strict rules are needed to prevent toxic recycling such that for example, recycled food packaging do not contaminate our food with legacy chemicals.
- **boosts the use of safer alternative chemicals, products and processes** by establishing economic incentives to support substitution, clean production, frontrunner companies, eco-labelling schemes, and green public procurement. Harmful subsidies and products must be eliminated without delay
- **ensures that the EU's environmental and democratic principles aiming to protect people and the environment are implemented.** Increased access to information and participation for workers, consumers and health and environment organisations in decision-making processes is required to ensure that the regulatory system is responsive to citizens' concerns.

On behalf of Europe's consumers, workers and environment, we call on all EU decision-makers to let Europeans know that you are serious about a threat that poll after poll demonstrate they care about. Show us that Europe can make a difference to protect people and the environment. Invest in the generations to come by rewarding research and development of safer alternatives, a clean economy and sustainable innovation today.

ENDS