



To: President Ursula Von der Leyen

Cc: First Executive Vice-President Frans Timmermans

European Commission, Rue de la Loi 200, Brussels

Brussels, 12 October 2020

Re: Time to ensure the EU is on the path to a toxic-free environment

We, the undersigned, warmly welcome the European Commission's commitment to a future-proof and ambitious **Chemicals Strategy for Sustainability** (CSS) that ensures health, environmental and economic resilience, and a toxic-free environment.

This week, we expect you to present a truly transformative CSS, driving the detoxification and decarbonisation of our economies, while creating millions of secure jobs. Shifting from toxic and linear resource-intensive production models to safer and circular sustainable ones seeking zero pollution and zero waste will improve the resilience of our economies. But this commitment will be undermined if the actions to be announced this week in the strategy are put under a general reservation of impact or innovation assessment.

As the impact of Covid-19 rumbles on, we are experiencing a human catastrophe: lost lives, widespread sickness, unprecedented social hardships, and job losses. Exposure to toxic chemicals increases our vulnerability to pandemics such as Covid-19, and yet the toxification of the planet is a growing threat to people and wildlife across the globe.

In the past decade, the chemicals regulatory system has improved the situation in Europe, but there is still a long way to go to achieve a toxic-free environment. The [European Environment Agency](#) warns that ongoing exposure to chemical pollution continues to negatively affect human health and the environment, with latent and irreversible damage to human health being of particular concern.

Today, **it still takes too long, and it is too burdensome for authorities to regulate dangerous chemicals.**¹ In 2002, as part of its commitment to Better Regulation, the European Commission launched a new initiative - Impact Assessments - on most new proposals. Eight years on, the latest [evidence](#) suggests that Better

¹ Clarifying concerns about a chemical takes on average [seven to nine](#) years. Once a chemical is known to be dangerous, it takes almost another decade to restrict it. Moreover, in the vast majority of cases (89-96%), the European Commission further [delays chemical decisions](#) for up to five years.

Regulation is a major cause of inaction and fails to protect people and the environment. Better Regulation has become a synonym of paralysis by analysis.

This disappointingly slow pace of regulatory processes - and frequent inaction - cause **unnecessary exposure to harmful chemicals**. The costs of inaction are high, and it is the EU citizens who pay the billions of Euros' bill.²

This *status quo* is no longer politically acceptable. The EU can fix this situation. **Through the Chemicals Strategy for Sustainability, we believe that the EU can solve chemical pollution and prevent diseases.** This requires committing to the following:

- **speeding up chemicals control to detoxify the planet and reduce exposure levels**, especially to very persistent and very mobile substances, developmental neurotoxic and immunotoxic substances, endocrine disruptors, and nanomaterials as well as stopping regulatory delays,
- **ensuring coherence and mutual reinforcement of the regulatory framework**,
- **boosting toxic-free innovation** and avoiding regrettable substitution,
- **simplifying and reducing the burdens for the authorities** to regulate harmful chemicals, while making their work more effective,
- **limiting impact assessments** to duly justified cases while applying the precautionary principle in the case of substances with harmful properties and widespread exposure. The CSS must contribute to achieving the European Green Deal's objectives, including its **Green Oath, and consider the 'costs of inaction'**,
- **applying the polluter pays principle** to ensure a healthy democracy,
- **demanding transparency** - full disclosure of which chemicals are used, starting with the products that are aimed at the most vulnerable, our children - which chemicals are used in toys and other products for kids,
- **promoting protective and strict regulation measures outside of EU borders** by pushing for effective and financially sustained global chemical policies and conventions.

It is time for the different Commission services to be united and decide what we value the most, share a vision for a better future, and to put well-being at the heart of EU policy.

A toxic-free future is one that ensures good living and working conditions for all, clean water, air and soil, a thriving natural world, and a safe climate for the next generation, as well as strong and well-functioning democracies to protect us in times of need. **Achieving such a future requires ambition and the determination to make the right political decisions at the right time. An ambitious EU Chemicals Strategy for Sustainability can pave the way for other countries and regions to follow. We call on you to ensure that the planet and public interests are put above chemical polluters' interests.**

² The range of estimated annual health-related costs due to PFAS exposure is [EUR 52–84 billion](#) for all EEA (European Economic Area) countries. The best conservative estimate of health costs arising from exposure to endocrine disruptors is [163 billion euros every year](#) in Europe.

We thank you for your consideration of this important matter.

Yours sincerely,



Jeremy Wates
Secretary General
European Environmental Bureau

On behalf of:

Arnika - Toxics and Waste Programme

BUND/Friends of the Earth Germany

The Cancer Prevention & Education Society

CHEM Trust

Center for International Environmental Law (CIEL)

The Danish Consumer Council

ECOCITY, Greece

European Environmental Bureau (EEB)

Framtiden i våre hender (Future in our hands), Norway

GLOBAL 2000/Friends of the Earth Austria

Health Care Without Harm (HCWH) Europe

Health and Environment Alliance (HEAL)

Health and Environment Justice Support (HEJSupport)

Women Engage for a Common Future (WECF)

ZERO - Association for the Sustainability of the Earth System

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

