

To:

Rebecca Pow MP, Parliamentary Under Secretary of State, Defra;

CC:

Màiri McAllan MSP, Cabinet Secretary for Net Zero and Just Transition;

Julie James MS, Minister for Climate Change;

Katrina Godfrey, DAERA Permanent Secretary

5th July 2023

Dear Minister Pow,

The UK must set out policies and a chemicals management system that properly protects people, wildlife, and our environment from the harms of chemical pollution. The Chemicals Strategy is an opportunity to determine a bold vision to ensure this protection and to prevent future pollution.

In the absence of a public consultation on the Strategy, we are keen to add our collective expertise on the policy options to reduce the exposure of people and wildlife to harmful chemicals, and for the safe and sustainable use of chemicals.

We welcome the ambitions in the Environmental Improvement Plan, in particular its focus on significantly reducing levels of harmful chemicals entering the environment and meeting the COP15 Target 7 of reducing pollution risk by 2030. We also welcome its commitment to following the environmental principles enshrined in the Government's flagship Environment Act. To achieve these ambitions, we would like to draw your attention to the 12 Key Asks for the UK Chemical Strategyⁱ.

12 Key Asks for the Chemicals Strategy

1. Prioritise prevention and precaution
2. Phase out the most hazardous chemicals from consumer products for all non-essential uses
3. Protect UK citizens and the environment from endocrine disrupting chemicals (EDCs)
4. Phase out the use of PFAS and other very persistent chemicals
5. Speed up regulation of harmful chemicals and avoid regrettable substitution by adopting a grouping approach
6. Address the 'cocktail effect'
7. Maintain and expand on workers' health and safety
8. Ensure a clean circular economy with products that are safe by design
9. Develop an effective monitoring and alert system
10. Stop the continued accumulation of legacy chemicals in the environment
11. Remain aligned with the world-leading chemical regulation EU REACH
12. Ensure more transparency and use of all relevant science for assessing health risks

Since we published the Asks two years ago, the evidence that chemical pollution and the use of harmful chemicals threatens our health, wildlife, and pollutes our environment continues to grow: the UN cited pollution as one of the five key drivers of biodiversity loss, the Lancet Commission found 1 in 6 deaths were caused by pollution, and scientists found pollution levels had surpassed the safe operating limits for our planet. The UK public is concerned about the state of the UK's waterways, and the media is increasingly reporting on chemical pollution across the UK.

We would like to set out specific actions that could be undertaken to achieve some of these Asks:

Phase out the most hazardous chemicals from consumer products for all non-essential uses

Harmful chemicals have been found in many different products from sofas and clothing, to food packaging and cosmetics. It is unacceptable that such chemicals can be used in products that people, including vulnerable groups and children, come into contact with during their daily lives. A generic approach to risk management should be adopted, and the most hazardous chemicals, such as chemicals that are carcinogenic, mutagenic and reprotoxic (CMRs); endocrine disruptors (EDCs); immunotoxic; neurotoxic; toxic to a specific organ; or are persistent and bioaccumulative and toxic (PBTs) or persistent and mobile and toxic (PMTs), should not be allowed in consumer products including those made from recycled materials.

Protect UK citizens and the environment from endocrine disrupting chemicals (EDCs)

The endocrine system plays a critical role in the health, development and wellbeing of people and animals. The harmful impact that endocrine disrupting chemicals can have has been known for more than 20 years. They have been found in people's bodies and in the environment, and can have harmful effects at very low levels. In response, several European countries have taken specific actions to address EDCs, including Belgium, Denmark, France, and Swedenⁱⁱ.

Speed up regulation of harmful chemicals and avoid regrettable substitution by adopting a grouping approach

Developing a new chemicals management system for the UK is both costly and time-intensive. Implementing a grouping approach - where similar chemicals are grouped together to be assessed and managed - will save both money and resources. It will speed up the regulation of harmful chemicals, which has been too slow in keeping pace with the threats harmful chemicals pose. This approach also addresses the risk of 'regrettable substitutions', where one harmful chemical is replaced by another similar chemical that is later found out to be harmful.

Address the 'cocktail effect'

We, our children, wildlife and the wider environment are constantly exposed to a complex cocktail of known and suspected harmful chemicals through air, water, food, consumer products and other routes. Chemical safety regulations must recognise this and address the true, real-life risk posed by combined exposure to multiple chemicals. To do this, we recommend introducing a Mixture Assessment Factor of 100. Further recommendations can be found in CHEM Trust's 2022 reportⁱⁱⁱ.

We would be grateful for a response and any indication as to how the 12 Key Asks are being taken forward, including via the Chemicals Strategy and the Major Conditions Strategy. We would also welcome an update on the Chemical Strategy and a timeline for its publication.

We welcome further engagement on this issue and look forward to hearing from you.

Yours sincerely,

Dr Anna Watson, Director of Policy & Advocacy, CHEM Trust

Catherine Gunby, Executive Director, Fidra

Thalie Martini, Executive Director, Breast Cancer UK

Mark Owen, Head of Fisheries, The Angling Trust

Juliet Tizzard, Director of External Relations, Parkinson's UK

Jamie Page, Executive Director, The Cancer Prevention and Education Society

Kate Metcalf, Co-Director, Women's Environment Network

Janet Newsham, Coordinator of Greater Manchester Hazards Centre, GM Hazards Centre

Chris Butler-Stroud, CEO, Whale and Dolphin Conservation

Jacquie Loughrey, Education and Prevention Officer, The Pink Ladies Cancer Support Group

Craig Macadam, Conservation Director, Buglife – The Invertebrate Conservation Trust

Richard Benwell, CEO, Wildlife and Countryside Link

Roz Bulleid, Research Director, Green Alliance

Henry Swithinbank, Policy and Research Manager, Surfers Against Sewage

Dr Rob Collins, Director, Policy and Science, The Rivers Trust

Dr Janina Gray, Deputy CEO/Head of Science & Policy, WildFish

Gill Perkins, CEO, Bumblebee Conservation Trust

Dr James Robinson, Director of Conservation, Wildfowl & Wetlands Trust

Dr Chris Tuckett, Director of Programmes, Marine Conservation Society

Mike Childs, Head of Science, Policy & Research, Friends of the Earth

Jeff Knott, Deputy Director - Policy and Advocacy, RSPB

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

ⁱ 12 Key Asks for the UK Chemicals Strategy, May 2021, <https://chemtrust.org/wp-content/uploads/12-Key-Asks-for-the-UK-Chemical-Strategy-1.pdf>

ⁱⁱ Belgium set to launch its first-ever national action plan to increase health and environment protection from endocrine disrupting chemicals, February 2022, <https://www.env-health.org/belgium-set-to-launch-its-first-ever-national-action-plan-to-increase-health-and-environment-protection-from-endocrine-disrupting-chemicals/>

ⁱⁱⁱ Chemical Cocktails – The neglected threat of toxic mixtures and how to fix it, March 2022, https://chemtrust.org/wp-content/uploads/Chemical-cocktails_CHEMTrust-report_March-2022.pdf