



Ms Stella Kyriakides
European Commissioner for Health and Food Safety
European Commission
Brussels

Brussels, 23 September 2020

Dear Commissioner Kyriakides,

RE: The European Chemicals Strategy for Sustainability needs a stronger disease prevention and health protection dimension to align with Europe's Beating Cancer Plan

On behalf of the [Association of European Cancer Leagues \(ECL\)](#), we are writing to you today in relation to the Chemicals Strategy for Sustainability, which is due to be published on 14 October 2020.

As cancer leagues working across Europe on prevention and health promotion, **we believe the European Chemicals Strategy for Sustainability can contribute to the successful implementation of the upcoming Europe's Beating Cancer Plan** by carefully limiting the emissions of harmful pollutants in the environment in order to prevent diseases such as cancer.

In our view, the European Chemicals Strategy for Sustainability presents a unique opportunity to make Europe's regulations on chemicals more protective of health, more coherent and, therefore, more effective. This is why our [position paper on Europe's Beating Cancer Plan](#) (page 7) **urges the European Commission to protect citizens from harmful exposure to carcinogens in the environment and to use the Chemicals Strategy to rationalise and simplify regulations for substances causing cancer.**

As the European Chemicals Strategy for Sustainability is being finalised, we call on you to ensure that the following aspects are prioritised in order to create synergies with Europe's Beating Cancer Plan:

1. Promote public health-oriented regulation of chemicals based on their intrinsic properties:

- The most effective way to ensure protective management from the risks of chemicals is to minimise people's exposure to hazardous chemicals. However, according to [Eurostat data](#), **74% of the chemicals produced in the EU in 2018 were hazardous to health**, while the [World Health Organisation](#) estimates that **1.6 million lives were lost in 2016 due to exposures to selected chemicals** alone. Notably, **84% of Europeans are worried about the impact of chemicals present in everyday products on their health** ([Special Eurobarometer 468, 2017](#)).
- The strategy is an opportunity for the EU to **protect segments of the population that are particularly vulnerable to hazardous chemicals**. This is the case for **pregnant women and unborn children, workers in the chemical and agriculture industry or agriculture and those already affected by non-communicable diseases such as cancer**. Current risk assessments typically fail to cater for the susceptibility of such populations, which is an argument in favour of **extending the hazard-based approach**, currently used for endocrine disrupting chemicals, **to chemicals management**.
- **Putting a greater focus on the intrinsic properties of substances** as a general rule would allow for faster, more protective and more coherent regulation across legislations, potentially **unleashing significant gains for public health**. This could **create incentives for industry players to develop safer alternatives** rather than promoting a status-quo situation, in which it is less costly to use harmful substances.

2. Introduce measures to better identify endocrine disrupting chemicals (EDCs) and effectively minimise people's exposure to them:

- Current citizens' **exposure levels to EDCs are a significant concern for cancer leagues across Europe**, considering the mounting evidence about their association with hormone-related cancers (La Merrill et al., 2020; HEAL & TEDX, 2019; Giulivo et al., 2016; Scsukova et al., 2016), and the available estimates of **health costs associated to EDC exposure, at least 163 billion euros per year in Europe only** (Trasande et al., 2016). Therefore, in line with commitments made in the [Commission Roadmap](#) and demands from the Council of the European Union and the European Parliament, it is important for the European Commission to commit to strong measures to guarantee:
 - The **effective identification of EDCs, based on their intrinsic properties, across sectors and legislations;**
 - The **commitment to ban EDCs in consumer products** and minimise exposure as much as possible in other sectors. This is **particularly important in order to protect the parts of the population who are most vulnerable** to EDC effects (unborn and young children, teenagers, pregnant women, people already impacted by non-communicable diseases, such as cancer);
 - The **commitment to coherent management of EDCs across sectors**, meaning that once a substance is identified under one regulation, this should be enough to trigger its restriction under other regulations.

We thank you for your attention and ongoing commitment to mainstreaming disease prevention and health promotion across the diverse portfolios of the European Commission.

Yours sincerely,



Dr Sakari Karjalainen

President, Association of European Cancer Leagues (ECL)



Dr Wendy Yared

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